

Local Housing Strategy

2013 – 2018

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Local Housing Strategy 2013 - 2018

Foreword

I am pleased to present Moray Council's Local Housing Strategy 2013-2018.

The Strategy describes the challenges Moray faces. These are largely associated with the shortage of affordable housing, clearly evidenced in the Housing Need and Demand Assessment, as well as demographic changes, and fuel poverty. The Strategy has been developed at a time of economic uncertainty and when public spending is under severe pressure. Public spending cuts will mean that the ability of the Council and its partners to achieve its LHS Outcomes will be constrained.

The Strategy sets out the key issues facing Moray's housing system, predominantly demographic change. This has necessitated an enhanced level of partnership working between partners, and alignment between the Outcomes of this Strategy and those of the Local Plan 2013-2018, and the Moray Joint Commissioning Strategy for Older People's Services 2012-2022.

I extend my thanks to the organisations and individuals who have helped to develop this strategy, and look forward to working with you over the coming years as we achieve improvements in Moray's housing system.



Councillor Eric McGillivray
Chair of Communities Committee



Introduction

1.1 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. This is the third Local Housing Strategy for Moray.

1.2 What is an LHS?

1.3 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.

1.4 Which areas does it cover?

1.5 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
Local Housing Strategy Equality Impact Assessment
Moray Housing Need and Demand Assessment 2011

2 Governance arrangements

2.1 The Council established a multi-agency, officer level, Housing Strategy Group in 2000 to drive the process of developing the first LHS 2004–2009. This group included representatives from the relevant Council and health services, Registered Social Landlords (RSLs), Scottish Government (then Communities Scotland), enterprise companies, and private sector representative bodies.

2.2 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 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. The Housing Strategy Group operates within the Community Planning Framework and is responsible for advising on strategic issues relating to housing.

- 2.3 All LHS activity is reported to, and approved by, the Council's Communities Committee¹. On 6 March 2012 the Communities Committee approved the Outline Draft LHS 2013-18 and on 11 December 2012 the Communities Committee approved the draft LHS for public consultation.

3 Consultation Arrangements

- 3.1 Both the Communities Committee and the Housing Strategy Group have discussed and agreed the stakeholders to be consulted and the methods of consultation to be used.
- 3.2 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. Full details of LHS consultation activity, including methods used and feedback received, is available at Appendix 2.
- 3.3 Staff responsible for the LHS, the LDP and the Moray Joint Commissioning Plan for Older People's Services have worked closely to ensure the LHS priorities, outcomes and actions are closely aligned, regarding housing land supply and provision of appropriate housing for older people.
- 3.4 The Council is a member of the Scottish Housing Best Value Network (SHBVN) and regularly uses its services to benchmark with, consult with, and seek advice from peers in other local authorities, and learn from published best practice.

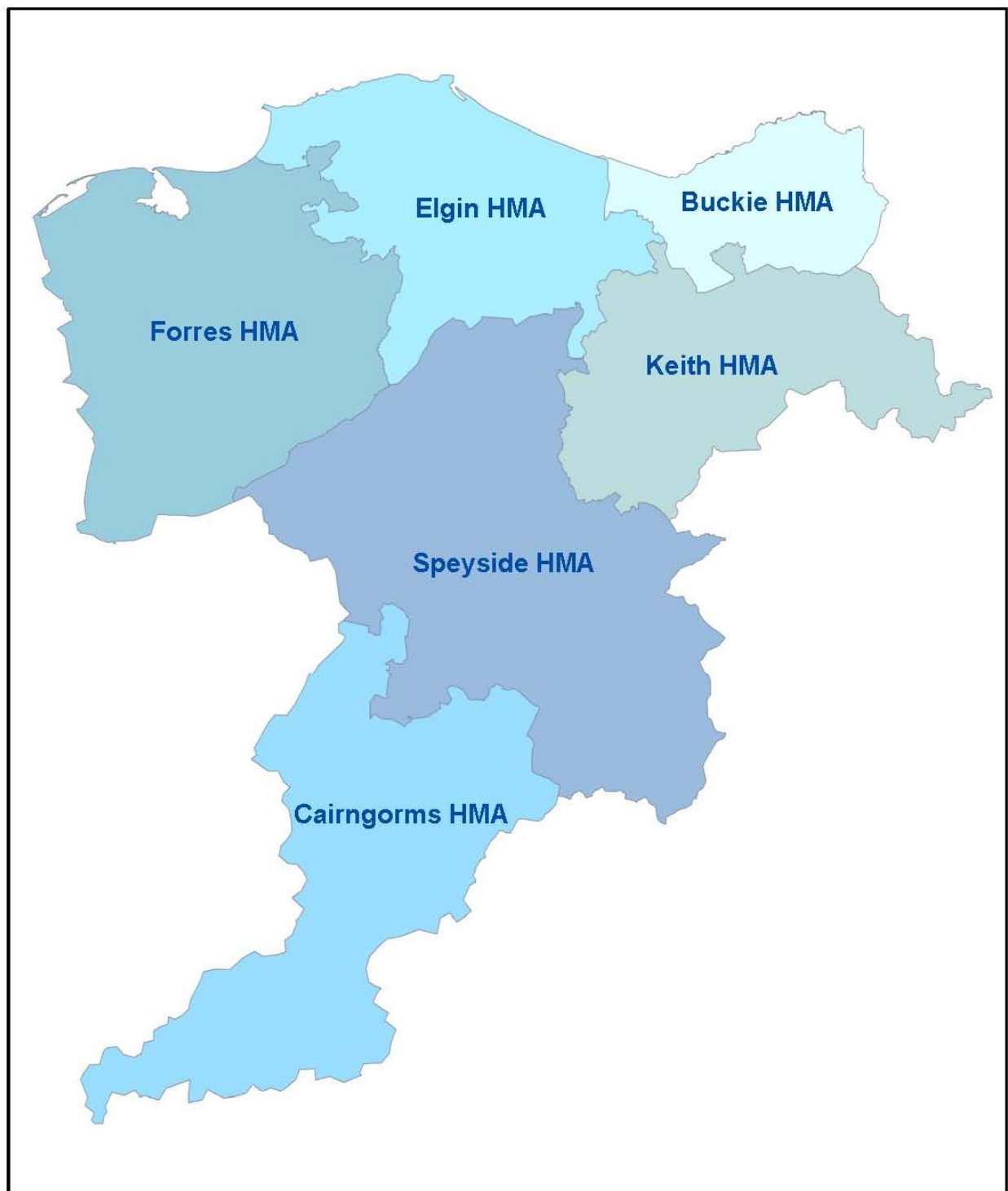
¹ All Council Committee papers are available at
http://www.moray.gov.uk/moray_standard/page_39823.html

4 **Functional Housing Market Areas**

- 4.1 The Scottish Government's HNDA guidance makes reference to Local Housing System Analysis: Good Practice Guide 2004. This Guide states that "a functional area is defined as an area that is meaningful to households searching for housing to suit their purposes"².
- 4.2 Moray is a self contained functional housing market area. Analysis of house sales between 2004 and 2009 shows that 73.45% of houses sold in Moray, were bought by a purchaser originating from within Moray. The next largest originating area was England (7.97%). This result is the same as stated in the previous LHS 2004 – 2009.
- 4.3 Further analysis of house sales has identified six sub 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 2011. These sub market boundaries provide a best fit between patterns in house sales and 2001 census output areas, to facilitate analysis of other datasets using this geography. Housing Market Areas should be regarded as housing search areas, identifiable to Moray's general public. They do not necessarily match administrative/management boundaries.
- 4.4 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

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

Figure 1: Moray Housing Market Areas (HMA)



4.5 A list of the towns and settlements included in each Housing Market Area is available at Appendix 3.

5 Equality

- 5.1 “Local Authorities are expected to mainstream³ the culture of equality in all aspects of their service delivery and planning. This includes housing advice, homelessness, procurement, new build and refurbishment, specialist housing services, housing management services, allocations and private sector housing”⁴.

The Equality Act 2010

- 5.2 On the 5th April 2011, the Equality Act 2010 introduced a new public sector general equality duty which became law in Scotland.
- 5.3 The general equality duty 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.
- 5.4 These requirements will apply across the 'protected characteristics' of:
- age
 - disability
 - gender reassignment
 - pregnancy and maternity
 - race
 - religion and belief
 - sex and sexual orientation
- 5.5 The new duty replaces the three previous duties relating to race, disability and gender equality.⁵
- 5.6 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.”⁶
- 5.7 Moray Council is committed to meeting its legal duties under equalities legislation.
- 5.8 The housing needs of each “protected characteristic” (formerly equality strand) have been assessed as part of the Housing Need and Demand Assessment 2011. The HNDA 2011 provides a robust and credible

³ Mainstreaming means systematically considering equality and diversity at all stages, and in all aspects of the organisation's activities.

⁴ Scottish Government Guidance on mainstreaming equalities in LHSs available at <http://www.scotland.gov.uk/Topics/Built-Environment/Housing/supply-demand/deliveryframework/lhs/LHSME>

⁵ <http://www.equalityhumanrights.com/scotland/public-sector-equality-duty-in-scotland/>

⁶ Equality Act 2010 Guidance, Office for Disability Issues, HM Government available at <http://odi.dwp.gov.uk/docs/law/ea/ea-guide-2.pdf>

evidence base on equalities issues, and the findings have been mainstreamed throughout the LHS' priorities, outcomes and actions.

Equality Impact Assessment

- 5.9 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 11 December 2012, and has been subject to consultation with equality groups and stakeholders. The EIA is available at Appendix 6.
- 5.10 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 older people and people with disabilities. This is based on the findings of the HNDA 2011 and previous research into the housing needs of particular needs groups carried out to inform the previous LHS, as well as the result of partnership working with the Moray Health and Social Care Partnership as it pursues the "reshaping care for older people" agenda.

Human Rights Act 1998

- 5.11 The human rights contained in Articles 6, 8 and 14 are those which are most likely to be relevant to provision of social housing⁷:

Article 6: Right to a fair trial (an absolute right)

Article 8: Right to respect for private life, family life and the home (a qualified right)

Article 14: Prohibition of discrimination (a qualified right)

⁷ More information is available from the Equality and Human Rights Commission at <http://www.equalityhumanrights.com/human-rights/human-rights-practical-guidance/human-rights-at-home/guidance-for-social-housing-providers/>

6 Strategic Environmental Assessment

- 6.1 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.
- 6.2 SEA has a key role to play in delivering the Scottish Government's central purpose of sustainable economic growth, by ensuring greater consideration of the impact that public plans, programmes or strategies will have on Scotland's environment and by providing an important opportunity for public participation in plan decision making.
- 6.3 The [Environmental Assessment \(Scotland\) Act 2005](#) came into force on February 20, 2006. The 2005 Act implements the [EU Directive 2001/42/EC](#), 'on the assessment of the effects of certain plans and programmes on the environment' which was the original driver for SEA within Scotland.
- 6.4 The Council has completed a screening report covering the LHS itself, and its associated suite of Strategies and Plans. 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 Plan, and will be subject to current Building Regulations. Therefore, the Council believes that these environmental impacts will be considered as part of the Local Development Plan SEA. The screening report reflects this, and this position has been accepted by SEA Gateway Consultation Authorities⁸. A public notice to this effect was published in the Northern Scot on 6 April 2012.
- 6.5 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 Plans, or with any Scottish Government insulation scheme (e.g. Green Deal, UHIS) will be subject to planning approval and Building Regulations, and will be covered by the Local Development Plan SEA.

⁸ SEA documents are available at:
<http://www.scotland.gov.uk/Topics/Environment/environmental-assessment/sea/SEAG>
and http://www.moray.gov.uk/moray_standard/page_1917.html

7 Strategic Priorities and The Local Planning Framework

7.1 The overall aim of the Local Housing Strategy is:

To ensure that sufficient good quality, affordable housing⁹ is available to meet the needs of people living in or requiring housing in Moray.

National Housing Policy Context

7.2 The Scottish Government has set 5 strategic objectives for a more successful Scotland; that Scotland will become:

Wealthier and fairer;
Smarter
Healthier
Safer and stronger; and,
Greener

7.3 There are 15 national outcomes supporting one or more of these strategic objectives (see Para 1.12.2)

7.4 There are other Scottish Government policies and targets which influence the Council's strategic response to housing issues:

- The Scottish Government's pledge to deliver 30,000 affordable homes over five years
- the legal obligation that, by December 2012, Councils are in a position to offer permanent accommodation to all unintentionally homeless people
- by April 2012, all social landlords must ensure that all their dwellings pass all elements of the Scottish Housing Quality Standard (SHQS)
- the Scottish Government's aim that, by November 2016, so far as is reasonably practicable, nobody will be living in fuel poverty in Scotland.
- By December 2020, contribute to Scotland's commitments to reduce energy consumption by 12% and greenhouse gas emissions by 42%.
- The Reshaping Care for Older People programme and NHS Scotland's "Reshaping care for older people" agenda¹⁰, which aims to optimise independence and wellbeing for older people at home or in a homely setting, moving away from residential care homes.

⁹ Affordable housing is housing made available at a cost below full market value, to meet an identified need. It includes social rented housing, subsidised low cost housing for sale (discounted, shared ownership or shared equity) and low cost housing without subsidy (entry level housing for sale). Private rented accommodation available at lower cost than market rents and mid-market rent, should also be considered within the affordable housing category (ref: HNDA Guidance 2008). The term intermediate affordable housing is used to cover all types of affordable housing which are not social rented.

¹⁰ <http://www.shiftingthebalance.scot.nhs.uk/an-overview/>

- Age, Home and Community: A strategy for housing for Scotland's Older People 2012-2021, which proposes action on better use of existing housing, and design of new build housing for older people.¹¹
- "Getting it right for every child and young person" and the Children and Young People Bill 2012

7.5 Moray's Single Outcome Agreement

7.5.1 The Single Outcome Agreement provides the overall direction for the Council and its community planning partners, and details how the Community Planning Partnership will contribute to delivering the Scottish Government's strategic priorities.

7.5.2 "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 deliver 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:

1. Healthier citizens
2. More ambitious and confident children and young people able to fulfil their potential
3. Adults living healthier, sustainable, independent lives safeguarded from harm
4. A growing and diverse economy
5. Employability and employment skills"¹².

¹¹ <http://www.scotland.gov.uk/Publications/2011/12/16091323/0>

¹² The Council's Single Outcome Agreement is available at:
http://www.moray.gov.uk/moray_standard/page_2101.html

- 7.5.3 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 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
1. Healthier citizens	Priority 1 Priority 3
2. More ambitious and confident children and young people able to fulfil their potential	Priority 1
3. Adults living healthier, sustainable, independent lives safeguarded from harm	Priority 1 Priority 3 Priority 4 Priority 5 Priority 6
4. A growing and diverse economy	Priority 1 Priority 2 Priority 4 Priority 5
5. Employability and employment skills	Priority 6

7.6 Moray Corporate Improvement Plan 2011/12

7.6.1 The Plan "confirms the Council's vision for Moray. It gives an overview of how the Council plans to play its part in achieving important outcomes that will provide Best Value for Moray in the future." This LHS will contribute to the deliver of "Best Value for Moray" through these Improvement Plan aims:

- Improving the condition of local housing
- Ensuring that there is a supply of affordable housing to rent or buy
- Looking after the Council's housing stock
- Tackling homelessness
- Providing money advice, helping people to reduce debt and maximise and manage their income
- Reducing vandalism and street disorder through community wardens, youth work etc.
- Keeping vulnerable people safe in their own homes

7.7 Related Strategies and Plans

7.7.1 The Scottish Government and COSLA published revised Local Housing Strategy Guidance in June 2008¹³ and the Scottish Government published Scottish Planning Policy (SPP) in February 2010¹⁴. Together these documents require housing and planning authorities to work closely to

¹³ Local Housing Strategy Guidance available at:
<http://www.scotland.gov.uk/Publications/2008/06/25093503/0>

¹⁴ Scottish Planning Policy available at:
<http://www.scotland.gov.uk/Topics/Built-Environment/planning/National-Planning-Policy/newSPP>

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 preparation of local housing strategies and development plans should be closely aligned*”.

Moray Local Development Plan 2013-2018

- 7.7.2 The Local Development Plan and the Supplementary Planning Guidance on Affordable Housing have historically been the main source of development 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 2011. **The Proposed Plan is due to be published in September 2013, examination in December 2014 and with the new Plan adopted in March 2015.**

Moray Strategic Housing Investment Plan

- 7.7.3 The Strategic Housing Investment Plan (SHIP) is heavily influenced by the LHS and the HNDA, and sets out how the Council and its partners will prioritise available funding. The SHIP provides a list of affordable housing development projects in a 3 year rolling programme.

Moray Joint Commissioning Strategy for Older People’s Services 2012 - 2022

- 7.7.4 The Joint Commissioning Strategy for Older People will review and update the Older Peoples Strategy: Living Longer, Living Better; an Older Peoples Strategy for Moray 2009-2014. The Scottish Government outlined their requirements for local Community Health and Social Care Partnerships to produce a Joint Commissioning Strategy in the document “A Programme of Change”. This approach will ensure there is both a strategic national, and local, focus for reshaping care throughout the next decade. Preventative, anticipatory and dementia care will form important parts of the Moray Joint Commissioning Plan for Older People’s Services.

Moray Economic Strategy and Elgin – City for the future

- 7.7.5 The Moray Economic Strategy and Elgin – city for the Future have been commissioned by the Moray Community Planning Partnership as twin strategies which will underpin Moray’s economic development for the foreseeable future. Elgin – City for the Future focuses on the economic future of Moray’s business and commercial capital, which the Moray Economic Strategy presents an over-arching vision of ambition, innovation and sustainable economic growth, building on key strengths while encouraging diversification across all areas of the local economy.

8 Moray Context

- 8.1 Moray is a geographically varied region of Scotland, incorporating the Moray Firth coastline, the broad lowlands of Moray and southern, 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.
- 8.2 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)¹⁵.
- 8.3 The HNDA contains statistical data on many features of Moray’s housing system. The HNDA is intended as a reference document, as well as a key evidence base for this LHS. In the interests of brevity, this LHS will not restate the statistical, tabular data published in the HNDA, but where appropriate, will cross reference to the HNDA tables, and its findings and conclusions, throughout.

8.4 Moray’s demographic profile

Population

- 8.4.1 The HNDA 2011 found that Moray’s estimated population in 2009 was 87,660¹⁶ and that the population grew by 0.83% between 2001 and 2009. Moray’s population is projected to grow by 2.95% to a 90,245 by 2023¹⁷, a lower rate than most of Moray’s neighbouring local authorities.
- 8.4.2 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.

Households

- 8.4.3 The HNDA 2011 found that there were 38,810 households in Moray in 2008, and that by 2023 there are projected to be 42,480, an increase of 9.46%¹⁸. This is a slower rate of increase than all of Moray’s neighbouring local authorities. 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.
- 8.4.4 In 2011 there were 12,780 (32%) single adult households. By 2023, this is projected to rise to 15,710 (37%).
- 8.4.5 In 2011, there were 9,290 (23%) families with children. By 2023 this is projected to drop to 7,600 (17.9%).

¹⁵ <http://www.scotland.gov.uk/Topics/Built-Environment/Housing/supply-demand/chma>

¹⁶ NRS small area population estimates (mid 2009)

¹⁷ NRS, 2008-based Population Projections for Scottish Areas (Table 1)

¹⁸ NRS, Household Projections for Scotland, (2008 based) (Table 5)

8.4.6 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+
- 166% more single adult households aged 90+

8.4.7 NRS Migration statistics show a trend for negative (-) net migration in young people aged 17-20.

8.4.8 The number of households arriving from A8 Nations has been proportionally less than neighbouring local authorities and has decreased since 2007/8.

8.5 **Moray's Economic profile**

8.5.1 The HNDA 2011 provides a detailed assessment of Moray's economic profile; employment sectors, unemployment, the influence of the presence of the Armed Services and future economic prospects. In summary, the HNDA 2011 has found:

- Moray has had lower than average levels of 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 proportionally 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.

8.6 **Moray's housing stock**

8.6.1 The HNDA 2011 provides a detailed assessment of Moray's housing stock and how it has changed over the last 10 years. The HNDA found that:

- Moray has low levels of ineffective housing stock, across tenures, with 95% of dwellings 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 Scotland as a whole, 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, due to continued investment and the requirement to meet the SHQS by 2015.
- The bulk of any recent new build activity in all tenures has taken place in Elgin and Forres HMAs.
- A small number of demolitions of affordable housing have been necessary, associated with flood risk and flood alleviation measures.

9 Housing Need and Demand In Moray

9.1 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)¹⁹.

9.2 The HNDA contains statistical data on many features of Moray’s housing system. The HNDA is intended as a reference document, as well as a key evidence base for this LHS. **In the interests of brevity, this LHS will not restate the statistical, tabular data published in the HNDA, but where appropriate, will cross reference to the HNDA tables, and its findings and conclusions, throughout.**

9.2.1 Moray’s HNDA 2011 provides a comprehensive assessment of the operation of Moray’s housing markets and key market drivers, as well as an estimate of the number of units of affordable housing required to meet housing need each year for the next 10 years. The HNDA also considers the housing needs of households with particular housing needs e.g. older people, disabled people and people in need of supported housing.

9.3 Using 3 scenarios, the HNDA provides:

- estimates of the number and type of affordable housing units required to meet housing need, including particular housing needs. These are intended to direct investment in affordable housing through the SHIP; and,
- estimates of the need for housing development land. These are intended to inform the Local Development Plan Main Issues Report, and allocation of a generous supply of housing development land.

9.4 Housing Need and Demand Assessment Findings

9.4.1 The HNDA 2011 has found that:

- 60% of Moray’s households cannot afford to meet their housing need from the open market without assistance.
- 560 households are currently in housing need
- 546 newly forming households will be in housing need each year for the next 10 years
- 337 existing households will fall into housing need each year for the next 10 years
- There will be approximately 451 affordable housing relets available to meet this need, each year for the next 10 years.

¹⁹ <http://www.scotland.gov.uk/Topics/Built-Environment/Housing/supply-demand/chma>

- 9.4.2 The HNDA calculates the annual affordable housing requirement, using a model based on current and estimated future demand vs. current and estimated future supply. **The HNDA found 424 units of affordable housing will be required each year, for the next 10 years to meet housing need.**
- 9.4.3 The HNDA also calculates annual demand for market priced housing, using a model which focuses on the lower quartile (entry level priced) sector of the housing market. **The HNDA found that 114 units will be required each year, for the next 10 years, to meet demand for entry level priced market housing.**
- 9.4.4 The HNDA has identified the following issues which could be addressed by the LHS. These issues have been discussed by:
- Housing Strategy Group at its meeting on 15 October 2011
 - The Council's Communities Committee at its meeting on 25 October 2011
 - Homelessness Strategy Group at its meeting on 2 November 2011
 - Older Persons Mental Health Working Group at its meeting on 28 March 2012
- 9.4.5 The Housing Strategy Group has considered the emerging issues for future policy/strategy, and suggested interventions, stated in the HNDA²⁰. The majority of these interventions have been included as actions in this LHS, or have been addressed prior to its publication.

²⁰ See HNDA 2011, Section 13, Pages 162 to 165 available at http://www.moray.gov.uk/moray_standard/page_1917.html

10 Local Housing Strategy Priorities

- 10.1 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 Single Outcome Agreement.
- 10.2 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.
- 10.3 The Housing Strategy Group has consulted widely on the strategic priorities and outcomes to be addressed by the LHS. The outcomes are based on a combination of the findings of the HNDA 2011, the priorities of the Single Outcome Agreement, legislative requirements, Scottish Government Policy, and the results of consultation with stakeholders and the general public.

- 10.4 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 legal duties 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

- 10.5 Each LHS Priority details:

- What our agreed outcomes²¹ 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.

²¹ "An outcome is a result we want to happen", from The Scottish Social Housing Charter Discussion Paper, 2011, Page 5

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

11.1 **Approach**

- 11.1.1 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.

11.2 **Context**

- 11.2.1 The context is provided through the following frameworks:

Housing (Scotland) Act 2001

Housing (Scotland) Act 2010

Welfare Reform Act 2012

*The Housing Benefit (Amendment) Regulations 2011*²²

Firm Foundations: the Future of Housing in Scotland: A discussion Document 2007, The Scottish Government, which sets a target for increasing supply of housing by 35,000 units per year

Housing (Scotland) Act 2010 contains significant reforms in relation to the Right to Buy, and also in relation to pressured area status designations.

Homes Fit for the 21st Century, The Scottish Government's Strategy and Action Plan for Housing 2011-2020

Social Housing Allocations: A Practice Guide, March 2011

Reasonable Preference in Scottish Social Housing, July 2011

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.

Scottish National Standards for Information and Advice Providers

Moray Council Equalities Scheme

*Scottish Social Housing Charter, Scottish Government 2012*²³ the Charter will help to improve the quality and value of the services that social landlords provide. Actions under this LHS Priority will help the Council and its partners to achieve the SHC outcomes relating to Housing Options (SHC Outcomes 7, 8 and 9) and Access to Social Housing (SHC Outcome 10).

²² <http://www.legislation.gov.uk/ukxi/2011/1736/memorandum/contents>

²³ <http://housingcharter.scotland.gov.uk/scottish-charter>

Housing Supply Targets and Land Supply

- 11.2.2 Of the 3 scenarios detailed in the HNDA 2011 (baseline, minimum and maximum) (Table 12.1, Page 160), the Moray Council has agreed to adopt the baseline scenario (538 units per year for 10 years) as the basis for minimum housing land requirements²⁴ in the next Local Development Plan, with the addition of a flexibility element of 50% in Elgin and Speyside HMAs.
- 11.2.3 The housing development land provision for the Cairngorms HMA is made by the Cairngorms National Park Authority²⁵.
- 11.2.4 Details of the final allocation of development land for housing are available in the Moray Development Plan.
- 11.3 **Key issues and drivers**
- 11.3.1 The HNDA 2011 found that, in 2010, 60% of households could not afford to meet their housing need from the market without assistance. The **affordability problems** are so severe that the potential for low cost home ownership schemes e.g. LIFT, to meet housing need are very limited. Similarly, the financial viability of mid-market rent models are constrained the limited projected equity increases in Moray, and the lower market rents (compared with urban, inner city areas). Therefore **the Council's priority will be the delivery of traditional affordable housing for rent.**
- 11.3.2 The UK Government's proposals on **Welfare Reform are a major external influence on access to housing**. The Welfare Reform Act 2012 received Royal Assent on 8 March 2012. Reduction in access to Housing Benefit may result in increased rates of rent arrears for social landlords, may have an impact on their Business Plans, and may change the nature of housing need if there is a significant increase in demand for smaller properties.
- 11.3.3 The HNDA 2011 found that **424 affordable homes would be needed each year**, for the next 10 years, and that there is a significant shortfall in availability of affordable housing.
- 11.3.4 **Ageing Population** – between 2008 and 2023 there are projected to be 30% more single adult households, 59% more households aged 75+, and 22% fewer families with children in Moray. The increasing numbers of older people in Moray will require the Council and its partners to be mindful of the **impact this will have, not only on demand for housing, but also on the way services are delivered** e.g. making publications available in Large Print, availability of home visits etc.
- 11.3.5 There is an imbalance between the size and type of housing available on the open market, and the size and type of housing required by an increasingly older population. This contributes to a flow of older owner occupiers seeking affordable rented housing. **It is unlikely that the public sector will be able**

²⁴ Planning and Regulatory Services Committee on 13 December 2011 (Item 4(a))

²⁵ <http://www.cairngorms.co.uk/park-authority/>

to meet the increasing demand for smaller, accessible housing. This gap could be met by an increase in the supply of modestly priced houses, adapted or readily adaptable, to meet the needs of people as they get older, to promote flexibility and choice in the housing market.

- 11.3.6 There is a **mismatch** between demand for, and supply of, different sizes and types of affordable rented housing. The HNDA has found there is less pressure on 2 bed Council housing, and much greater pressure on 1 bed and 4+ bed Council housing.
- 11.3.7 Scottish Government LHS guidance requires that equalities issues should be mainstreamed throughout LHS activity. The Housing Strategy Group has agreed an Equalities Impact Assessment (see Section 5 above). The EIA is available at Appendix 6. The EIA uses the HNDA 2011 as its evidence base. The EIA has identified negative impacts. **The negative impacts associated with this LHS Priority relate to the size of house available to older single person households.**
- 11.3.8 The HNDA 2011 found evidence to suggest that there is some **under occupancy** amongst Moray Council tenants, the majority of whom are 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.
- 11.3.9 For many years, Moray has had **low and reducing turnover of its affordable housing stock**, though this varies across house types and sizes. The current new build programme (see Priority 1) has stimulated turnover during 2012/13, increasing the number of relets available, but funding constraints are likely to bring this new build programme to an end.
- 11.3.10 When compared with the Scottish average, Moray's affordable housing providers **consistently perform well on reletting vacant affordable rented properties** within target timescales. The HNDA 2011 concluded that as a result of the general good performance (see (HNDA) Table 9.5) and the low numbers of low demand properties (see (HNDA) Tables 5.13 and 5.14), **there is no additional supply of affordable rented housing to be gained from reducing void periods.**²⁶
- 11.3.11 The Council has 4 separate Pressured Area Status designations with 4 different expiry dates²⁷, as well as owning properties where RTB does not apply e.g. new build properties, and sheltered properties; and tenancies where RTB does not apply i.e. tenancies beginning after 1 March 2011 where the tenant is new to social housing. Some Grampian Housing Association properties, which have the Right to Buy, have Pressured Area Status. Despite these PAS designations, under current legislation, **approximately half of Moray Council tenants retain their Preserved RTB status** i.e. their tenancy started before 30 September 2002.

²⁶ Moray Housing Need and Demand Assessment, Page 137

²⁷ Full details of the Council's PAS designations are available at http://www.moray.gov.uk/moray_standard/page_44662.html

11.3.12 The HNDA 2011 found that the current Supplementary Planning Guidance: Affordable Housing is **unlikely to generate sufficient affordable housing development opportunities**, and has the potential to disadvantage rural communities. Furthermore, the Council and local RSLs have a **limited land bank**.

11.3.13 The resources available to the Council and its partners will be the key determinant of the number affordable houses that can be delivered in Moray during the life of the LHS. The resources for new affordable housing supply in Moray have declined significantly since 2011 and are likely to be subject to ongoing constraints. The Scottish Government's 3-year allocation to Moray to fund affordable housing as part of the Strategic Local Programme (SLP) is £8.287m (only £6.2m of this is for new starts). This allocation compares with the £30m allocated to Moray during the 3 years between 2008 and 2011. The Moray SLP will supply a total of 188 affordable houses during 2012-15 compared with the HNDA estimate of 1,272 required to meet need during the same period. The Council's indicative resource planning assumption for 2015-18 of £5.563m represents a further reduction in the funding available for the Moray programme. With this level of funding it is estimated that the programme will deliver around 142 houses over the 3-year period. **The limited resources for new housing supply will clearly place a severe constraint on the Council's ability to adequately address housing need in Moray.**

11.3.14 **The capacity of affordable housing providers to develop housing will severely restrict the number of affordable houses that can be delivered in Moray.** The ability of RSLs to develop new housing for social rent in Moray has diminished following the reduction in Scottish Government grant subsidy rates from 2011. With uncertain demand for mid-market rent and low cost home ownership in Moray, there is reduced scope for RSLs to use grant savings achieved by intermediate tenure development to cross-subsidise social rent provision. As a result, RSLs development contribution to the Moray SLP will be marginal with the programme being delivered mainly by the Council. However, **the scale of the Council's programme is constrained by the ability of the Housing Business Plan to fund borrowing for new housing development.** The current rental income assumptions contained in the Business Plan will allow the Council to build a maximum of 225 houses during the life of the LHS.

11.4 Key Achievements – previous LHSs

- 11.4.1 The Council and its RSL partners have **completed and let approximately 500 new build** properties since 2008.
- 11.4.2 **Apply4homes – Moray’s Common Housing Register**²⁸ - In June 2012, Moray Council and Aberdeenshire Council, in partnership with Housing Associations operating in the Moray/Aberdeenshire area, implemented a Common Housing Register (CHR)²⁹. The Common Housing Register is consistent with the principles of the Council’s Designing Better Services programme, with its emphasis on self-service via the internet, and telephone services, making services **more accessible to the more rural areas** of Moray.
- 11.4.3 **The Council consistently achieves its target** that 90% of housing applicants are accepted onto the housing list within 21 days of receipt of their application.
- 11.4.4 Most Housing and Property Service leaflets, forms and letters have either been Crystal Marked or have been written in accordance with **Plain English** principles.
- 11.4.5 Housing and Property Service customers are provided with **communication in Large Print or in alternative formats or languages on request**.
- 11.4.6 The Council’s Housing and Property Service staff have received **training in Equality and Diversity**

11.5 Outcomes – what do we want to achieve?

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. (Scottish Social Housing Charter)

²⁸ Apply4homes available at <http://www.apply4homes.org.uk/>

²⁹ A full list of CHR partners is available at http://www.moray.gov.uk/moray_standard/page_80021.html.

11.6 Strategy – what will we do to achieve our outcomes

- 11.6.1 The HNDA 2011 identified affordability problems, and a mismatch between supply and demand across sizes and types of housing, in the public and private sector; and well as a significant shortage of affordable rented housing and problems identifying affordable development opportunities.
- 11.6.2 The Council will use all opportunities to maximise the availability of permanent affordable housing options. The Council and its partner RSLs will do this by:
- increasing the supply of affordable rented housing and maximising the value that can be achieved from any available Scottish Government funding.
 - making best use of current stock by reviewing our Allocations Policy, and minimising the time taken to relet empty properties,
 - retaining as much current affordable rented housing as possible, using current legislation e.g. pressured area status designations.
- 11.7 The actions the Council and its partners have agreed to take during the term of this LHS and described in the paragraphs below.

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

- 11.7.1 The Council and its RSL partners will deliver the Moray Strategic Local Programme (SLP) in an efficient and effective manner, seeking to take advantage of any additional resources made available by the Scottish Government, to increase housing supply. This will involve good performance in relation to target dates for project delivery and the promotion of “shovel ready” projects that can achieve early delivery.
- 11.7.2 In response to Scottish Government funding constraints, affordable housing providers will seek to develop new and innovative models to fund affordable housing provision in Moray. The Council and its partners will seek to maximise the non-public resources available to fund new affordable housing. The Council will also consider the use of commuted sums as a means of funding affordable housing developments.
- 11.7.3 The Council will review its Housing Business Plan on an ongoing basis to assess the potential for additional borrowing to support investment in new Council housing provision.
- 11.7.4 To increase the development capacity of the RSL sector in Moray, the Council will seek to work with partners who can deliver affordable social rented housing in Moray within the current grant subsidy regime and who can access alternative sources of finance.

- 11.7.5 The Strategic Housing Investment Plan (SHIP) will set out the Council's priorities for investing in affordable housing. The SHIP will provide details of the resources required to meet these priorities.

Develop a strategic land bank for affordable housing

- 11.7.6 The Council and its RSL partners will seek to purchase a land bank of sites to be used for affordable housing development. The Council will also explore opportunities for the release of land from public sector assets, including land owned by the Council and other bodies such as NHS Grampian. The investment priorities set out in the SHIP will provide the framework for assessing sites for inclusion in the strategic land bank. Any site(s) and development opportunities for affordable housing will be required to achieve planning permission in accordance with the Local Development Plan and Building Warrant approval.

Consider a review of the Supplementary Planning Guidance: Affordable Housing

- 11.7.7 The current Affordable Housing Policy, published in July 2009, states that "although housing need in Moray is high, the Council has taken into consideration local market conditions. As a result, the Council expects that all proposals for 10 units or more will provide a minimum of 25% of housing as affordable housing." and that "There are no significant land banks of Council or Housing Association land available for affordable housing in Moray. Therefore, a commuted payment instead of the direct provision of affordable housing will only be acceptable in exceptional circumstances."³⁰
- 11.7.8 The HNDA 2011 found that, across Moray, 78% of the minimum annual housing land requirement will be required to meet the need for affordable housing, although this varies across Housing Market Areas (see HNDA Table 12.2). If, hypothetically, all of the minimum housing land requirement were developed, the current Affordable Housing Supplementary Planning Guidance would generate a maximum of 134 units of affordable housing per year (25% of 538). This is some way short of the Net Housing Need Requirement of 424 units per year.
- 11.7.9 The HNDA also found that rural areas of Moray were disadvantaged by the current Supplementary Planning Guidance. Affordable housing contributions are only required from developments of 10 or more units. However there is a greater likelihood that developments in the rural areas of Moray will be for 9 or less units, because of the smaller scale of these settlements/ rural communities, leaving rural areas without the opportunity to gain affordable housing through Section 75 Agreements.
- 11.7.10 During the term of this LHS the Council and its partners will consider if revisions to the Affordable Housing Supplementary Planning Guidance would help the Council achieve the action to increase the supply of

³⁰ Moray Council Affordable Housing Supplementary Planning Guidance is available at http://www.moray.org/moray_standard/page_1650.html

affordable housing (see above), and therefore achieve its Outcomes under this Priority.

Influence the size and design of houses provided in future affordable housing developments

- 11.7.11 The HDNA 2011 found 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.
- 11.7.12 The HNDA also identified a mismatch between the size and type of affordable rented housing required and the size and type available. The HNDA found a disproportionate (greater) supply of 2 bed general needs properties, a shortage of 1 bed and 3+ bed general needs properties, and a shortage of accessible/adapted housing.
- 11.7.13 As part of the development of the HNDA 2011, the Housing Market Partnership was required to estimate number of affordable relets that would be generated from current stock per year, for the next 10 years, by Housing Market Area. The model used now enables the Council to use these data strategically, to determine the extent to which the mix of house sizes and designs of any future affordable housing development will address these imbalances. This information assists the Council to make best use of available public funding, and directly influences the SHIP/Strategic Local Programme.
- 11.7.14 The Council intends to continue to use this method to identify an appropriate housing mix for future affordable rented housing developments, tailored to each settlement/location.

Influence the size and design of houses provided in future open market housing developments

- 11.7.15 In the current economic climate, with reduced public expenditure, and with an ageing population, it is unlikely that the public sector will have the capacity to meet all housing need.
- 11.7.16 For this reason, the Council, as Housing Authority, will seek to influence local planning policies, to ensure the private housing market can provide appropriately designed housing for the future population of Moray, in particular for older and/or disabled people. See Appendix 6.

Research the market for, and feasibility of, intermediate tenures

- 11.7.17 The Scottish Government's paper "Homes Fit for the 21st Century" encourages the use of intermediate tenures such as shared equity products and mid-market rent, as a means for Council's to increase supply of housing for people on low incomes, in a climate of restricted public spending.
- 11.7.18 However the HNDA 2011 has found that, in Moray, the market for intermediate tenures is likely to be very limited. The reasons for this are:

- To date, RSL partners have been unable to make a mid-market rent development financially viable when market priced rents are already relatively low.
 - Take up of recent New Supply Shared Equity (NSSE) developments in Moray have been slow. Indeed, one property could not be sold and has been converted to affordable rent to avoid an extended void period.
 - NSSE purchasers generally bought the lowest equity stake possible (51%), were generally not on the Council's or any RSL's housing list, and therefore this investment was not addressing the most critical housing need.
 - Prospective purchasers, who do have access to mortgage finance and the substantial deposit required, may find purchase from the open market equally attractive as NSSE. This means there is a risk of public funding being used to meet aspiration to own a new-build home, rather than meeting housing need.
- 11.7.19 Since completion of the HNDA 2011, tenders for mid-market rent projects in Moray have produced limited numbers of responses, and tenders received were not "shovel ready".
- 11.7.20 During the term of this LHS, the Council and its partners will research the potential of intermediate tenures to address housing need, or to cross-subsidise the delivery of affordable rented housing.

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

Regularly review allocations quotas

- 11.7.21 For some years the Council has been compelled to maintain a high quota of allocations to applicants on the Homeless List, following an annual review of the operation of its Allocations Policy. For 2012/13, as a result of the sustained reduction in homelessness presentations, **the Council has reduced its quota of allocations from the Homeless List, (40% (+/-5%) in 2012/13)** (See Priority 2), thus increasing the quotas for Waiting List/Transfer List applicants. The Council will continue to review these quotas annually.
- 11.7.22 In 2008, the Council increased its use of Section 5 Referrals. As a result, local **RSLs allocate approximately 40% of their vacancies to homeless people**, which is similar to the quota for Council vacancies. The Council carries out a 6-monthly review of its nomination arrangements with local RSLs and will amend the Nomination Agreements where necessary.

Assess the impact of Moray Council's recently revised Medical Assessment Procedures

- 11.7.23 On 16 October 2012, following a pilot period, the Council implemented a change to its medical assessment procedures. Under the revised arrangements, medical points are assessed by Housing Needs Officers within the Council's Allocations Team determine the routine medical assessments and award points in accordance with the current points criteria.

In more complex cases, or where there is doubt, expert advice is sought from the Senior Occupational Therapist. Appeals relating to the outcome of medical assessments will be decided by an Independent Medical Advisor provided by NHS Grampian. It is intended that the new process will speed up the medical assessment process, within constrained resources.

Assess the impact of Moray Council's Downsizing Scheme

- 11.7.24 On 17 January 2012, Moray Council approved a Downsizing Incentive Scheme for its tenants for implementation in April 2012. The Scheme is entirely voluntary, and offers both financial and practical assistance to qualifying tenants, to manage a move to smaller accommodation. The Scheme has been publicised on the Council's website, in Access points, and through the Council's tenant's newsletter "The Tenants Voice". The Scheme does not offer qualifying tenants any additional priority (points) on the Council's Transfer List. A review of the first year's operation of the scheme will be carried out by mid 2013.

Complete the Moray Council Allocations Policy Review

- 11.7.25 During 2011/12, Moray Council began a review of its Allocations Policy, through a multi-disciplinary Allocations Policy Working Group. On 30 August 2011, the Council's Communities Committee agreed the areas for potential review/update of the Council's Allocations Policy.

- 11.7.26 This work is still ongoing, but options being considered are:

- The principle that 1 and 2 bed Council housing suitable for older people or ambulant disabled people, i.e. ground floor housing, is allocated to those in greatest housing need, regardless of the number of bedrooms required. This could mean that the Council's 1 and 2 bed ground floor housing lists are combined, with aim that vacancies are offered to households in the greatest housing need.

- 11.7.27 Any major change to the Council's Allocations Policy will require a period of public consultation. This is likely to take place during spring/summer 2013.

Assess the impact of Welfare reform on demand for housing services

- 11.7.28 Changes in entitlement affecting Housing Benefit, Incapacity Benefit, Disability Living Allowance, and various other benefits, will result in £Ms being taken out of the Scottish economy.
- 11.7.29 The changes to Housing Benefit entitlement in particular, due for implementation on 1 April 2013, are likely to have an adverse effect on demand for homelessness services (see Priority 2), as well as having some potential impact on the size and type of housing required. At the time of writing, it was not possible to quantify the impact of Welfare Reform.
- 11.7.30 Throughout the term of this LHS, the Council will regularly reassess any changes in demand for housing and housing/homelessness services.

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

Consider the need for Pressured Area Status Designation renewal

- 11.7.31 The first Pressured Area Status designation to reach its cessation date is Forres on 16 February 2014. Prior to this cessation date, the Council will review the key indicator for Pressured Area Status, i.e. the ratio of affordable relets to Housing List applicants. If justified, the Council will consult all its tenants on the potential for further Pressured Area Status designations. The consultation is likely to take place during autumn 2013.

12 Priority 2: To meet our legal duties to homeless households

12.1 Approach

- 12.1.1 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 2010-2015³¹, Moray will have completed a comprehensive review of its strategic response to homelessness issues.

12.2 Context

- 12.2.1 The Scottish Government has developed a legislative framework for governing homelessness prevention 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.

The Homeless Persons (Unsuitable Accommodation)(Scotland) Order 2004

Code of Guidance on Homelessness Scottish Government, 2005

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.

Homes Fit for the 21st Century, The Scottish Government's Strategy and Action Plan for Housing 2011-2020

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

³¹ Moray Council Homelessness Strategy 2010-2014 available at http://www.moray.gov.uk/moray_standard/page_1917.html#HomelessnessStrategy2010-2015

Local Housing Strategy Guidance, Scottish Government 2008 – states that local authorities are no longer required to produce homelessness strategies. Instead local authorities are required to include plans for homelessness within the Local Housing Strategy. The Guidance requires that LHSs must provide “accurate and comprehensive information on the extent and nature of homelessness within the local area”,

Local Housing Strategies – Mainstream Equality, Scottish Government requires Local Authorities to “action plan at strand (protected characteristic) level and include resources and staffing requirements;

Moray Homelessness Strategy 2010-2015 - the Council recognises the importance of tackling homelessness and feels that the subsequent challenges can be more effectively addressed through a dedicated strategy.

Moray Housing Need and Demand Assessment 2011

Moray Financial Inclusion Strategy

Moray Homelessness Strategy 2010-2015 Equality Impact Assessment

12.3 Key issues and drivers

- 12.3.1 **Economic conditions and affordability** - 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
- 12.3.2 The HNDA 2011 found that **424 affordable homes would be needed each year**, for the next 10 years, and that there is a significant shortfall in availability of affordable housing (see Priority 1)
- 12.3.3 **The number of homelessness applications made to the Council has significantly reduced** from 901 applications in 2009/10 to 520 applications in 2011/12. The number of applicants assessed as homeless has also declined. In 2009/10, 664 applicants were assessed as homeless. This fell to 371 in 2011/12.
- 12.3.4 The characteristics of homeless households have remained consistent in recent years with a **high proportion of single person households** compared to families. The higher proportion of single person households is significant in relation to demand for temporary and permanent accommodation, particularly **1 bed properties**. In 2011/12, 84% of homeless applicants were single. The age range of applicants has also remained consistent with **over a half aged 26-59** and around one third aged 18-25.
- 12.3.5 The main **reasons for homelessness** are “dispute within the household/relationship breakdown – non violent” (23.6%), “asked to leave” (18.4%), and “dispute within the household: violent or abusive” (15.6%). The Council has noted the continuing high number of applicants who are presenting to the Council as homeless due to **relationship breakdown involving domestic abuse**.

- 12.3.6 The vast majority of homeless households have a **local connection** with Moray (95.8%).
- 12.3.7 In 2011/12, **76% of homeless households were unemployed** at the time of their homeless application, increased from 64% in 2010/11.
- 12.3.8 There has been **reducing demand for temporary accommodation**. Analysis of temporary accommodation requirements in 2011 identified that **the right size and location was not always available** to meet identified need and demand. Although smaller properties were identified as having the greatest demand by homeless households, there was an identified shortfall.
- 12.3.9 In 2011/12, Moray had a **higher rate of repeat homelessness**³² 6.8% than the Scottish average (5.8%). This increase however has to be seen in a broader context where homelessness in Moray fell again in 2011/12. There were 26 repeat presentations in 2010/11 compared to 23 in 2011/12.
- 12.3.10 The HNDA found that, in 2010, approximately 5% of Moray's housing stock is privately rented. **The private rented sector is relatively small**, when compared with the Scottish average of 8%.
- 12.3.11 **Housing support** is seen as an essential service for helping vulnerable households to sustain their own accommodation or to prepare them for their own tenancy. In 2011/12, the number of households receiving this service **increased to 200 per month**. This compares to an average of 174 households per month for the previous year.
- 12.3.12 The HNDA 2011 found that the incidence of **homelessness arising from domestic abuse has risen** over the 3 years to 2009/10. Updated information shows that incidence has almost doubled between 2009/10 and 2010/11. Edgar et al (2009) state in their research "**only a tenth (of households experiencing domestic abuse) were able to remain in their own home** either permanently or while they awaited re-housing and less than a tenth were able to move directly from a situation where they experienced domestic abuse direct to permanent alternative housing."³³

³² Where the applicant household was assessed as homeless or threatened with homelessness, and had previously applied and been assessed as homeless or threatened with homelessness and whose previous application had been closed within 12 months of their current application.

³³ Sustaining Tenancies Following Domestic Abuse, Joint Centre for Scottish Housing Research University of Dundee, available at http://www.trp.dundee.ac.uk/library/pubs/sustainingtenancies08_06.pdf

12.4 Key achievements of the Homelessness Strategy

A reduction in homelessness applications, despite an increase in housing options advice cases and the economic recession

- 12.4.1 Prior to 2013, the Council struggled to meet its targets associated with the removal of the priority need test when assessing its homeless applicants, due to the lack of affordable housing. The Council adopted a **housing options approach**, with the principle that early intervention should lead to improved outcomes for homeless households. The Housing Options team, established in October 2010, 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.
- 12.4.2 The impact of this reduction has enabled the Council to achieve the Scottish Government's 2012 abolition of priority need target and has reduced the number of homeless households where the Council has a legal obligation to provide permanent accommodation, a reduction of 46.3% from 2010/11 to 2011/12;
- 12.4.3 A detailed analysis of the key trends and characteristics of homelessness in Moray are presented to the Council's Communities Committee annually.

Reducing Demand for Temporary Accommodation

- 12.4.4 The impact of the Housing Options approach has changed the requirements for temporary accommodation with the following results:
- a saving of £345K in the Council's Homelessness Temporary Accommodation Budget in 2011/12.
 - The Council no longer routinely uses bed and breakfast accommodation for homeless households.
 - No breaches in the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2004 were recorded in 2011/12.
 - The average length of stay in temporary accommodation has reduced by 10.6% between 2010/11 and 2011/12.
 - The Council has been able to accommodate all but one homeless household at the point of homelessness. This was previously identified as a weakness by the Scottish Housing Regulator following their inspection of homelessness services in October 2008.
 - The Council has been able to reduce the number of properties under its Private Sector Leasing Scheme.
 - During 2011/12, 25 Council/ RSL properties were decommissioned from temporary accommodation use, for permanent allocation. The return of these properties assists the Council and RSL's to provide permanent homes for those households who remain on the housing list (see Priority 1).

- 12.4.5 The Council has currently three housing support services registered with the Care Inspectorate. The Homeless hostel service was last inspected on May 2011 and was assessed as 'good'. The Sheltered Housing Support Service was last inspected in March 2012 and was assessed as 'very good'. The Housing Support Service was inspected in August 2012 and was assessed as 'very good'.

12.5 Outcomes – what do we want to achieve?

12.5.1 The agreed outcomes to be achieved through Priority 2 are:

- 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

12.6 Strategy – what will we do to achieve our outcome

12.6.1 The Council recognises that homelessness is an area where prejudice and discrimination are common. The reasons why people become homeless are complex. Individuals at risk from homelessness include people with alcohol and drug issues, people involved with the criminal justice system and people with mental health issues. Homeless people are by definition disadvantaged, and frequently experience more difficulty than others in accessing mainstream services. Therefore, all the actions in this and related strategies are aimed at overcoming disadvantage and tackling the exclusion of those experiencing homelessness.

12.6.2 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 5) and promoting social inclusion (Priority 6).

12.6.3 Actions under this LHS Priority centre on:

- Ensuring provision of good quality advice and assistance on housing options
- Provision of temporary accommodation
- Provision of support services and sustaining housing solutions

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

12.6.4 In the years up to 2010, the Council struggled to meet its targets associated with the removal of the priority need test when assessing its homeless applicants, due to the lack of affordable housing. In October 2010, the Council established a Housing Options Team. This has reduced the number of homeless presentations received by the Council.

12.6.5 People fleeing domestic abuse who seek help from the Council are offered advice from the Housing Options Team. This may result in a homeless application and rehousing from the Homeless Priority List. Provision for permanent housing options to meet this need have been included in the actions detailed under Priority 3.

12.6.6 During the term of this LHS, the focus for housing options will be to continue to:

- Identify households with current or potential housing need and help them to plan to meet that need at an early stage;
- Identify a range of options for households in housing need including all tenures (see Priority 1);
- Ensure appropriate housing support services are available to all who need it to prevent homelessness, and to break the cycle of repeat homelessness. The effect of this approach should ensure that fewer people require assessment under homeless legislation which in turn will reduce the numbers requiring temporary, and then permanent, accommodation. When achieved, the result will be improved sustainable housing outcomes through people moving house when they want to, rather than when they need to.

Ensure that the Council does not intentionally gate keep/ screen households from Homelessness services

12.6.7 The national reduction in homeless applications has seen organisations such as Shelter Scotland raise concerns that the prevention agenda may have allowed “gate-keeping” or “screening”³⁴ to creep back into local authorities homelessness practices, contrary to the Housing (Scotland) Act 1987, as amended. Shelter Scotland have advocated for local authorities to evidence that housing options activities are not being used as a barrier to accessing homelessness services.

12.6.8 The Council intends to examine instances of “lost contact” and repeat homelessness to identify any actions that it can take to lessen such incidences.

³⁴ “Gate-keeping” or “screening” are terms used to describe a deliberate act where local authorities seek to prevent a person from exercising their right to make a homeless application.

Scottish Housing Regulator

- 12.6.9 The Scottish Housing Regulator is seeking clarification of the Council's approach to housing options. In October 2010, the Council introduced a housing options team with the aim of preventing homelessness where it was possible to do so. The work of this team has led to a reduction of homelessness in Moray of 26.5% in 2010/11 and 21.5% 2011/12. Nationally, Shelter have expressed concerns about the apparent impact that housing options and other prevention work is having in terms of reducing homelessness. In response to these concerns, the Regulator has asked a number of local authorities (including Moray) to provide more information relating to their approach to housing options/homelessness prevention. A self evaluation was submitted on 9 November 2012 and the Council is currently waiting for feedback from the Regulator on what has been provided.

Maximise use of the private rented sector to address homelessness

- 12.6.10 The Homeless Persons (Provision of Non-permanent Accommodation) (Scotland) Regulations 2008 permits Councils to discharge their duty to homeless households through housing in the private rented sector. The Council does this where possible, but the private rented sector in Moray is small (only 5% of dwellings), less than the Scottish average (8%). Most of the poorer housing conditions and fuel poverty in Moray exist in the private rented sector (see Priorities 5 and 6). Welfare Reforms are likely to exacerbate current affordability issues in the private rented sector. The Council maintains a Register of Private Landlords and uses it to regulate the sector.
- 12.6.11 The Scottish Government is developing a Strategy for the Private Rented Sector and this is discussed further under Priority 5: Improving Property Conditions.

Maintain and evaluate the Moray Keyfund

- 12.6.12 The Council has recently implemented a revised Moray Keyfund. This is a Rent Deposit Guarantee Scheme which assists homeless or potentially homeless households to access the private rented sector by offering a deposit guarantee of up to £450, lasting a maximum of one year. It is hoped that up to 20 households benefit from this scheme in 2012/13.

Action: Reconfigure temporary accommodation to fit changing demands

- 12.6.13 The changing nature of homelessness, as a result of the Housing Options Team activities, prompted a review of temporary accommodation requirements in 2011. The review found that the right size and location of temporary accommodation was not always available to meet identified need and demand. Smaller properties were identified as having the greatest demand by homeless households requiring temporary accommodation.

- 12.6.14 In October 2011, the Council's Communities Committee agreed that provision should be reconfigured to respond to the changing context of homelessness in Moray. It was agreed a specific target should not be used, but instead a reduction in provision should be administered on a phased basis, using criteria for reconfiguration that would include analysis of homelessness trends, monitoring the level of need, considering the cost of the temporary accommodation and finally reviewing the location, size and concentration of its existing stock. This action is ongoing.

Action: Ensure provision of good quality Housing Support

- 12.6.15 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 Inspectorate³⁵.
- 12.6.16 The Council established a new housing support service in 2010 which is structured around key homelessness themes which include housing options, transitional/tenancy sustainment and specialist support.
- 12.6.17 Although the HNDA 2011 identified a need for an increase in supply of supported housing for people fleeing domestic abuse, the Council will make provision for this needs group through the delivery of an outreach housing support service and improvements to the risk assessment process (MARAC).
- 12.6.18 The Transitional Support and Tenancy Sustainment Team provide ongoing support for vulnerable households who may be homeless or at risk of homelessness. The Council works in partnership with other services/agencies to ensure that these vulnerable people receive appropriate health and support services. In 2011/12, 445 households received a housing support service during the year.

³⁵ <http://www.scswis.com/>

- 12.6.19 In addition, there are three residential services which assist Council to meet its wider strategic objectives in providing housing support services to homeless people. These services are currently contracted to two external support providers who deliver housing support in a residential setting.

Marleon House, Elgin	9 units of temporary accommodation for single females or females with children who have been subjected to, or are at risk of domestic abuse.
Covesea Road, Elgin	10 units of shared accommodation for young people of both genders aged 16 to 24.
Guildry House, Elgin	10 units of shared accommodation. There is no age or gender restriction. The service provides support for those with addictions.

- 12.6.20 During 2012/13, the Scottish Government completed a consultation exercise on options to regulate the delivery of housing support as defined in Section 32B of the Housing (Scotland) Act 1987. The consultation asked local authorities to consider whether housing support services should in future be prescribed and, if so, the potential implications for each local authority arising from this. The Council is currently waiting for the final guidance from the consultation and this is expected in June 2013. Any service or financial implications will need to be considered once this guidance is available.

Action: Participate in the Multi Agency Risk Assessment Conferencing (MARAC)

- 12.6.21 Discussions have taken place with Grampian Police regarding the high number of households who have become homeless due to domestic abuse in Moray. The Police have recently met with the Council and a number of other agencies throughout Grampian, to raise awareness of a new risk assessment tool which they are seeking all services to pilot in the near future. The new risk assessment tool asks 21 risk related questions and can easily be completed as part of the Council's homelessness assessment process.
- 12.6.22 The specific information gathered would assist the Council to consider the suitability of particular forms of temporary accommodation and, where any risk is considered to be substantial, it could request that a multi-agency planning meeting is held to determine how risks can be managed or reduced. On 16 October 2012, the Council's Communities Committee agreed to participate in the Multi Agency Risk Assessment Conferencing (MARAC).

Action: Continue to research homelessness issues and identify good practice

12.6.23 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 North and Island Options Hub.

12.6.24 The Council will continue to work in partnership with other agencies to tackle the underlying issues which cause homelessness. The Council and its partners will continue to develop services and initiatives which tackle the social exclusion, isolation and health needs of vulnerable homeless people. These services will help to improve the life chances of vulnerable homeless people and help to prevent repeat homelessness. This will include services for specific groups such as households experiencing domestic abuse and those considered to have complex needs. (see Priority 3)

Continue to develop Homelessness Service User Involvement

12.6.25 Historically, homeless service users have had very little formal and systematic influence on service delivery and standards, either nationally or locally, and their interests have primarily been served by third sector organisations such as Shelter.

12.6.26 The Scottish Housing Regulator requires that Councils perform their duties on homelessness so that; homeless people get prompt and easy access to help and advice; are provided with suitable, good quality temporary or emergency accommodation when this is needed, and are offered continuing support to help them get and keep the home they are entitled to.

12.6.27 The Social Housing Charter effectively codifies and provides a framework for greater service user involvement, and the outcomes by which local authority services are assessed by the Scottish Housing Regulator.

12.6.28 The Council introduced a Homelessness Service User Involvement Framework in 2011/12.

13 Priority 3: To assist people with particular housing needs

13.1 Introduction

13.1.1 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.

13.1.2 Under this Priority, the Council aims to increase the supply of particular needs housing across all tenures to meet current and projected 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.

13.1.3 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 2011:

- Older people
- People with physical or sensory disabilities
- People with learning disabilities
- People with Autistic Spectrum Disorders (ASD)
- Gypsy Travellers

13.2 Older People

13.2.1 Approach

- 13.2.2 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 sufficient housing which is accessible or readily adaptable to meet the needs of older people, now and in the future.
- 13.2.3 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.

13.3 Context

- 13.3.1 Context is provided through the following frameworks:

Local Housing Strategies – Mainstream Equality, Scottish Government requires Local Authorities to “action plan at strand (protected characteristic) level and include resources and staffing requirements;

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*³⁶ - 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 population³⁷

National Dementia Strategy, Scottish Government June 2010 sets out the government's vision and key actions to transform dementia care and treatment.³⁸

³⁶ 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>

³⁷ 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/>

³⁸ Scotland's National Dementia Strategy available at <http://www.scotland.gov.uk/Topics/Health/health/mental-health/servicespolicy/Dementia/>

*Living Longer Living Better, An Older Peoples Strategy for Moray 2009-2014, Moray Community Health and Social Care Partnership*³⁹ One of this strategy's strategic aims is to provide "an expanded range of housing and care options for older people to have real choice and control about how and where they live".

Moray Housing Need and Demand Assessment 2011 includes assessment of the need for particular needs housing
Local Housing Strategy Equality Impact Assessment (EIA)

13.3.2 In addition to the above statutory and strategic documents, *The Housing Our Ageing Population Panel for Innovation (HAPPI) (2009)* states that "UK housing provision widely assumes that as we age we will wish to stay put in family homes acquired over a lifetime – often houses with gardens – even though the priorities that led us to choose these homes no longer apply. As a result, there is little choice for those who do wish to move. This reinforces the notion that moving is always a last resort. (However) ... case studies show that a housing 'offer' tuned to the priorities of older age can have real appeal, tempting 'empty nesters' and those prepared to plan for future care needs, to trade in homes that have often become a burden, for something new."

13.3.3 There is some cross over between this section on the housing needs of older people, and the next section relating to people with physical and sensory disabilities.

13.4 Key issues and drivers

13.4.1 The HNDA 2011 found that, between 2008 and 2023 there are projected to be :

- 15% more households aged 60-74
- **59% more households aged 75+**
- **166% more single adult households aged 90+**

Older people and the private sector

13.4.2 The Scottish Government's Older Persons Strategy states that "*Older people should be able to find housing that is accessible and meets their needs*". 75% of people aged 60+ are owner occupiers. **The Strategy's stated vision for 2021 "is that a greater proportion of new housing will be suitable for, and attractive to, older people"**. This fits with the NHS policy of facilitating older people's care at home for as long as possible.

13.4.3 The Institute of Public Care have facilitated the development of Moray CHSCP's Joint Commissioning Strategy for Older People. The Institute of Public Care have stated that "*in the future, developments should be of housing suitable for older people rather than the more stigmatising 'older*

³⁹ Living Longer Living Better, An Older Peoples Strategy for Moray 2009-2014, Moray Community Health and Social Care Partnership available at <http://www.moray.gov.uk/downloads/file60988.pdf>

*people's housing'. It should be housing which people look at and welcome with a "wow" rather than housing where the underlying message is, "has it come to this? Housing developments suitable for older people need to offer a choice of tenure, with more options for outright purchase or shared ownership."*⁴⁰ **The HNDA 2011 identified a shortage of housing suitable for older people in all tenures.**

13.4.4 It is widely acknowledged that the majority of older people would prefer to stay in their own homes for as long as possible. However the HNDA 2011 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 medical need, the design and adaptability of the current property, the repairs/maintenance/condition of the current property, fuel poverty and affordability issues, location/ access to services/ 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, and the relatively high market price of bungalows.

13.4.5 The combination of factors; reducing affordable housing investment; demographic changes; continuing affordability problems, will mean that it is **unlikely that the public sector will be able to supply sufficient housing suitable for older people.**

Older people and housing with care

13.4.6 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 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.**

13.4.7 The provision of specialist housing, disabled adaptations, home care and telecare are interlinked in enabling older people to maintain their independence. Key publicly available data shows that **older people in Moray:**

- **are more likely to be receiving home care services** than in most neighbouring local authorities, and in Scotland⁴¹, and those that do...

⁴⁰ Institute of Public Care available at <http://ipc.brookes.ac.uk/services/SHOP/SHOPpaperA1.pdf>

⁴¹ Home Care Services 2011, Scottish Government - Table 1: Total Number of Home Care Clients and Hours of Service Provided by Local Authority

- **receive more hours of home care** per 1,000 population than neighbouring local authorities³⁸
- are **less likely to live in a house that has had a disabled adaptation** than neighbouring local authorities and the Scottish average⁴²
- **have less provision of specialist social housing stock** than the Scottish average. (see HNDA Table 8.10).⁴³
- The HNDA 2011 found that Moray's provision of housing for older people is less than the Scottish average⁴⁴. **Moray's provision of very sheltered/ extra care (supported) housing is almost half that of Aberdeenshire Council.**⁴⁵
- The HNDA 2011 found **care home provision is less than neighbouring local authorities** and the Scottish average⁴⁶.
- The HNDA 2011 found **a need for 63 units** of sheltered OR **extra care housing** and **a need for 32 units of amenity/medium dependency** units, per year, for 10 years

Affordable Housing Allocations Policies

- 13.4.8 The LHS EIA identified that there is **potential for the current Allocations Policies of the Council and some RSLs to disadvantage single person (often older) households requiring sheltered or ground floor/accessible accommodation**. This disadvantage has the potential to be exacerbated as the population ages and demand increases, but also as the stock of accessible/amenity/extra care housing is increased in the form of 2 bed units, following Scottish Government guidance (see Priority 1 Context). Measures to mitigate this potential disadvantage are discussed in detail under Priority 1.

13.5 Outcomes – what do we want to achieve?

- 13.5.1 The agreed outcomes to be achieved through Priority 3, relating to older people are:

- There is an adequate supply of appropriate housing for older people
- There is an adequate supply of housing with support for people with particular needs i.e. for older people

⁴² Scottish House Condition Survey Local Authority Analyses 2009-2011 (Tables 5.2, 5.12 and 5.18)

⁴³ Scottish Government Special Needs Stock LA and RSL Nov 2010

⁴⁴ Housing Statistics for Scotland - Housing for Older People and those with Disabilities. 2012 available at: <http://www.scotland.gov.uk/Topics/Statistics/Browse/Housing-Regeneration/HSfS/SpecialNeedsHousing> .

⁴⁵ HNDA 2011 Para 8.9.6-7, Table 8.10, Figure 8.2

⁴⁶ HNDA 2011 Para 8.9.8 and Table 8.11

13.6 Strategy – what will we do to achieve these outcomes

- 13.6.1 The definition of “older” is subjective, but for the purposes of this LHS, “older” people are defined as aged at least 65 years.
- 13.6.2 This LHS recognises the significant challenges facing housing providers in the context of reductions in public sector funding. This LHS also recognises its key role in contributing to the wider Corporate Outcomes, associated with delivery of Community Care services, and National policies associated with “reshaping care for older people”.
- 13.6.3 For these wider reasons, under this Priority, the LHS focuses on increasing supply of, and influencing the design of, older peoples housing in all tenures.

Increase the supply of amenity housing for affordable rent

- 13.6.4 It is likely that, in the future, older households who need, or wish to move, will prefer amenity/medium dependency housing, or will need 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.**
- 13.6.5 The Scottish Government’s Older Persons Strategy states “it should not be assumed that (older people) want small one bedroom properties. People now reaching older age, who wish to downsize, are likely to want a reasonably-sized property with at least one spare bedroom, giving flexibility so that friends and relatives can visit, maintaining social networks. A spare bedroom can also accommodate a carer. Good storage space is also important. Many older people spend most of their time at home and have a lifetime of possessions, and it supports their mental wellbeing to retain them. Some also have bulky mobility equipment.”⁴⁷ Therefore, **the Council will only develop affordable rented amenity housing with a minimum of 2 bedrooms.** This Action is complemented by proposed amendments to the Council’s Allocations Policy discussed at Communities Committee on 11 December 2012 (see Priority 1).

Increase the supply of owner occupied housing that is suitable for older people

- 13.6.6 The Council has sought the views of local older people on the choice, design, format and tenure of older persons housing in the future, through discussion with the Older Persons Reference Group at their meeting on 10 December 2011. Feedback received from this group is summarised below:
- Self contained, amenity housing, without integral support, should be provided as bungalows, and not as flats. There was a perception that flats increase social isolation, and reduce access to outdoor spaces.
 - Self contained, amenity housing should be provided with the following features:

⁴⁷ 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>

- clusters of small bungalows, where the streetscape facilitates mutual support, self care, and the establishment of a small community
- small, manageable, private, rear gardens.
- bedrooms large enough for 2 single beds.
- bathrooms with the potential for disabled adaptations at minimum cost e.g. level access showers.
- Bathrooms large enough to safely accommodate a level access shower, the client and, potentially, two carers
- Sufficient storage space, not only for household goods, but also for large pieces of mobility equipment e.g. hoists, powered scooters, walking aids
- Any new provision, of any tenure, must be close to shops, health services and public transport.
- The potential for neighbourhood problems /anti-social behaviour due to a mix of age groups was cited as a significant disincentive to moving, even where a house move would otherwise be viewed as positive, desirable and beneficial.
- More research is needed into the potential market for housing which facilitates multi-generational living (granny annexes)

13.7 The Council will seek to influence the design of housing in the private sector, and the potential development of Planning Policies which facilitate the delivery of modestly priced, appropriately designed, readily adaptable, owner/occupied housing to meet the needs of Moray's older and/or disabled people. This is discussed further under Priority 1.

Increase supply of extra care housing

13.7.1 Extra care housing aims to meet the housing, care and support needs of older people, while helping them to maintain their independence in their own accommodation.

13.7.2 Extra care housing⁴⁸ has been viewed as a possible alternative to residential care, and includes a range of specialist housing models. The Personal Social Services Research Unit (PSSRU) found "when matched with a group of equivalent people moving into residential care, costs were the same or lower in extra care housing. Better outcomes and similar or lower costs indicate that extra care housing appears to be a cost-effective alternative for people with the same characteristics who currently move into residential care."⁴⁹ The PSSRU found that "aligned housing management and care arrangements, and incentives to reduce staff turnover should help to keep (the) costs (of extra care housing) down".

⁴⁸ The HNDA 2011 defined extra care housing as "*individual housing units built as a complex, where the occupant holds a secure tenancy, used to provide housing to households in need of a higher level of housing and community care support. Extra Care housing is likely to have communal facilities and social activities. Day care services are often delivered from Extra Care housing complexes.*"

⁴⁹ Improving housing with care choices for older people: an evaluation of extra care housing, PSSRU, July 2011 <http://www.pssru.ac.uk/pdf/dp2774.pdf>

- 13.7.3 During the term of this LHS, the Council aims to achieve an increase in supply of extra care housing. This will require liaison with Community Care Services and the NHS to achieve success. Important links have already been made through housing service representation in the development of the Moray Joint Commissioning Strategy for Older People's Services 2012-2022, and on the Change Fund Governance Group.

13.8 People with physical or sensory disabilities

13.8.1 Approach

13.8.2 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).

13.8.3 Context

13.8.4 Context is provided through the following frameworks:

Welfare Reform Act 2012

Equalities Act 2010

Housing (Scotland) Act 2006

Local Housing Strategies – Mainstream Equality, Scottish Government requires Local Authorities to “action plan at strand (protected characteristic) level and include resources and staffing requirements; *Homes Fit for the 21st Century: The Scottish Government’s Strategy and Action Plan for Housing in the Next Decade: 2011-2020* states that everyone in Scotland should have “A warm and comfortable home, whether they own it, part-own it, rent it privately, or rent from a social landlord.”

Moray Physical and Sensory Disability Strategy

The Scottish Social Housing Charter, Outcome 11: Tenancy sustainment, This outcome covers how landlords can help tenants who may need their home adapted to cope with age, disability, or caring responsibilities.

*Good Practice Guide for the Provision of Major Adaptations, Joint Improvement Team/Scottish Government, December 2010*⁵⁰

Moray Housing Need and Demand Assessment 2011

Local Housing Strategy Equality Impact Assessment (EIA)

13.9 Key issues and drivers

13.9.1 The majority of housing in Scotland was built before 1965⁵¹ when accessibility was not a recognised priority. Therefore, **for many disabled people, improving access to their homes requires equipment and adaptations.**

⁵⁰ <http://www.scotland.gov.uk/Topics/Health/care/EandA/AdaptationsGoodPractice>

⁵¹ Scottish House Condition Survey: www.shcs.gov.uk

13.9.2 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**, and considerably less likely than Moray's neighbouring Local Authorities (see Table 2 below). 6% of Moray households with a LTI/Disability live in a dwelling which has aspects that restrict activity of the disabled household member⁵².

13.9.3 Table 1 below shows that, in 2011, **in the private sector, a smaller proportion of households with a disability had an adaptation**, compared to neighbouring local authorities, and the Scottish average.

Table 2: Proportion of households with a disabled adaptation, public sector and private sector								
Local Authority	Private sector				Public sector			
	Hshlds where at least one member has LTI/ disability		Dwellings with adaptations		Hshlds where at least one member has LTI/ disability		Dwellings with adaptations	
	000s	%	000s	%	000s	%	000s	%
Aberdeen City	17	22%	17	21%	14	56%	10	41%
Aberdeenshire	24	29%	14	17%	10	50%	11	51%
Angus	16	41%	11	27%	6	51%	5	40%
Highland	26	33%	22	27%	14	61%	11	49%
Moray	12	41%	6	19%	5	57%	3	32%
Scotland	484	28%	277	16%	352	56%	200	32%

Source: Scottish House Condition Survey Local Authority Analyses 2009-2011 (Tables 5.2 and 5.12)

13.9.4 In Moray there is **both a lower level of provision of affordable rented housing stock for older people** (48 units per 1,000) (see HNDA Table 8.10), **as well as a lower proportion of dwellings with disabled adaptations in the private sector. Together, these factors mean people with disabilities in Moray are more likely to be living in unsuitable housing.** The reasons for this cannot accurately be determined. However, one scenario could be that, historically, Moray has been under-resourcing both disabled adaptations, and provision of affordable rented housing for people with mobility problems.

13.9.5 A recent report by the Office for Disability Issues, DWP, HM Government by the University of Bristol "Better outcomes, lower costs"⁵³ states that **there is potential for disabled adaptations to deliver significant savings on the costs of Community Care services.** The report concludes that "where

⁵² Scottish House Condition Survey – Local Authority Report 2008-2010 available at <http://www.scotland.gov.uk/Publications/2011/11/SHCSLA0810>

⁵³ "Better outcomes, lower costs", Office for Disability Issues DWP, HM Government Haywood and Turner, 2007 available at: <http://odi.dwp.gov.uk/docs/res/il/better-outcomes-report.pdf>

(disabled adaptations) are an alternative to residential care, or prevent hip fractures or speed hospital discharge; where they relieve the burden of carers or improve the mental health of a whole household, they **will save money, sometimes on a massive scale**".

- 13.9.6 **There is a shortfall in the number of disabled adaptations currently funded, across all tenures/landlords.** The Scottish Household Condition Survey estimates that there are 138,000 dwellings where adaptations are required by householders across Scotland, 2,000 of them in Moray⁵⁴. The HNDA 2011 has, for the first time in Moray, attempted to quantify the projected number of major disabled adaptations⁵⁵ that would require public funding in future (HNDA Para 8.7.16). Currently 308 adaptations per year are provided. The HNDA 2011 found that **funding should be provided for 394 disabled adaptations across all tenures, each year for the next 10 years, i.e. an increase of 28%**, due to the ageing population alone.
- 13.9.7 The LHS Equality Impact Assessment (see Section 5 above) identified a **potential negative impact on disabled people across all landlords/tenures**, if budgets for disabled adaptations were not increased to accommodate the needs of the ageing population.
- 13.9.8 **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 and there is **anecdotal evidence that some RSL tenants are experiencing extended waiting times for adaptations**.
- 13.9.9 **There is a shortfall in provision of specialist wheelchair accessible housing, across all tenures.** The HNDA 2011 identified 40 households on the Council's housing list, having been assessed as requiring specialist wheelchair accessible housing. Recent new build activity has provided appropriate affordable rented housing for some, but not all. Although the numbers of households in need are small, most of these households are **amongst those in the most acute housing need** on the Council's Housing List, and have limited housing options.
- 13.9.10 **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

⁵⁴ Scottish Household Conditions Survey Local Authority Analyses 2009-2011 Table 5.15: www.shcs.gov.uk

⁵⁵ For this purpose "major adaptations" are works such as structural alterations e.g. level access shower, stairlifts, and not less costly works e.g. handrails, grab rails.

Priority 1 (Address Housing Need and Improve Access to housing), and Priority 3 Particular Needs (Older People).

13.10 Outcomes – what do we want to achieve?

13.10.1 The agreed outcome to be achieved, relating to people with physical or sensory disabilities, through Priority 3 is:

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

13.11 Strategy – what will we do to achieve this outcome

13.11.1 This Strategy recognises the significant challenges facing housing providers in the context of reductions in public sector funding. This Strategy also recognises its key role in contributing to the National policies associated with “reshaping care for older people”, and the Corporate outcomes associated with delivery of community care services.

13.11.2 During the term of this LHS, the Council will increase the supply of accessible housing in all tenures by:

13.12 Increase the supply of accessible, affordable rented housing

13.12.1 In September 2012, the Council and RSL partners completed a volume procurement initiative which delivered 295 new build properties for affordable rent and 20 new build shared equity properties (MVPI3) across developments in Elgin, Forres and Buckie. Each development has included a small number of fully wheelchair accessible properties, and a number of 2/3 bed amenity properties. The design of these specialist properties have included generic features commonly required by people with disabilities e.g. level external access, en-suite accessible shower rooms and level access showers, and are compliant with Housing for Varying Needs⁵⁶. These properties have been designed to be easily adaptable, to be tailored to individual needs e.g. ceiling track and hoist, clos-o-mat, lowered kitchen units.

13.12.2 The efficiency of this new build activity has been dependant upon co-operation between the building contractor, their suppliers and sub-contractors, the landlord (Council or RSL), the OT Service and the client themselves.

13.12.3 The Council will continue to include specialist housing in future affordable housing developments included in the Strategic Local Programme/SHIP, in accordance with local needs.

⁵⁶ Housing for Varying Needs, a design guide, Scottish Homes 2002 available at <http://www.archive2.official-documents.co.uk/document/deps/cs/HousingOutput/start.htm>

13.12.4 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 effective use of limited affordable housing subsidy. This strategic decision has implications for the Councils and RSLs allocations policies. As part of the review of its Allocations Policy, commenced during 2012/13, the Moray Council decided that all single person households assessed as requiring wheelchair accessible housing, should be considered for 2 bed housing, to provide a greater likelihood of receiving an offer of rehousing. This decision is linked to other changes arising from the Council's Allocations Policy review detailed under Priority 1.

13.12.5 Further research is required into the feasibility of extending this policy change to households on RSLs Housing Waiting Lists. This issue is discussed detail under Priority 1.

13.13 Improve the delivery performance of disabled adaptations across all tenures/landlords

13.13.1 A report by the Office for Disability Issues, DWP, HM Government by the University of Bristol "Better outcomes, lower costs" considers the detrimental impacts on households where there is a delay in delivery of a disabled adaptation, and the waste, both in financial and human terms that can occur through these delays. This waste includes "the costs of social care given whilst waiting, outstripping the cost of the adaptation".

13.13.2 Community Care colleagues intend to develop a Local Improvement Measure⁵⁷ which will identify the time taken to deliver disabled adaptations from the client's perspective, across all tenures. The Council and MCHSCP have agreed to liaise to deliver a project which will develop the data required for this measure, and which will make recommendations for efficiencies/improvements in the delivery process. When this data is available, the Council and its RSL partners will consider an appropriate benchmark/target wait time to measure performance against.

13.13.3 There are fundamental differences in the obligations of different landlords to fund disabled adaptations. The LHS EIA has identified this as a negative impact on disabled people. The Council's Occupational Health Team has reported, anecdotally, they have experienced difficulties in securing disabled adaptations for their clients who are RSL tenants. When available, the Local Improvement Measure B2 (see Para 5.7.2 above) may provide evidence of this.

⁵⁷ Joint Improvement Team, Reshaping Care for Older People, Local Improvement Measure, B2 available at <http://www.jitscotland.org.uk/action-areas/reshaping-care-for-older-people/improvement-measures/>

Scottish Government review of disabled adaptations

- 13.13.4 The Scottish Government has established an Adaptations Working Group⁵⁸ which has carried out a consultation on the future organisation and funding for housing adaptations for older people and disabled people.
- 13.13.5 The Council's response to this consultation states that "RSLs should be treated in the same way as Councils and should have a statutory requirement to carry out adaptations to meet tenants' needs. The current situation is wholly unacceptable and means that RSL can opt out to carry out adaptations if they cannot access funding from Scottish Government sources. This means that the delivery of adaptations is driven by the category of social landlord rather than by the needs of tenants. "
- 13.13.6 SHFA have published a response which states "We are duty-bound to our members (and in turn to their tenants) to highlight the inherent unfairness of expecting housing association and co-operative tenants to absorb the cost of adaptations provision, effectively through a surcharge on their rents, when they are already subsidising private sector provision as Council Tax payers. There is not, nor should there ever be, any statutory obligation upon housing associations and co-operatives to fund adaptations: this is a health and social care responsibility."
- 13.13.7 The Scottish Government's Adaptations Working Group published its final report in November 2012. The report contains recommendations for a person-centred, tenure neutral approach to the delivery of adaptations. The report also recommends that the local housing authority should be responsible for strategic planning for adaptations and that a single integrated local budget should be created to fund adaptations across tenures. The report recommends that the local authority would be responsible for managing this budget.

⁵⁸

<http://www.scotland.gov.uk/Topics/Built-Environment/Housing/access/ROOPH/ADWG>

13.14 People with learning disabilities

13.14.1 Approach

13.14.2 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.”

13.14.3 Context

13.14.4 The context is provided through the following frameworks:

Welfare Reform Act 2012
The National Strategy for Learning Disability in Scotland “Same as You”, 2000
Moray Learning Disability Services Strategy 2007 - 2010
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.
Local Housing Strategies – Mainstream Equality, Scottish Government requires Local Authorities to “action plan at strand (protected characteristic) level and include resources and staffing requirements;
Moray Housing Need and Demand Assessment 2011
Local Housing Strategy Equality Impact Assessment (EIA)

13.15 Key issues and drivers

13.15.1 The Moray Learning Disability Strategy 2007-2010⁵⁹ 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.

13.15.2 The HNDA 2011 found that provision for 4-5 people with learning disabilities in accommodation with 24hr support, will be required each year, for the next 10 years, **with peaks of need in 2013/14 and in 2016**. This assessment makes allowance for clients expected to move from Children’s Services into Adult Services during the analysis period (10 years). However, the Moray Community Health and Social Care Partnership’s Joint Commissioning Strategy will include a further needs assessment for people with learning disabilities but, at the time of writing, the findings were not available.

⁵⁹ The Moray Learning Disability Services Strategy 2007 – 2010 is available at http://www.moray.gov.uk/moray_standard/page_47311.html

13.15.3 Although, **recent investment in re-provisioning** of supported housing for people with learning disabilities has resulted in a significant improvement in the quality of accommodation, it **has only resulted in a small net increase in supply of placements**.

13.15.4 Since the HNDA's completion, **detailed needs assessment work has commenced**, associated with the development of the Moray Community Health and Social Care Partnership's Joint Commissioning Strategy 2012 – 2020. These **findings will supersede the HNDAs findings** for this needs group but, at the time of writing, the findings were not available. Should this work identify the need for new supply housing, following robust needs assessment, this will receive priority for funding within the Strategic Local Programme/SHIP.

13.16 Outcomes – what do we want to achieve?

13.16.1 The agreed outcome to be achieved, relating to people with learning disabilities, through Priority 3 is:

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

13.17 Strategy – what will we do to achieve our outcomes

13.17.1 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.

13.17.2 The Moray Learning Disability Strategy states its intention to “establish a process with TMC Housing Services to ensure adults with learning disabilities, who are able to manage, and/or require single or shared tenancies, are able to access them in a timely fashion (in line with the Learning Disability Eligibility Criteria)”.

13.17.3 Where Social Workers or other professionals identify a client with learning disabilities who requires to be rehoused, the client would generally receive Homeless Priority status and receive an appropriate offer of housing as soon as possible, in accordance with the Council's Allocations Policy. The nature of the care and support package commissioned by the Moray Health and Social Care Partnership forms an important consideration in determining the most appropriate type of housing for each individual.

13.17.4 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 for whom more mainstream housing with an appropriate support package is appropriate, will be taken forward under Priority 1.

13.18 People with Autistic Spectrum Disorders

13.18.1 Approach

13.18.2 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.

13.19 Context

13.19.1 Autism is a lifelong neuro-developmental disorder more commonly referred to as autistic spectrum disorder. Autistic Spectrum Disorders are not learning disabilities. Autistic Spectrum Disorder (ASD) is an umbrella term for a very wide range of impairments, which impact on individuals in very different ways and with varying severity. Some individuals are able to live independently, but others need very specialist support.

13.19.2 Although autism is often associated with a person's behaviour, it is important to recognise that autism is not a behavioural problem and that observable behaviours arise as a result of a range of complex and interacting factors.

13.19.3 The context is provided through the following frameworks:

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.

The Scottish Strategy for Autism, The Scottish Government, November 2011

A Strategy for Adults in Moray with Autism 2011 – 2014, Moray Community Health and Social Care Partnership provides a 3 year framework for delivering better outcomes for adults with autism who do not have co-existing Learning Disabilities

Moray Autism Partnership Board

Local Housing Strategies – Mainstream Equality, Scottish Government requires Local Authorities to “action plan at strand (protected characteristic) level and include resources and staffing requirements;

A practical guide for Registered Social Landlords: Housing and Autism Spectrum Disorder (ASD), Glasgow City Council March 2010

13.20 Key issues and drivers

13.20.1 Recent studies suggest that a rate of **around 1 in 100** is currently the best estimate of the prevalence (of ASD) in children”⁶⁰ Based on this prevalence,

⁶⁰ The Strategy for Adults in Moray with Autism 2011 – 2014

the Strategy for Adults in Moray with Autism estimates **there are 781 people in Moray with ASD**, though not all will have a formal diagnosis.

13.20.2 The Strategy for Adults in Moray with Autism 2011 – 2014 estimates there are 430 adults with learning difficulties in Moray. **Approximately 10% of these adults with learning difficulties also have a diagnosis of ASD.** This is consistent with national trends. This is the group most likely to be in greatest need of specialist housing provision.

13.20.3 “Adults with autism and their families/carers face many challenges in their daily lives, including barriers to accessing services, public misconceptions coupled with a lack of awareness of the condition, difficulties in securing long-term and meaningful employment and the opportunity of having a good quality of life. This is not a situation unique to Moray but a national issue. **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.”⁶¹

13.20.4 The Strategy for Adults in Moray with Autism 2011 – 2014 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.

13.21 Outcomes – what do we want to achieve?

13.21.1 The agreed outcomes to be achieved, relating to people with autistic spectrum disorders (ASD), through Priority 3 is:

- 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

13.22 Strategy – what will we do to achieve our outcomes

Consider development of a Practical Guide similar to Glasgow's

13.22.1 Glasgow City Council published a Practical Guide for Social Landlords: Housing and Autism Spectrum Disorder (AS) on the 16 March 2010⁶², which

⁶¹ A Strategy for Adults in Moray with Autism 2011-2014, Moray Health and Social Care Partnership available at <http://www.moray.gov.uk/minutes/data/HC20120808/Item%209-Appendix-ASD%20Strategy.pdf>

⁶² Example: <http://www.glasgow.gov.uk/en/News/Archives/2010/March/autismhousingguide.htm> and <http://www.glasgow.gov.uk/NR/rdonlyres/8326FB52-88DD-469D-8D75-DDBC21E99A3A/0/PracticalGuideforRSLsHousingASDmarch10.pdf>

they believed to be the first document of its kind in the UK. The Guide is based on research carried out with people with autism, their families and carers as well as public agencies e.g. Community Care, Police. The Guide states “housing practitioners are often unaware of the particular housing issues and needs of households with members with ASD have and are therefore, unable to respond appropriately”. “The Guide is intended as a training note to assist RSLs and other housing agencies in meeting the housing needs of households with members with ASD through examples of practical situations and solutions”. Moray Council could consider development of a similar Guide.

Deliver ASD awareness training to housing staff

- 13.22.2 This LHS could assist The Strategy for Adults in Moray with Autism 2011 – 2014 to deliver its strategic aim to “increase awareness and understanding of autism for staff”, by delivering awareness training to Council and RSL staff. Moray’s Autism Partnership Board is developing a training service which might be appropriate.

ASD and Allocations Policies/Medical Assessment Procedures - Number of Bedrooms

- 13.22.3 People with ASD can disturb the sleep patterns of siblings, with detrimental effects on health and education. They need their own space to allow them to de-stress and organise their environment in the way they wish. The Council’s and RSL’s Allocations Policies and Medical Assessment Procedures should acknowledge this need and ensure that there is provision to allow an adequate number of bedrooms for individuals with ASD to have their own room, should this be required.
- 13.22.4 Moray Council’s Allocations Policy and Medical Assessment procedure allows for additional bedrooms to be allocated to families affected by ASD, where supported by an OT’s recommendation. Each RSL is responsible for developing its own Allocation Policy.
- 13.22.5 Rehousing offers should consider housing options that minimise the risk of anti social behaviour issues affecting the person with ASD.

ASD and Disabled adaptations

- 13.22.6 Some children with ASD have very little awareness of their own safety and the safety of others. This will often go beyond requirements for the normal childproofing of a house. Specific adaptations for households with children with ASD may include extra garden fencing, lockable cupboards and doors, locks on windows, lockable stair gates, 2 way locks, and isolation switches for appliances. It is also important to be aware of climbing or jumping hazards like stairwells.

13.23 Gypsies/Travellers

13.23.1 Approach

13.23.2 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 Moray⁶³. 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”.

13.24 Context

13.24.1 The context is provided through the following frameworks:

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.

The European Convention on Human Rights

The Human Rights Act 1998

The Trespass (Scotland) Act 1865

The Criminal Justice and Public Order Act 1994

Local Housing Strategies – Mainstream Equality, Scottish Government requires Local Authorities to “action plan at strand (protected characteristic) level and include resources and staffing requirements;

Guidelines for managing unauthorised camping by gypsies/travellers in Scotland, Scottish Executive, 2004

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 2011

Local Housing Strategy Equality Impact Assessment (EIA)

⁶³ Protocol and Guidelines for the Response to Unauthorised Camping in Moray available at: http://www.moray.gov.uk/moray_standard/page_51689.html

13.25 Key issues and drivers

13.25.1 In May 2009, the Council, in partnership with Aberdeen City Council and Aberdeenshire Council, carried out **research into the housing needs of Gypsies/ Travellers throughout Grampian**⁶⁴. The researchers have recommended local authorities take steps to achieve the following 4 outcomes:

- Outcome 1: **better planning** by local authorities and partner organisations to anticipate, and plan to meet, the future needs and aspirations of Gypsies/Travellers in Grampian.
- Outcome 2: Gypsies/Travellers normally resident in Grampian and Gypsies/Travellers visiting the area have **accommodation that meets their needs**, culture and lifestyle;
- Outcome 3: Individual support and community development needs are identified and met;
- Outcome 4: **Better and more constructive relationships** are developed between Gypsies/Travellers and settled communities

The findings in the HNDA 2011 were based on this research. The HNDA 2011 found **a need for 23 pitches**⁶⁵ **for Gypsies/ Travellers in Moray**, and suggested the pitches should be provided in small groups in a variety of locations across Moray.

13.25.2 On 11 August 2009, the Council's Communities Committee agreed a revised Protocol and Guidelines for the Response to Unauthorised Camping in Moray. The Protocol and Guidelines state that "although it may be seen as desirable that Moray aligns its policy regarding unauthorised encampments with its neighbouring authorities, unlike Aberdeen City Council, Aberdeenshire Council and Highland Council, the **Moray Council currently has no authorised Halting Site** for Gypsies/Travellers. This causes significant difficulties in managing encampments."

13.25.3 In 2009, unauthorised encampment activity was concentrated in 9-12 local authorities which included Moray⁶⁶.

13.25.4 On 7 December 2010, the Council's Communities Committee agreed "that **no further action to be taken with regard to the 2 proposed halting sites** in Arradoul and Kingsmeadow, Forres because of major concerns regarding road safety at both sites and also because of the financial cost needed on this non statutory requirement"⁶⁷

⁶⁴ Accommodation Needs Assessment of Gypsies/Travellers in Grampian, May 2009

⁶⁵ The researchers "recommended that these figures are taken as guidance only and not as an exact calculation of need"

⁶⁶ 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>

⁶⁷ Moray Council Community Services Committee Minutes (Item 5) available at <http://www.moray.gov.uk/minutes/data/CC20101207M0.pdf>

13.25.5 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.

13.26 Outcomes – what do we want to achieve?

13.26.1 The agreed outcome to be achieved through Priority 3 relating to Gypsies/Travellers is:

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

13.27 Strategy – what will we do to achieve our outcomes

13.27.1 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”.⁶⁸

13.27.2 On 19 February 2013, the Planning and Regulatory Services Committee agreed a draft policy framework for considering planning applications for Gypsies/Travellers sites. This Policy will be subject to a period of public consultation.

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

⁶⁸ Moray Local Development Plan Main Issues Report is available at http://www.moray.gov.uk/moray_standard/page_51210.html

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

14.1 **Approach**

- 14.1.1 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.

14.2 **Fuel Poverty**

- 14.2.1 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. A person is deemed to be in extreme fuel poverty if more than 20% of household income is spent on household fuel use.

- 14.2.2 The 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

- 14.2.3 The Scottish Fuel Poverty Statement considers fuel poverty to be a general sub-set of poverty with fuel poor households most likely to be also low income households.

14.3 **Context**

The *Housing (Scotland) Act 2001* places a statutory duty on the Scottish Government to eradicate fuel poverty, as far as is reasonably practicable, by 2016

The *Housing (Scotland) Act 2001* requires councils to develop local housing strategies which among other things ensure "so far as reasonably practicable that persons do not live in fuel poverty". This obligation relates to all housing tenures.

In June 2012, the Scottish Government announced a new funding programme to deliver energy efficiency measures to homes in areas of high fuel poverty. These measures are to be delivered within the framework of the *National Retrofit Programme*, the *Green Deal* and the accompanying *Energy Company Obligation (ECO)*.

14.4 Key issues and drivers

14.4.1 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%⁶⁹. The SHCS estimates that 12% of households in Moray (approximately 5,000 households) are in extreme fuel poverty compared with a Scottish average of 8%.

14.4.2 The causes of fuel poverty are linked to the exposure of households to fuel poverty high risk factors. The prevalence of these factors in Moray is detailed below:

- **Households living in detached houses compared with other property types such as flats** – Moray has a higher level of detached houses (41%) than the Scottish average (21%)⁷⁰
- **Households living in dwellings with 0-2 'poor' National Home Energy Rating (NHER) scores, i.e. in properties with poor fuel efficiency** – the SHCS estimates that 8% of dwellings in Moray (over 4,000 properties) have an NHER of 0-2 compared with a Scottish average of 3%.
- **Households living in older dwellings** – In Moray, only 28% of pre-war dwellings have a “good” NHER of 6-10 compared to the Scottish average of 60%.
- **Older smaller and single pensioner households** – Moray has a higher number of single pensioner households (39%) than the Scottish average (33%). The SHCS estimates that 53% of pensioner households in Moray are in fuel poverty compared to a Scottish average of 49%
- **Households where their income is less than £100 per week** – Moray is one of the lowest average income areas in Scotland.
- **Households in rural areas** – the whole of Moray is classified as a rural. The Scottish Government’s 6 Fold Urban-Rural Classification classifies the most densely populated areas of Moray as “accessible rural” and the rest of Moray as “remote rural”. Rural areas have a high proportion of off-gas grid pre-1919, “hard-to-treat” detached and semi-detached properties.

⁶⁹ Scottish House Condition Survey 2009-2011 LA analyses Table 8.10

⁷⁰ Estimates of Households and Dwellings in Scotland 2011, Table 5, General Register Office for Scotland

14.4.3 The SHCS estimates that 34% of private sector households in Moray (around 10,000 households) are in fuel poverty compared with 30% in the social rented sector (around 3,000 households). Over 70% of households in Moray are in the private sector.

14.4.4 Dwellings with poor energy efficiency are more likely to be found in the private housing sector. Social rented dwellings in Moray have generally good levels of energy efficiency. At 31 December 2012, 89% of the Council's stock (around 5,000 dwellings) met the energy efficiency requirements of the SHQS. Of the 774 non-compliant Council houses, 438 were either off-gas or hard to treat and therefore exempt from the energy efficiency requirements of the SHQS. The remaining 336 non-compliant properties will achieve the SHQS by 2015. 77% of dwellings met the Council's "Moray" standard, which requires a greater depth of loft insulation than the SHQS. Most of the RSL stock in Moray was built after 1980 to modern standards and is fully compliant with the SHQS.

14.4.5 During the life of the LHS, both the Council and the other social landlords in Moray will deliver capital investment programmes to ensure that their stock meets the SHQS by 2015 and beyond. This means that a key challenge for the LHS will be to ensure that energy efficiency measures are delivered to fuel poor households in the private sector, specifically, those living in the following properties:

- Pre-war dwellings with solid-wall construction or hard-to-treat cavities
- Properties that are off mains gas
- Properties that have not received loft and cavity-wall insulation
- Properties with inefficient heating systems and poor insulation standards in doors and windows
- Properties in rural areas, which have a higher proportion of "off gas", pre-1919 properties with solid wall construction
- Pre-1919 solid-wall properties in historic town centre locations

14.4.6 In Moray, there are no significant concentrations of deprivation and energy inefficient housing. Only one datazone (South Lesmurdie/Kingsmills) falls within the 20% most deprived in Scotland, Owing to the socio-economic profile of their residents rather than poor housing,)⁷¹. Households in these areas would therefore be at greater risk of fuel poverty due to low income than the poor energy efficiency of their homes. There will also be other low income households dispersed across Moray, many in remote rural areas, who will be at high risk of fuel poverty.

14.4.7 Energy advice agencies offer a range of services that can help households address fuel poverty. These services 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. Since, 2010/11,

⁷¹ Scottish Index of Multiple Deprivation, Local Authority Summaries SMID 2012 available at <http://simd.scotland.gov.uk/publication-2012/>

householders in Moray have been able to access free energy advice by telephone from the North East Energy Saving Advice Centre (ESSac). The ESSac has been responsible for delivering the Energy Advice Programme (EAP), which prioritises fuel poor and vulnerable households for energy assistance. However, -nlike neighbouring local authorities, Moray does not have a locally-based service comprehensive home-based energy advice to residents.

- 14.4.8 The evidence provided by the SHCS is based on a small sample and can provide only historic estimate of fuel poverty. The SHCS measures fuel poverty using a model which combines the energy efficiency of homes, fuel prices and income. However, due to rapidly changing fuel prices the data can be quickly out-of-date, a problem exacerbated by the time-lag between reporting and the period reported, which can be more than 2 years. The Council does not have access to a robust database that will identify the locations of energy inefficient stock and fuel poor households and which can measure the performance of actions in contributing to fuel poverty outcomes.

14.5 Climate Change

14.5.1 Context

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. By December 2020, improved design and energy efficiency in housing will have made a contribution to Scotland's commitment to reduce energy consumption by 12% and greenhouse gas emissions by 42%.

Introduced by *the Energy Act 2011*, the Green Deal is a UK Government sponsored framework allows householders to install energy efficiency measures to their homes and to pay for them out of the savings made on their fuel bills. The Green Deal aims to reduce carbon emissions by improving the energy efficiency of domestic properties.

The Scottish Government's sustainable housing strategy consultation document, Homes that Don't Cost the Earth, sets out its vision for warm, high quality, affordable, low carbon homes and a housing sector that helps to establish a successful low carbon economy across Scotland.

The Council's Draft Climate Change Action Plan sets out how the Council will contribute to achieving the national carbon emissions targets.

The Council is currently preparing a *Sustainable Design Guide* which will be adopted as supplementary planning guidance.

14.6 Key Issues and Drivers

- 14.6.1 **Housing is a significant contributor to carbon emission levels.** Around 25% of greenhouse gas emissions derive from houses. Delivering measures to improve domestic energy efficiency in both new and existing housing stock will be crucial to meeting climate change objectives.
- 14.6.2 **Homes in Moray have relatively poor energy efficiency.** The average National Home Energy Rating (NHER) for housing in Moray is 5.8 compared with a Scottish average of 6.7. The reasons for the poor energy efficiency of dwellings in Moray are described in the preceding section on fuel poverty.
- 14.6.3 Buildings with solid wall construction and hard-to-treat cavities are significantly more expensive and technically difficult to insulate. The Home Energy Efficiency Database (HEED) estimates that there are **over 2,000 properties in Moray with solid wall construction**. Due to the high cost of solutions such as external insulated cladding, householders are often deterred from improving the energy efficiency of “hard to treat” properties. External cladding can also transform the appearance and character of traditional buildings in a way that may not be acceptable to owners or local planning policy.
- 14.6.4 The Scottish Government’s sustainable housing strategy, “*Homes that Don’t Cost the Earth*” sets out the role the housing sector will be expected to play in contributing to the achievement of carbon reduction targets. A key element of the strategy will be the introduction of higher standards of energy efficiency for both existing and new housing. This will be achieved by:
- Successive changes to the Building Standards requiring higher levels of energy efficiency in new housing leading towards zero carbon housing by 2016
 - Introduction of new Energy Efficient Standard for Social Housing based around the Energy Performance Certificates
 - Introduction of standards of energy efficiency for the private housing sector
- 14.6.5 The introduction of new energy efficiency standards will impact on the cost of new housing developments and will also require landlords and home owners to undertake investment in their homes. Securing the resources required to improve the energy efficiency of homes will be a major challenge for the housing sector as a whole.

14.7 Key Achievements – previous LHSs

14.7.1 The objective “**to eradicate fuel poverty as far as is reasonably practical by 2016**” has been the key fuel poverty of both the previous LHS 2004-2009 and the Interim LHS 2010-13. The focus of actions has been to understand the nature of fuel poverty in Moray, to raise awareness of fuel poverty and to deliver programmes to improve fuel inefficient stock.

14.7.2 The key achievements of these LHSs have been:

- The Moray Energy Efficiency Advice Project (MEEAP) delivered by SCARF between 2008 and 2011 provided advice to over 5,000 households in Moray and also delivered energy advice on a community-wide basis and to organisations.
- Since 2010/11, the North East Energy Saving Advice Centre (ESSac) has provided advice to over 5,000 householders in Moray.
- The ESSac has referred around 600 low income households in Moray for assistance under Stage 4 of the Energy Assistance Package (EAP) to access grants for insulation measures and heating systems.
- Under the Universal Home Insulation Scheme (UHIS), free loft and cavity wall insulation measures have been delivered to 1,483 households across Moray
- Between 2004 and 31 December 2012, the percentage of Council dwellings achieving the SHQS increased from 44% to 89%. During this period, the Council’s investment programme provided around 630 homes with new heating systems, including over 100 off gas mains properties with energy-efficient heat pumps, along with other works to improve the energy efficiency of the fabric of a number of dwellings.
- At 31 December 2012, 77% Council properties met the Moray Standard.
- Since 2008, over 500 energy efficient heat pumps have been installed in new affordable houses provided by the Council and by housing associations
- Council new build homes have incorporated underfloor heating and high levels of insulation
- All affordable homes delivered by the Moray Strategic Local Programme for 2012-15 will be built to the higher greener standard, meeting Section 7, Silver Level, of the 2011 Building Regulations in respect of both Carbon Dioxide Emissions and Energy for Space Heating.

14.7.3 SHCS data on fuel poverty will assist the Council in assessing the impact of the LHS fuel poverty actions on achieving the outcome of reducing fuel poverty in Moray. Nevertheless, it should be noted that despite significant progress in improving the energy efficiency of homes during the period of the Interim LHS, fuel poverty levels could actually increase as a result of rises in fuel prices and/or reductions in incomes caused by conditions in the employment market and changes to benefits.

14.8 Outcomes – what do we want to achieve?

14.8.1 The agreed fuel poverty outcome to be achieved through Priority 4 are:

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

14.9 Strategy – what will we do to achieve our outcomes

14.9.1 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.

14.9.2 By improving the energy efficiency of dwellings and minimising home energy use, actions to address climate change are closely linked to actions to address fuel poverty. Whilst the Council proposals to address fuel poverty will result in significant carbon savings from the homes of the fuel poor, there are many households in Moray who are not classified as fuel poor but live in homes with poor energy efficiency. Therefore actions to improve the energy efficiency of dwellings will also need to be directed to non-fuel poor households.

14.10 Improving the energy efficiency of houses

14.10.1 During the term of this LHS, the Home Energy Efficiency Programme for Scotland (HEEPS) will be the key Scottish Government scheme for improving the energy efficiency of existing homes through the installation of measures such as insulation, new heating systems and windows. HEEPS will be funded by the Scottish Government with additional resources levered in from energy companies under the **Green Deal** and the **Energy Company Obligation (ECO)** framework. Under ECO, energy companies have an obligation to promote energy-efficiency measures to the homes of poor and vulnerable households and "hard to treat" properties with prohibitively high costs to install energy efficiency measures. From 1 April 2013, the HEEPS/Green Deal/ECO framework will replace energy efficiency schemes such as UHIS and CERT.

14.11 A key action will be to deliver energy efficiency measures to the homes of fuel poor households in Moray.

14.12 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 HEEPS/Green Deal/ECO framework and other related programmes.

14.12.1 Local authorities, working in partnership with the energy companies, will be expected to take the lead role in securing HEEPS/Green Deal/ ECO funding for their areas and in developing appropriate delivery models for a major programme of energy efficiency installations. As well as meeting fuel poverty priorities, the Scottish Government expects that the programme delivery model will seek to stimulate economic growth by providing business opportunities for local firms and employment opportunities for local people. In this respect there are the delivery model is strongly linked to the economic growth and local employment objectives of the Moray Economic Strategy.

14.13 A key action for the LHS will be for the Council to develop and implement a delivery model for theHEEPS/Green Deal/ECO in Moray.

14.14 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.

14.14.1 **A key action of the LHS will be to support initiatives to deliver community energy schemes in Moray.** There may be opportunities in Moray to promote Community Energy Schemes, particularly as a solution to addressing energy efficiency issues in off-gas rural areas.

14.15

14.16 A key action for the LHS will be to promote high standards of energy efficiency and low carbon, sustainable design in the building of new homes in Moray.

14.17 In pursuing this action, the Council and affordable housing providers will aim to ensure that all new homes provided by the Moray Strategic Local Programme will be built to the Scottish Government's "greener" standards requirements. The Council, local housing developers and partners in the construction industry would also be expected to work together to make the best use of innovative construction methods and emerging technologies and to develop an innovative model of sustainable design that will aim to deliver achieve zero carbon housing in Moray. All housing developers would be expected to maximise the subsidies available to deliver sustainable and energy efficient housing

14.17.1 During the lifetime of the LHS, the local affordable housing providers will be required to comply with current and emerging energy efficiency standards for their housing stock:

14.18 Key actions for the LHS:

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

- **implement the requirements of the Social Housing Energy Efficiency Standard.**

14.18.1 During the lifetime of the LHS, it is intended that supplementary planning guidance will be introduced in the form of a **Sustainable Design Guide** which aims to ensure that sustainability is considered at an early stage in the building design process to maximise the potential for reductions in energy use.

14.19 A key action for the LHS will be to introduce the Sustainable Design Guide as part of local planning policy

14.19.1 Other key LHS actions to improve the energy efficiency of housing:

- **Explore opportunities to extend the gas grid network in Moray**
- **Promote cost-effective, technical solutions for improving the energy efficiency of hard-to-treat properties.**

14.20 Providing Energy Advice Services in Moray

14.20.1 A review will need to be carried out to assess whether the current level energy advice services in Moray will maximise the opportunities available to households to address fuel poverty. Given the potential complexity of the Green Deal funding and delivery arrangements, it is also important that householders can access the advice they need to access opportunities to improve the energy efficiency of their homes.

14.21 A key action under the LHS will be to 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.

14.21.1 A key LHS action will be **to 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.**

15 **Priority 5: To improve the condition of Moray's housing stock**

15.1 **Approach**

15.1.1 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.

15.1.2 **Key characteristics of Moray's housing stock:**

- There are a total of 42,115 properties in Moray
- Almost 27,000 (65%) of the stock is owner-occupied
- The social rented sector makes up around 21% of the housing stock
- Moray Council is the largest social landlord with almost 65% of the social rented stock (around 5,800 houses). The remainder is mainly owned by housing associations with 21% of the social rented stock (around 2,000) and Defence Housing Executive (DHE) with 14% (around 1,200) (see HNDA Table 5.1).
- 6% of Moray's housing stock is privately rented
- Approximately 1,800 homes in Moray are vacant.

15.1.3 Although house conditions in Moray are 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) estimates that 29% of Moray dwellings (around 12,000 properties) require urgent repair compared with a Scottish average of 37%.

15.1.4 Flood risk affects a number of properties in areas across Moray. There are a total of five major flood alleviation schemes in Moray, three of which were complete as at 31 December 2012 and two were under construction. The two under construction will protect 600 residential properties in Elgin and 768 in Forres. These properties will remain vulnerable to flooding until construction is complete in 2015. However, there are other flood risk areas within Moray where a flood scheme has not been promoted.

15.1.5 Priority 5 addresses the condition of housing in relation to the fabric of buildings, their state of repair and their amenities. Issues concerning the energy efficiency of building are addressed under Priority 4.

15.1.6 As solutions for improving house condition are different between tenures, this section considers the private housing sector separately from the social rented sector.

15.2 The Private Housing Sector In Moray

15.3 Context

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* where a number of houses are substandard, or where housing adversely affects the amenity of an area.

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 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 Moray Economic Strategy and Elgin, City of the Future (ECFTF) are the twin strategies that will underpin sustainable economic growth and diversification across Moray and will promote the comprehensive redevelopment of Elgin city centre

Scottish Government's Strategy for Housing for Scotland's Older People aims to deliver care for older people in the comfort of their own homes rather than in institutional settings. A key aspect of this strategy is to providing older people with suitably adapted homes in a good state of repair.

From 1 April 2013, the Scottish Government will be giving Councils powers to levy an *additional council tax charge on long-term empty properties*. A key aim of the proposals is to encourage owners to bring empty properties back into use.

15.4 Key Private Sector House Condition Issues

- 15.4.1 **Poor house condition is a significant problem in the private sector.** The SCHS estimates that 32% of private sector dwellings (10,000 properties) require urgent repair compared with 21% (2,000 properties) in the social rented sector⁷². The HNDA 2011 found that "urgent disrepair is more prevalent in the private rented (28%) than in owner occupied properties (22%)"⁷³.

⁷² Scottish House Condition Survey 2009-11 Local Authority Analyses, Table 4.8

⁷³ HNDA 2011 Table 5.15 Moray Stock Condition Estimates, page 55

- 15.4.2 In March 2011, there were 372 dwellings on the Council's register of Below the Tolerable Standard (BTS) stock in Moray. All BTS properties were in the private sector with higher levels in the Keith, Speyside and Cairngorm National Park Housing Market Areas.
- 15.4.3 Of the estimated 1,800 empty properties in Moray, all in the private sector, it is estimated that 30% (over 500 dwellings) are in urgent disrepair.
- 15.4.4 Flood risk affects private sector homes in Elgin, Forres and other parts of Moray
- 15.4.5 The Moray **Private Sector Scheme of Assistance (SofA)**, introduced in 2009, 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. Since the introduction of the SofA, the Council has gradually reduced the financial assistance offered to owners for improvements and repairs. Between 2009/10 and 2012/13, the total Private Sector Housing Grants (PSHG) budget reduced from £1.248mm to £0.785m.
- 15.4.6 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 prioritisation of support for older owners contributes to local and national objectives to care for the ageing population in the comfort of their own homes rather than in expensive institutional settings (see Priority 3).
- 15.4.7 For owners out with the priority group, the SoFA provides mainly information and practical advice to assist them meet their maintenance and repair responsibilities. Financial assistance is not offered to owners of BTS stock and those requiring urgent repairs to their homes.
- 15.4.8 In other local authorities, private sector condition surveys have found owners have a limited awareness of their repair and maintenance responsibilities. It likely that this is also the case in Moray and that a cultural change in attitude towards repair responsibilities will be required from owners if the SofA is to provide an effective tool for improving private sector house condition.

- 15.4.9 **The resources available to improve private sector house condition are restricted.** The key principle underpinning SofA is that owners should pay for repairs and improvements themselves with the Council signposting them to suitable sources of finance in the private market. When SofA was first introduced, many owners may have been in a position to access to home loans fairly easily but credit restrictions in recent years have severely limited this source of funding for many owners, particularly those on low incomes. This affordability issue could be particularly evident in Moray, given that it is one of the lowest wage economies in Scotland.
- 15.4.10 Due to ongoing constraints on Council finances, it is anticipated that the PHSB budget will be subject to ongoing pressures during the life of the LHS and that the limited resources will continue to be allocated to priority groups in greatest need. This will clearly place limitations on the ability of the Council to assist owners who cannot afford the cost of essential repairs and could result in increasing levels of private sector repair during the life of the LHS.
- 15.4.11 The gap in funding the costs of repairs could be filled by powers given to the proposed National Lending Unit (NLU) under the Housing (Scotland) Act 2006. At the time of writing, the position is unclear on progress with establishing the NLU but it could prove to be an invaluable resource in enabling owners to access funding to improve the condition of their property.
- 15.4.12 The Council offers discretionary grant to elderly and vulnerable owners for essential repairs and improvements but budget restrictions have limited the number of grants that can be offered. In 2009/10, of the total PSHG budget of £1.248m, £0.574m was allocated to discretionary grants. By 2012/13, the discretionary element of the budget had reduced to £0.136. The Council is aware that some older owners in Moray are unable to afford the cost of repairs without grant assistance. The reduced budget would therefore impact on the ability of this group to carry out essential repairs to their homes.
- 15.4.13 **The Council has not used of Enforcement Powers to improve private sector house condition.** Under the SofA, the Council will seek to identify houses that are substandard and will consider the designation of a Housing Renewal Area (HRA) where there are a significant number in an area and 50% of these are below the tolerable standard. To date, the Council has not designated any HRAs or used any of the other powers available under the 2006 Housing (Scotland) Act to compel owners to improve substandard property. This is due in part to the pattern of disrepair in Moray which is not evident on an area basis but rather at an individual house level, often in remote rural locations. As a result, Moray does not have significant concentrations of unpopular, poor quality private housing for which the designation of a HRA would offer an effective approach to improvement. However, this approach could change if in future it became apparent that housing across a particular area was falling into disrepair or was designated as a high strategic priority for improvement.

- 15.4.14 The Elgin, City for the Future (ECFTF)⁷⁴ identifies a rolling programme of improvements to key buildings within the historic townscape of Elgin as an important component of the City Centre regeneration strategy. Many of the privately-owned pre-1919 buildings in the Town Centre have flats on the upper floors and the Housing Renewal Area and other enforcement powers could assist in securing the required improvements. These powers could also assist in maintaining the historic built fabric and architectural heritage in other towns in Moray as part of a wider regeneration strategy.
- 15.4.15 The Council's Environmental Health service receives a number of complaints each year from householders about the poor condition of neighbouring properties. The Council can serve a Maintenance Order on such properties requiring the owner to submit a Maintenance Plan. The Council can also take enforcement action when an owner fails to carry out the work detailed in the plan. This action could involve the Council arranging for the work to be carried out and then billing the owner for the cost.
- 15.4.16 The costs of enforcement activity, including that associated with HRAs and maintenance plans, will have a cost implication which would need to be paid from the PSHG or from another dedicated source. At present, there is no allocation within the PSHG budget to meet the cost of enforcement and therefore the implications for this budget would need to be carefully considered as part any wider use of enforcement powers to improve sub-standard property.
- 15.4.17 As well as offering grant assistance to elderly and vulnerable clients, SoFA offers this priority group the support of Care & Repair Services to assist them through the often complex process of delivering adaptations and repairs to their homes. The cost of this service is funded from the PSHG budget.
- 15.4.18 The provision of Care & Repair services is part of a preventative approach to care expenditure is being promoted at a local level by the Council's health and social care partners and a national level by the Scottish Government's Strategy for Housing for Scotland's Older People. Housing is one of the key themes of the Moray Community Health and Social Care Partnership's Change Plan, which aims to shift the balance of care for older people in Moray away from institutional settings towards anticipatory care and preventative spend. By enabling older people to stay at home longer, Care and Repair services make an important contribution to the objectives of the Living Longer Living Better, An Older Peoples Strategy for Moray 2009-2014, Moray Community Health and Social Care Partnership⁷⁵ and the achievement of the Council's outcomes under Priority 3.

⁷⁴ Moray Economic Strategy and Elgin – City for the future available at http://www.moray.gov.uk/moray_standard/page_75361.html

⁷⁵ Living Longer Living Better, An Older Peoples Strategy for Moray 2009-2014, Moray Community Health and Social Care Partnership available at <http://www.moray.gov.uk/downloads/file60988.pdf>

- 15.4.19 **The Council has limited intelligence on the location and nature of disrepair in the private sector.** The Council has not carried out a Private Stock Condition Survey since 1998. The information on disrepair provided by the SHCS survey is based on a small sample of households in Moray and this means that it has a large statistical margin of error and crucially does not identify the location of stock in disrepair. Whilst a stock condition survey would provide a more reliable estimate of the level of private sector disrepair and could assist in targeting investment activity to where it is most needed, given the absence of grant funding careful consideration would need to be given to the potential uses and value of a survey.
- 15.4.20 **There is a high level of disrepair in the private rented sector.** The Council can also use powers under the Private Landlord Registration Scheme to ensure private rented properties meet minimum standards of condition. The Council's Landlord Registration Scheme was introduced in 2006. Under the Registration scheme, private landlords are required to ensure that their property meets the Repairing Standard and action can be taken against landlords whose property fails to meet the standard.
- 15.4.21 **Many empty properties are in poor condition.** Of the estimated 1,800 empty properties in Moray, all in the private sector, it is estimated that 30% are in urgent disrepair and 140 are BTS, occupancy prohibited or awaiting demolition⁷⁶
- 15.4.22 The Council has responded positively to the Government's proposals to give local authorities additional **powers to increase Council Tax on empty properties.** The Government intends that the application of the new powers will encourage owners to bring their property back into use. However, there may be obstacles to bringing properties back into use if the cost of improvement is prohibitively high and/or beyond the means of the owner.
- 15.4.23 National Research carried out by Shelter suggests that tackling empty homes cannot be achieved on a "piecemeal" basis but must be done on a strategic basis, using a variety of measures, and in partnership with other agencies. In 2009, the Scottish Government in partnership with Shelter established the Scottish Empty Homes Partnership to help councils and their partners to bring private sector empty properties back into use. To date, there has been only a limited strategic approach to empty homes in Moray and the Partnership could provide an invaluable resource in guiding the development of an appropriate strategy for Moray. Such a strategy would need to address disrepair in empty homes as well as the potential impact of the new tax raising powers as a means of effecting improvements in house condition.

⁷⁶ Moray Council Tax Register as at 22 September 2011, Solicitors Property Centre Website as at 22 September 2011

- 15.4.24 **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.
- 15.4.25 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 Council's research into the private rented sector⁷⁷ found that the private rented dwellings most likely to be BTS or in need of repair are to be found in the remote rural areas across Moray. Council tax records indicate that around 11% (218 properties) long-term empty homes in Moray are in remote rural locations.
- 15.4.26 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 investment required to bring these up to standard is often prohibitively expensive. Between 2008 and 2011, the Rural Housing Enabler (RHE) worked with a number of the estates to identify ways in which empty dwellings could be brought back into use. At that time, grant was available from the Scottish Government to help with the cost of repairs. Despite the activities of the RHE, there was no take-up of grant. The RHE also investigated the possibility of long-term lease arrangements for rural empty properties involving housing associations. Again, interest from the Estates in this initiative was disappointing.

15.5 The Social Rented Sector In Moray

15.6 Context

The Scottish Housing Quality Standard (SHQS) was introduced in 2004 and is the Scottish Government's principal measure of housing quality in the social rented sector in Scotland. By April 2015, all social landlords must ensure that their dwellings pass all elements of the SHQS.

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 Council's Housing Asset Management Strategy and Standard Delivery Plan aim to ensure that its housing stock meets the SHQS by 2015 maintains the standard thereafter

The Moray Housing Standard seeks to achieve a higher standard than the SHQS for the Council's housing stock by 2015 and beyond.

⁷⁷ Developing a Private Rented Sector Strategy in Moray, Edgar and Williams, May 2005

15.7 Key Social Rented Sector House Condition Issues

- 15.7.1 Housing in the social rented sector is generally in good condition.** As at 31 December 2012, 89% of the Council's stock met the SHQS. As well as meeting the SHQS, the Council aspires to achieve a higher "Moray" standard for its stock. This standard will provide higher levels of loft insulation, kitchen storage and electrical provision. As at 31 December 2012, 77% of the Council's properties complied with the Moray standard.
- 15.7.2 Only 11% of the stock is of non-traditional construction. A 2002 survey of the non-traditional stock found that none of the houses inspected had any serious structural defects but recommended that the Council carry out annual checks of these properties.
- 15.7.3 The HNDA found that 85% of RSL stock met the SHQS.
- 15.7.4 Social housing providers have plans to ensure that their stock meets the SHQS by 2015 and maintains these standards thereafter.** The Council's Housing Asset Management Strategy indicates that its housing stock will achieve the SHQS by 2015. The investment requirement to achieve this are identified in the Housing Business Plan and the SHQS Standard Delivery Plan. The Council's investment programme is based on a 2006 stock condition survey which found that almost 56% of its properties (3,660 dwellings) were deemed to fail the SHQS. The Council's Business Plan indicates that the Council can achieve the SHQS and Moray Standard without increasing rents beyond the assumptions of inflation plus 1%.
- 15.7.5 It is anticipated that at this stage there will be no major issues for the Council in terms of meeting the SHQS by 2015. The main element of SHQS failure within the Council's stock is under the Energy Efficiency criteria (details of this are provided in Section 14.4.4). 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 using Green Deal and ECO finance to fund the required improvements.
- 15.7.6 It is anticipated that the Council's ongoing housing investment programme will ensure that its housing stock complies with the Moray Standard by 2015.
- 15.7.7 It is anticipated that RSL stock in Moray will meet the SHQS by 2015. This is because much of RSL stock has been built in recent years or has been refurbished on acquisition.
- 15.7.8 Houses in the social rented sector are affected by flood risk.** The Council has set aside a substantial reserve fund from the HRA to meet the cost of damage to its properties. The Council has also invested in flood guards to 247 properties in Elgin. It is anticipated that flood risk properties in Elgin and Forres will be protected by the flood alleviation schemes scheduled to complete in 2015.

15.7.9 It is likely that that after 2015, social rented properties will be required to meet a new SHQS. The Scottish Government has indicated that the energy efficiency requirements of the SHQS level will not be sufficient to meet the 2020 and 2050 targets set out in the Climate Change (Scotland) Act 2009. The Government is currently consulting on a new energy efficiency standard for social housing that will go beyond the requirements of the SHQS that will significantly reduce carbon emissions from the social housing sector and help alleviate fuel poverty. The potential implications of this for the Council and RSLs in delivering energy efficiency measures to existing stock are covered under Priority 5.

15.8 Key Achievements – previous LHSs

15.8.1 Private Sector

- Owners are given good quality advice and support through the Scheme of Assistance to help them repair, maintain and improve their houses and to meet the cost of works
- Care and Repair Services have been delivered to elderly and vulnerable households in the private sector since 2004
- Since 2004, the Council has provided over 1,400 grants to owners in the private sector to enable them to repair and improve their property. This amounts to a total investment of £7.400m. Adding the owners' contribution to the cost of the grant-assisted works gives a total private sector housing investment of over £9m
- The Council's Landlord Registration Scheme has been operational since 2006

15.8.2 Social Rented Sector

- The Council and RSLs have made significant progress towards ensuring that their housing stock meets the SHQS by 2015
- The Council has made significant progress towards ensuring that its housing stock meets the Moray Standard by 2015
- The Council's has established an Asset Management Strategy which sets out the financial framework and delivery mechanisms required to ensure that its housing stock is maintained in good condition and complies with statutory and regulatory requirements

15.9 Outcomes – what do we want to achieve?

15.9.1 The agreed outcomes to be achieved through Priority 6 are:

- People live in houses of good quality

15.10 Strategy – what will we do to achieve our outcomes

15.10.1 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 financial and other 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.

15.10.2 Actions in the social rented sector

- Ensure that all social rented housing stock in Moray meets the SHQS by 2015 and beyond
- Ensure that Council houses meets the Moray Standard by 2015 and beyond

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

16.1 **Approach**

- 16.1.1 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.

16.2 **Context**

The Housing (Scotland) Act 2001 requires all local authorities to produce a strategy for tenant participation. This allows tenants to take part in landlord decision making processes and influence decisions about housing policies, conditions and related services.

The Antisocial Behaviour etc. (Scotland) Act 2004 [41], the Moray Council has a statutory obligation to evaluate and investigate all incidents of antisocial behaviour (ASB) reported to them.

The Local Government in Scotland Act 2003 introduced a legal duty for local authorities and key partners to take part in community planning. This involves improving the quality of public services by engaging local in their planning and delivery.

The Moray Community Planning Partnership seeks to engage with local partners and community groups in planning and improving the delivery of services to communities in Moray

The Housing (Scotland) Act 2010 (the Act) made provision for the establishment of the Scottish Social Housing Charter in which the Scottish Government sets out the standards and outcomes that social landlords should aim to achieve when carrying out their housing activities. The charter includes outcomes and standards in relation to the maintenance and safety of neighbourhoods and tenant participation.

16.3 **Key issues and drivers**

- Moray is one of the least deprived areas in Scotland 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). Only 1 of Moray's data zones (in Elgin) is in the 20% most deprived. This datazone represents 0.9% of Moray's datazones and is deprived for non-housing factors, such as income, health and education 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.

- 16.3.1 **Residents of Moray are generally satisfied with their neighbourhoods.** The Council's 2012 Tenants Survey found that 87% of tenants were satisfied with their neighbourhood as a place to live
- 16.3.2 **Anti-social behaviour is the community safety issue of most concern to residents in Moray.** 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.
- 16.3.3 The three most predominant types of ASB were noise complaints, rowdy behaviour and vandalism. 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.
- 16.3.4 In 2011, the Council's planning service introduced the Urban Design Guide in an effort **to improve the design quality of new housing developments.** The Guide, which supports the principles of the Scottish Government's "Designing Places" and "Designing Streets", aims to help developers design good quality, safe and sustainable neighbourhoods with streets that are less dominated by the car. To encourage community integration, the Urban Design Guide suggests that developments should aim to deliver mixed-tenure neighbourhoods and provide suitable accommodation for a broad range of households, including older people.
- 16.3.5 The Council has adopted the Urban Design Guide as a material consideration when determining planning applications. The qualitative design framework provided by the guide together with its place within the local planning process will play an important role in encouraging planners, developers and social housing providers to work together to create successful places in Moray. The Scottish Government's draft Sustainable Housing Policy suggests that the provision of greener homes should be a guiding principle underpinning the design of sustainable neighbourhoods. The Urban Design Guide, together with the actions to provide greener homes set out under LHS Priority 4, aim to promote sustainable neighbourhoods by delivering new energy efficient housing in locations that minimise transport costs through good connectivity with other areas.
- 16.3.6 During the period of the LHS, it is expected that the major part of the supply of new social housing in Moray will be delivered by way of the developer contributions required by local planning policy. This means that private developers will take the lead in designing most new housing developments. Many private developers are resistant to providing social housing on the same site as private housing and would prefer to provide alternatives to on-site affordable housing delivery, such as the payment of commuted sums or off-site delivery. This resistance from developers has created a barrier to delivering mixed-tenure developments in Moray.

- 16.3.7 **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.
- 16.3.8 **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. The network of RTOs operating in Moray are 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 RTOs as well as setting aside an environmental budget to be used for local improvements identified by the tenant forums.
- 16.3.9 The number of RTOs operating in Moray declined from 6 in 2009 to 3 in 2012 with the remaining forums struggling for membership. The Tenant Core Group has worked with the Council's Housing Service to improve the general level of tenant engagement with the activities of the forums, particularly among younger tenants. Although the level of tenant satisfaction with the quality of Council housing management services has been consistently good, tenant responses to consultation on housing policies and service issues have been low. 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.
- 16.3.10 The Moray Social Inclusion Strategy is the overarching strategy for tackling inequality and social inclusion in Moray. A key priority in the implementation of the strategy has been to regenerate disadvantaged communities through measures to promote financial inclusion, employability and improved health.

16.3.11 The Moray Safer Communities Partnership was established to oversee community safety work in Moray and activity required to meet the Council's obligations under the Antisocial Behaviour Act 2004. The partnership includes representation from the main agencies carrying out safety activity in Moray, including the Council and Grampian Police, The Partnership funds an antisocial behaviour unit to support its community safety work and employs full-time Community Wardens, funded by the Council, to deliver a diverse range of community safety work in areas across Moray. This work includes attending incidents of anti-social behaviour and issuing fixed penalty notices for fly tipping, litter and dog fouling. The Council's Housing Service works closely with other agencies within the partnership to address issues of antisocial behaviour experienced by Council tenants.

16.4 Key Achievements – previous LHS

- The Council and its community safety partners have worked together to deliver a raft of measures to tackle different forms of antisocial behaviour within communities, including noise nuisance, dog litter, vandalism, rowdy behaviour and rubbish/litter.
- The Council and other social landlords' have implemented Tenant Participation Strategies.
- The Community Planning Partnership has enabled local people to identify and deliver priorities that are important to their local areas and will contribute to achieving National Outcomes.
- Housing developers are required to meet the requirements of the Urban Design Guide when designing housing developments.
- Residents in Moray are generally satisfied with the physical condition of their neighbourhoods.
- Since its establishment in 2009, the Safer Communities Partnership has overseen a raft of actions to tackle different forms of antisocial behaviour, including litter, dog fouling and neighbour nuisance.

16.5 Outcomes – what we want to achieve

16.5.1 The agreed outcomes to be achieved through Priority 6 are:

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

16.6 Strategy – what will we do to achieve our outcomes

- 16.6.1 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
- 16.6.2 Improve tenant and customer engagement with the work of the Council's Housing Service
- 16.6.3 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. The Council plans to review its Urban Design Guide during 2013/14 to ensure up to date guidance, and examples of best practice, are available.
- 16.6.4 Contribute to community sustainment and social exclusion initiatives in rural areas in Moray
- 16.6.5 Council and partners to continue to engage in the community planning process
- 16.6.6 Council and Community Safety partners, including Grampian Police, to continue to work together to deliver effective antisocial behaviour and community safety activities
- 16.6.7 Council and partners to contribute to the implementation of the Moray Social Inclusion Strategy

17 Monitoring and Evaluation

17.1 The preceding sections of this LHS have detailed the outcomes Moray Council would like to achieve for the citizens of Moray, and the actions it will take to achieve them. To complement this the Housing Strategy Group have agreed an Action Plan (Appendix 4) and a Performance Framework (Appendix 5).

Monitoring

17.2 Monitoring involves recording of what has/has not been achieved and gives a record of the outputs. The monitoring process will record which of the actions have been completed.

17.3 The Housing Strategy Group will report annually on the progress of each action in the Action Plan to service Committee and will make the reports available on the Council's website. The LHS Action Plan, and associated targets, will be regularly reviewed and updated throughout the term of this LHS.

Evaluation

17.4 Evaluation seeks to measure the wider impact of the actions of the LHS. Evaluation allows judgements to be made of the effectiveness of the longer term outcomes of an action or series of actions, e.g. the number of affordable homes built is a direct output of the LHS that can be recorded through the monitoring process. However, the outcome of having these new affordable houses (or the impact that these houses make) can only be measured by evaluating them, e.g. Is there a reduction in the levels of homelessness? Are there fewer people in housing need? Are there fewer people living in fuel poverty?

17.5 The LHS Performance Framework has been created to measure the wider impact of the LHS. The framework comprises of:

- The Outcomes – what we want to achieve
- The indicators (KPIs) – features of the outcome that can be measured so we can assess how effective it is. These indicators predominantly use publicly available data sources. To avoid duplication, the indicators predominantly match those currently used for other purposes within the Council.
- Baseline and targets – the 'numbers' that show how much progress has been made..
- Data Sources – where the information will come from.

17.6 The framework needs to be flexible because the LHS is subject to external influences and shares objectives with other strategies, e.g. Older Peoples Strategy. At this stage, some of the indicators and targets have yet to be fully developed. It is intended that, in each Priority area, the direction of travel of these KPIs, taken together, will provide a good indication of whether or not the agreed Outcomes are being achieved. These KPIs will be regularly reviewed and reported annually to service Committee.