**Planning (Scotland) Bill -Stage 3**

June2019

**Introduction**

Age Scotland welcomes the opportunity to brief MSPs in advance of the above debate. We have worked with MSPs on a cross party basis to improve the Bill and called for several of the changes which were agreed at Stage 2.[[1]](#footnote-1)

The independent review of the planning system which was published in May 2016 placed a particular emphasis on the “delivery of more high-quality homes”.[[2]](#footnote-2) Age Scotland takes the view that planning policy must anticipate the long-term needs of Scotland’s ageing population, and start to plan now to deliver the different types, tenure and size of homes which will be urgently required for the future.

Age Scotland welcomes the recognition of older people’s housing as a specific need in the revised 2014 Scottish Planning Policy.[[3]](#footnote-3) However the Planning (Scotland) Bill has provided the opportunity to go further still and to establish the housing needs of older and disabled people as a policy principle within national and local development plans.

Age Scotland believes this is vital given the housing issues, and challenges, arising from the demographics of Scotland’s ageing population. This underlines the need to invest in housing for older people and disabled people, and to address their housing needs. By way of further background, Scotland’s population of older people is projected to increase significantly between 2012 and 2037, with the number of people aged 65 and over projected to rise by 59% from 930,000 to 1,470,000[[4]](#footnote-4).

As Scotland’s population ages there will be a requirement for particular types of housing which meets the specific needs of older people, and are specially adapted for people living with dementia, people who have mobility issues, people with disabilities and people who have a sensory impairment. This will require a proper mix of new and adapted homes for rent, and to buy, and for different income levels.

**Key asks at Stage 2 which passed:**

Age Scotland called for several of the changes which were made to the Bill at Stage 2. These key asks were:

1. **Prioritise housing for older people in the National Planning Framework (NPF).[[5]](#footnote-5)**
2. **Introduce national targets for older and disabled people’s housing. [[6]](#footnote-6)**
3. **Introduce a requirement for consultation with older people in developing the National Planning Framework (NPF)[[7]](#footnote-7)**
4. **Prioritise the housing needs of older and disabled people in local development plans.[[8]](#footnote-8)**
5. **Require local development plans to identify land designated for older people’s housing.[[9]](#footnote-9)**
6. **Introduce a duty to provide information about the housing needs of older and disabled people’s housing[[10]](#footnote-10)**
7. **Ensure local development plans include targets to address the housing needs of older and disabled people.[[11]](#footnote-11)**
8. **Ensure that planning authorities consider the use of Dementia and Age friendly design when preparing their local development plans.[[12]](#footnote-12)**
9. **Place a duty on Scottish Ministers to report to the Scottish Parliament “as soon as practicable” after two years.[[13]](#footnote-13)**

**PLANNING (SCOTLAND) BILL – STAGE 3 RECOMMENDATIONS**

**AMENDMENT 22 (National Planning Framework). Age Scotland welcomes this.**

**AMENDMENTS 24 & 35 (National Targets for older and disabled peoples housing). Age Scotland calls on MSPs to reject.**

**AMENDMENT 32 (Consultation on National Targets). Age Scotland calls on MSPs to reject.**

**AMENDMENT 83. (local development plans – Evidence Report). Age Scotland calls on MSPs to support.**

**AMENDMENT 67 (local development plans – form and content). Age Scotland calls on MSPs to support.**

**AMENDMENT 60 (local development plans – local targets). Age Scotland calls on MSPs to reject.**

**AMENDMENT 62 (Age and Dementia friendly design). Age Scotland calls on MSPs to reject.**

**AMENDMENT 53 (Parliamentary Report). Age Scotland calls on MSPs to reject.**

**1. Prioritise housing for older people in the National Planning Framework (NPF)**

The National Planning Framework (NPF), introduced by Part 1A of the Town and Country Planning (Scotland) Act 1997 (The 1997 Act), has a strategic role to play in the development, and use, of land in Scotland, and in the setting of national infrastructure priorities.

Age Scotland takes the view that the NPF, and the non-statutory Scottish Planning Policy can make a significant contribution to addressing the challenges of Scotland’s ageing population in key areas such as housing. **Age Scotland welcomes the changes to the Bill to embed the housing needs of older people and disabled people within the planning system and its processes, by amending the** **NPF to ensure it gives specific priority to housing for older people and disabled people , and to meeting the housing needs of older people and disabled people.**

**Age Scotland believes it is necessary to ensure that a strategic, co-ordinated approach is taken at the national level to address the housing needs of older people and disabled people, and to provide that planning authorities, developers, the third sector and other key agencies take a consistent approach across Scotland to addressing their needs. Without this strategic approach there is a real risk that the housing needs of Scotland’s ageing population will go unmet and will reach crisis point.**

**AMENDMENT 22**

**National Planning Framework**

Age Scotland recognises that the Scottish Government has sought to maintain, within the Bill, the need to address housing for older people as a policy principle for development plans nationally. This amendment sets out high level outcomes for the National Planning Framework (NPF) to achieve. This includes: “meeting the housing needs for older and disabled people.” Under Section 3A (3) (ba) Ministers will be required to include a statement in the NPF about how these outcomes are achieved.

**Age Scotland believes this is a welcome move by the Scottish Government. However this does not attach the same priority which would be given by national targets.**

**2. Introduce national targets for older people’s housing.**

Section 1 of the Bill amends section 3A of the 1997 Act, which requires there to be a spatial plan for Scotland to be known as the National Planning Framework (NPF). Age Scotland believes that the NPF should include setting clear national targets for delivering older people’s housing, as well as identifying where future regional partnership working should occur, and where it would be most effective and would deliver the best outcomes.

New subsections 3A (3C) and (3D) of the 1997 Act provide that the Framework must contain national targets for the provision of housing suitable for older people and disabled people, including targets for the building of new housing to meet their needs, and such other matters as the Scottish Ministers consider necessary to meet the housing needs of these groups.

**Age Scotland welcomes the changes to the Bill so that the National Planning Framework (NPF) will now include clear national targets to address the housing needs of older people, including targets for the adaption of existing housing to meet the needs of older people, and targets for the building of new housing to meet their needs.** Age Scotland believes this approach will address the housing needs of older people. Setting clear targets for the provision of older people’s housing will help to ‘future proof’ provision, and help to ensure that Scotland is best equipped to meet the housing issues and challenges presented by its ageing population.

The case for national targets is further underlined by, for example, the increase in the housing needs of single older people. Age Scotland is aware that, as Scotland’s population ages, there will be a growing demand for accommodation to meet the specific needs of single older people. To put this in perspective, by 2039 there are projected to be 484,800 people aged 65 and over living alone, an increase of 45% from 333,400 in 2014.[[14]](#footnote-14)

Ensuring the NPF includes national targets to address the housing needs of older people will help to provide a focus for such action, and to influence the targets which we believe should be included in the local development plans.

**AMENDMENTS 24 & 25.**

These remove the introduction of national targets for housing suitable for older people and disabled people proposed by Kenneth Gibson MSP and agreed at stage 2. Age Scotland recognises that the Scottish Government has acted to meet our concerns with regard to the need to prioritise the housing needs of older and disabled people within the National Planning Framework. **However Age Scotland continues to believe that this can best be achieved by having national targets included within the National Planning Framework. Without such targets it will not be possible to measure the progress that is being made nationally in meeting the needs of an ageing population.**

**Age Scotland calls on MSPs to vote against these amendments.**

**3.Introduce a requirement for consultation with older people in developing the National Planning Framework (NPF)[[15]](#footnote-15)**

New subsections 3A (10A) to (10C) of the 1997 Act, inserted by subsection (5) of section 1 of the Bill, set out a list of persons who must be consulted in respect of the targets for the provision of housing suitable for older people and disabled people. In connection with that, subsection 3A (3c) (b) of the 1997 Act, inserted by section 1(2F) of the Bill, requires the Framework to contain a statement setting out the consultation undertaken in accordance with subsection (10A) and how the views of those consulted have been taken into account.

**AMENDMENT 32.** This removes the requirement to consult on national targets for housing suitable for older people and disabled people proposed by Kenneth Gibson MSP and agreed at Stage 2. **Age Scotland continues to believe that national targets and the need to consult on these, in order to draw upon robust evidence and best practice are necessary.**

**Age Scotland calls on MSPs to vote against this amendment.**

**4.Prioritise the housing needs of older people in local development plans.**

**Age Scotland called at Stage 2 for local development plans to include a detailed statement of the priority being given by the planning authority to address the housing needs of older people, and of the policies and proposals the planning authority is taking, and will take, to address the housing needs of older people.**

Age Scotland believes that the local development plans developed and introduced by planning authorities under Section 15 of the Town and Country Planning (Scotland) Act 1997 can potentially make a significant contribution to addressing the housing needs of older people. We, therefore, take the view that, when planning authorities are developing local development plans, they must properly consider the needs of older people. Age Scotland also strongly believes that the planning system must facilitate, rather than restrict, the provision of sufficient homes which meet the specific needs of older people. Age Scotland, therefore, believes that local development plans should identify suitable sites specifically for older people’s housing, including brownfield land, which are suitable for older people’s housing.

As Scotland’s population ages there will be a requirement for particular types of housing which meets the specific needs of older people, and are specially adapted for people living with dementia, people who have mobility issues, people with disabilities and people with a sensory impairment. This will require a proper mix of homes for rent, and to buy, and for different income levels.

In this respect, Age Scotland believes that a greater variety of new homes which are attractive to older people could be helpful in supporting the housing market, and in releasing larger family homes. We also take the view that there should be different models of housing to increase choice, and to support independent living for older people. This should include new and innovative models that enable older people to maintain their independence in the community, and to expand the provision of preventative support. This includes co-housing and initiatives which promote intergenerational living such as homeshare. In addition, there must be an adequate supply of sheltered housing, and of very sheltered housing.

Local planning policies must also anticipate the number of older people requiring housing within local communities, and plan to deliver housing appropriate to their needs. In this respect, there is a need to develop housing which is attractive, and well located for the needs of older people. Age Scotland agrees with the Scottish Government’s strategy for housing for older people that: “*For new housing to be attractive to older people, it needs to be built on level ground, with good landscaping or paving and lighting. Easy access to transport links and amenities is important, particularly in rural areas. This helps to reduce isolation, which is likely to occur if people are unable to go out and be active in their communities*.”[[16]](#footnote-16)

Part of the process of addressing the housing needs of older people will involve building resilient age-friendly communities. This will require planners to work with local communities to better plan public buildings, pavements, bus shelters, community spaces and amenities to suit older people’s needs. Prioritising the housing needs of older people in the National Planning Framework and in the Scottish Planning Policy, and in the local development plans, can make a major contribution to building such communities.

**AMENDMENT 83.**

**Local Development Plans – Evidence Report**

The Scottish Government has brought forward this amendment which introduces a requirement for the evidence report to set out “a summary of the action taken by the planning authority to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority’s area.” And “an analysis of the extent to which the action has helped to meet those needs.”

**Age Scotland strongly welcomes this amendment.**

**5. Require local development plans to identify land designated for older people’s housing.**

Age Scotland is calling for planning authorities to include details in local development plans of any land designated for the development of older people’s housing. Age Scotland believes this could make an important contribution to addressing the housing needs of older people by ensuring that planning authorities focus on older people’s housing needs when preparing local development plans.

We also strongly believes that the planning system must facilitate, rather than restrict, the provision of sufficient homes which meet the specific needs of older people. We, therefore, believe that planning authorities, when developing their local development plans must properly consider the housing needs of older people. Part of this process must be ensuring that the LDPs include details of any suitable sites specifically for older people’s housing, including any brownfield land which are suitable for older peoples’ housing.

**AMENDMENT 67**

**Local Development Plans – Form and Content**

The Scottish Government has brought forward this amendment which sets out the matters that must be taken into account in the policies and proposals as to the development and use of land in local development plans. Section 15 (5) (ca) sets out that this includes “the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people.”

**Age Scotland strongly welcomes this amendment.**

**6. Introduce a duty to provide information about the housing needs of older and disabled people’s housing[[17]](#footnote-17)**

**Information to inform the National Planning Framework**

For the purpose of assisting the Scottish Ministers in preparing or revising the National Planning Framework, the Scottish Ministers may direct a planning authority, or two or more planning authorities, to provide information about the matters set out in Section 3AA subsection (2). These matters now include at 2 (ce) the “housing needs of older people and disabled people within the area as proposed by Kenneth Gibson MSP and agreed at Stage 2.

**Age Scotland welcomes this change to the Bill.** Webelieve it will help to ensure that the National Planning Framework is informed by information and evidence from planning authorities about the housing needs of older and disabled people within local planning authorities’ areas

**7. Ensure Local Development Plans (LDPs) include targets to address the housing needs of older and disabled people.[[18]](#footnote-18)**

New subsections (1B), (1C) and (1D) of section 15, inserted by section 3(2) (ac) of the

Bill, require the local development plan to include targets for the provision of housing

for older people and disabled people, taking into account any national targets

contained in the National Planning Framework.

**AMENDMENT 60**

Amendment 60 removes the requirement for the local development plan to

include targets for the provision of housing for older people and disabled people

proposed by Kenneth Gibson MSP and agreed at Stage 2. **While Age Scotland**

**welcomes the moves the Scottish Government has taken to address the housing**

**needs of older and disabled people within local development plans we continue**

**to support local targets as the best way of ensuring that we satisfy the current**

**and future unmet needs of older and disabled people. We believe that local**

**targets will ensure that there is a focus for the action required to meet those**

**needs and that they will in turn, help to promote the co-ordinated and**

**collaborative approaches which will be necessary to meet those needs.**

**Age Scotland calls on MSPs to vote against this amendment.**

**8. Ensure that planning authorities consider the use of Dementia and Age friendly design when preparing their Local Development Plans (LDPs).[[19]](#footnote-19)**

New subsections (2C) to (2F) of section 15 require the local development plan to include information on the use of accessible design to meet the housing needs of disabled people, and age and dementia friendly design to meet the housing needs of older people.

**AMENDMENT 62**

This removes new subsections (2E) and (2F) which introduce the requirement for a local development plan to include a summary of the action taken by the planning authority to support and promote the use of age and dementia friendly design in the construction and adaptation of housing to meet the housing needs of older people. This was proposed by Pauline McNeill MSP and agreed at Stage 2.

**Age Scotland and The Health and Social Care Alliance Scotland (the ALLIANCE) calls on MSPs to vote against this amendment.**

Age Scotland supports the requirement for local planning authorities to: provide an estimate of the new housing for older people scheduled for construction which will use age and dementia friendly design in its construction and estimate the existing housing which will be adapted using age and dementia friendly design in each year of the local development plan.

Age and dementia friendly design is defined as design “which takes into account the needs, including the mental health and wellbeing needs of older people in the construction or adaptation of the housing.”[[20]](#footnote-20)

**9.Place a duty on Scottish Ministers to report to the Scottish Parliament “as soon as practicable” after two years.[[21]](#footnote-21)**

**AMENDMENT 53**

This removes new Section 1B of the Bill which introduces section 3CB into the 1997 Act. This new section sets out the need for Scottish Ministers to lay a report before the Scottish Parliament “as soon as practicable” after two years proposed by Alexander Stewart MSP and agreed at Stage 2. This report would be on the progress being made towards meeting the housing needs of older people. The report would include information on the extent to which the construction of new housing, adaptation of existing housing and other actions taken meet the housing needs of older people.

The Scottish Government appear to argue that this is “unduly costly and time consuming”. Age Scotland would refute this and would point out that the Scottish Government expects planning authorities to report back to them on an annual basis (Amendment 163)[[22]](#footnote-22)

**Age Scotland calls on MSPs to vote against this amendment.**

**Conclusion**

**Age Scotland believes** that, as the population ages and the proportion of people of retirement age increases, **there is a pressing requirement to ensure that the housing needs of older people, particularly older single people, are explicitly recognised within the planning system, and its processes.** Housing has a key role to play in allowing older people to live independent, healthy and active lives at home for as long as possible. Age Scotland also believes that investment in housing will save resources that would otherwise be spent on health and social care, will help to tackle loneliness and isolation and contribute to the greater health and wellbeing of Scotland’s older people.

**Age Scotland considers that identifying land for new house building suitable for older people and properly assessing the needs of older people in local authorities’ Housing Need and Demand Assessments, along with setting national targets, working collaboratively on a regional basis, and including specific targets in local development plans will all be necessary to satisfy the current and future unmet housing needs of older people.**

**17 June 2019**

1. https://www.parliament.scot/S5\_Bills/Planning%20(Scotland)%20Bill/SPBill23AS052018.pdf [↑](#footnote-ref-1)
2. https://www.gov.scot/publications/empowering-planning-to-deliver-great-places/ [↑](#footnote-ref-2)
3. Scottish Planning Policy, The Scottish Government June 2014. [↑](#footnote-ref-3)
4. Scotland’s Population, The Registrar General’s Annual Review of Demographic Trends 2014, p.18.

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Age Scotland is a registered charity (#SC010100), and company limited by guarantee (#153343), in Scotland at the above address. [↑](#footnote-ref-4)
5. Moved by Kenneth Gibson MSP. Adopted 12 September 2018. [↑](#footnote-ref-5)
6. Moved by Kenneth Gibson MSP. Adopted 12 September 2018. [↑](#footnote-ref-6)
7. Moved by Kenneth Gibson MSP. Adopted 12 September 2018. [↑](#footnote-ref-7)
8. Moved by Kenneth Gibson MSP. Adopted 19 September 2018. [↑](#footnote-ref-8)
9. Moved by Kenneth Gibson MSP. Adopted 19 September 2018. [↑](#footnote-ref-9)
10. Moved by Kenneth Gibson MSP. Adopted 12 September 2018. [↑](#footnote-ref-10)
11. Moved by Kenneth Gibson MSP. Adopted 19 September 2018. [↑](#footnote-ref-11)
12. Moved by Pauline McNeill MSP. Adopted 19 September 2018. [↑](#footnote-ref-12)
13. Moved by Alexander Stewart MSP. Adopted 19 September 2018. [↑](#footnote-ref-13)
14. Household Projections for Scotland 2014 based, National Records of Scotland, 31 January 2017. [↑](#footnote-ref-14)
15. [↑](#footnote-ref-15)
16. Age, Home and Community: A Strategy for Scotland’s Older People: 2012 – 20121. [↑](#footnote-ref-16)
17. Moved by Kenneth Gibson MSP. Adopted 12 September 2018. [↑](#footnote-ref-17)
18. Moved by Kenneth Gibson MSP. Adopted 19 September 2018. [↑](#footnote-ref-18)
19. Moved by Pauline McNeill MSP. Adopted 19 September 2018. [↑](#footnote-ref-19)
20. Planning (Scotland) Bill [AS AMENDED AT STAGE], SP Bill 23A, Session 5 (2018), page 13. [↑](#footnote-ref-20)
21. Moved by Alexander Stewart MSP. Adopted 19 September 2018. [↑](#footnote-ref-21)
22. Planning (Scotland) Bill, Marshalled List of Amendments selected for Stage 3, Amendment 163, page 40. [↑](#footnote-ref-22)