

National Planning Framework 4: Position Statement

Scottish Government

February 2021

Only the questions answered are listed below.

2. Do you agree with our current thinking on planning for resilient communities?

Housing built to greater accessibility standards for older and disabled people

Age Scotland welcomes that the work on Housing to 2040 is also being considered while work is ongoing on the NPF4, it is essential that these strategies complement each other and that we can start to see more of the homes that Scotland needs to be built being built. It is concerning that there is currently an interim period where new build building is going ahead without any improvement to accessibility standards for those who need it. The review of accessibility standards that has been committed to as part of the NPF4 needs to happen as a priority, as the house building industry is not going to make the changes required without it becoming a mandatory part of their planning permission.

The need for targets, reporting and monitoring at the local authority level

According to the Equality and Human Rights Commission's Report on Housing and Disabled People in Scotland, only 17% of Scottish local authorities set a target for accessible or adaptable housing.¹ This number is far too low and demonstrates why the NPF4 should introduce targets and reporting and monitoring obligations on local authorities to ensure this situation is remedied swiftly.

This same report found that only 41 per cent of Scottish local authorities had carried out an Equality Impact Assessment on the Local Development Plan.² With the range of strategies and planning documents that will be alongside the NPF4, it is essential that equalities and the needs of groups such as older and disabled people are explicitly considered and consulted on at every stage.

Two important recommendations from the report are that local authorities should ensure that a minimum of 10 per cent of new housing is built to wheelchair-accessible standards and that local authorities must also meet the Public Sector Equality Duty when planning new housing.³ Age Scotland fully supports these recommendations as a minimum target, and they should be embedded in the NPF4.

A new report, 'Senior Housing in Scotland', has analysed the housing available for older people in each local authority area compared with the population estimate of people over 65. It has found that the levels of supply are lowest in Orkney (1%) and Fife (2%), while

¹ <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-scotland-hidden-crisis-long-summary.pdf>

² <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-scotland-hidden-crisis-long-summary.pdf> Page 9

³ <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-scotland-hidden-crisis-long-summary.pdf> Page 10

Dundee (17%) and Aberdeen (10%) have higher than the average supply.⁴ It starkly demonstrates the divergence in availability in homes that are specifically designed for older people across Scotland.

Co-housing and different housing models

There are many reports that look into the potential benefits of promoting co-housing and other housing models that could allow older people to live well in the community. Housing our Ageing Population: Panel for Innovation (HAPPI) have produced a report that demonstrates some of the success stories from abroad.⁵

It would be worth looking at how these types of projects could be supported by local authorities or by the Scottish Government through the use of pilot projects. Age Scotland is aware of how difficult it can be for potential co-housing schemes to get the support that they need to become viable projects and this is unlikely to change without direct support from the Scottish Government.

4. Do you agree with our current thinking on planning for better, greener places?

Public involvement without relying on only digital means of engagement

It is important to point out how many older people do not use the internet and the potential for exclusion if public engagement becomes digital by default. Over 500,000 people in Scotland over the age of 65 do not use the internet.⁶ This lower rate of internet use among older people is starker in the most deprived areas of Scotland, where only half of people over 60 use the internet.⁷

While the Coronavirus pandemic has meant that people's access to information has largely moved online, it will be important that engagement with the public does not take a purely digital approach and that people who do not use the internet are still given the opportunity to have their say on changes to their community.

⁴ 'Senior Housing in Scotland: a development and an investment opportunity?',

<https://www.emerald.com/insight/content/doi/10.1108/JPIF-10-2020-0119/full/html>

⁵ <https://www.housinglin.org.uk/Topics/type/The-Housing-our-Ageing-Population-Panel-for-Innovation-HAPPI-Report-2009/>

⁶ <https://www.gov.scot/publications/scotlands-people-annual-report-results-2018-scottish-household-survey/pages/7/>

⁷ <https://www.gov.scot/publications/scottish-household-survey-2019-key-findings/pages/9/>