

Review of Policy7: Other special housing needs

1. Introduction

- 1.1 The purpose of this paper is to review the current Local Development Plan (LDP) policy approach to special housing needs and make recommendations in light of changes in national policy and the local context. In this case the policy under review is LDP Policy 7: Other special housing needs.

2. Policy Approach

- 2.1 The overarching aim of Policy 7 is to ensure that a range of housing types is provided within Aberdeenshire to meet the needs of all residents. The policy accepts that general housing policies may not meet the needs of all groups in society and allows the adequate provision of alternative housing types.
- 2.2 Policy 9 includes the following supplementary guidance which provides specific information on how the aims of Aberdeenshire Council in relation to the provision of a range of house types can be achieved:
- SG SHN1: Development for special needs;
 - SG SHN2: Residential Caravans;
 - SG SHN3: Gypsies/travellers

3. Background

National context

- 3.1 Scottish Planning Policy (SPP) (2010) provides the core national direction for guidance relating to planning. With regard to housing, SPP advises that local plans should address the housing needs of groups such as travelling showpeople, Gypsies and travellers and should consider the need for houses in multiple occupation (HMO).
- 3.2 While Gypsies and travellers generally need transitory sites for mobile homes and caravans, travelling showpeople require permanent sites for both accommodation and storage. SPP advises that the needs of these groups should be considered through the housing needs and demand assessment and the local housing strategy. In order to assess the need of these groups, local authorities must take into consideration not only the known groups in their area but also those groups who may arrive at a later date.
- 3.3 Historically the demand for HMO accommodation has come from students, however SPP highlights that there is now a growing demand from migrant workers and young professionals. Accordingly, planning authorities should consider the need for HMO accommodation as part of the housing supply. Circular 8/2009 Houses in Multiple Occupation provides detailed information on the provision and management of such accommodation. The Circular advises that high concentrations of HMO accommodation may produce a range of issues relating to the provision of services and infrastructure, increased house prices, erosion of community spirit due to the transient nature of some residents amongst others. Planning Authorities can initiate

policies which control the concentration of HMO accommodation while ensuring that an adequate supply is maintained.

- 3.4 National Planning Framework 2 (NPF2) places housing as being central to the aim of increasing the sustainable economic growth of the country. While the NPF2 does not specifically refer to the differing housing needs of all groups it aims “to improve the affordability, stability and fairness of Scotland’s housing system”. NPF2 advises that housing need should be identified through the housing strategy process.

Strategic/regional context

- 3.5 The Aberdeen City and Shire Structure Plan (2009) provides the direction for planning at the regional level. While the Structure Plan does not specifically refer to residential caravans and HMO accommodation, it highlights that new development must benefit the whole community, including the needs of Gypsies and travellers.
- 3.6 The proposed Aberdeen City and Shire Strategic Development Plan continues to support the aim that all development must meet the needs of the whole community, including, specifically, Gypsies and travellers.
- 3.7 The Aberdeenshire Local Housing Strategy 2012-2017 (ALHS) advises that “all individuals have the right to expect the same quality of housing regardless of their ethnicity” and aims to achieve this by supporting the provision of housing for Gypsies and travellers. The ALHS also promotes housing for people with particular identified need.
- 3.8 SPP advises that Local Development Plans and Local Housing Strategies should be informed by housing need and demand assessments which will provide evidence of the demand for housing so that land allocated for housing through the development plan process is adequate. The Aberdeen City and Shire Housing Need and Demand Assessment (updated 2011) (HNDA) identifies the volume of housing required to meet housing demand and need.
- 3.9 While the HNDA confirms the need for sites to serve the Gypsy/traveller communities it is not considered that there is a housing requirement for travelling show people. The HNDA advises that travelling showpeople regularly use sites historically agreed by Aberdeenshire Council during the summer months to hold fun fairs and circus activities and do not require winter accommodation. The HNDA does not refer to residential caravan accommodation.

4. Drivers of change

- 4.1 Policy 7 aims to ensure that a range of housing types is provided within Aberdeenshire to meet the needs of all residents. In both a national and regional context the policy remains valid. The most up to date guidance available continues to support temporary sites for Gypsy/travellers and travelling showpeople as well as highlighting the likely need for additional houses for people with specific needs as a result of the increase in the elderly population.
- 4.2 One housing type specified as part of the policy is Houses in Multiple Occupation (HMO). While the HNDA highlights a report from the University of

the Highlands and Islands which states that migrant workers have no specific housing needs compared to the general population, the study was issued in 2006/7, at least six years ago. The HNDA provides more up to date figures which suggest that 1500 migrant workers move to Aberdeenshire each year while the number of licensed HMOs has increased from 34 to 148 from 2005 to 2010, an increase of 435%. Anecdotal evidence from council officers advises that the level is increasing due to the influx of migrant workers. It is assumed that these figures refer to seasonal workers or professional workers who have moved into the area to work in the oil industry.

5. Recommendations

- 5.1 While the policy itself remains robust there may have been a case to include HMO accommodation as part of the policy. SPP advises that HMO accommodation should be considered as part of housing policy while Circular 8/2009 advises that planning authorities should ensure that an adequate supply of HMO accommodation is available and should introduce policies if the concentration of HMOs is seen to be an issue. However, in spite of an apparent increase in HMO licences being issued, the fact remains that in many cases, unless a material change of use has occurred, planning permission is not required. None of the six planning teams in Aberdeenshire have experienced a significant level of planning applications for HMO accommodation. While there appears to have been concerns over a couple of applications in Fraserburgh and Peterhead in the last few years it is not considered to be significant enough to warrant a new policy. Accordingly it is not considered that there is any real requirement at present to justify the creation of new supplementary guidance to deal with HMO accommodation. Should a planning application be submitted for the creation of a HMO, it is considered that it could be satisfactorily assessed against SG: LSD2: The Layout, Siting and Design of New Development and SG: LSD 4: Infill Development. Should issues over the density of HMO accommodation increase in the future there will be an opportunity to amend the policy in subsequent reviews.

6. Summary of main points

- 6.1 The policy remains robust and continues to provide a framework to ensure that all residents of Aberdeenshire can access a suitable range of housing types. While the demand for HMO accommodation has been increasing, not all HMO's need planning permission. Local Authorities must not only establish the need for all types of residential accommodation but can also introduce policies to limit over concentration of HMO accommodation in any specific area. The level of applications for this type of development does not warrant any amendment of the policy.

References

Aberdeen City and Shire Strategic Development Plan Authority (2009) *Aberdeen City and Shire Structure Plan*
Aberdeen City and Shire Strategic Development Plan Authority (2013) *Proposed Aberdeen City and Shire Strategic Development Plan*
Aberdeen City and Shire (2011) *Housing Need and Demand Assessment*

Aberdeenshire Council (2012) *Aberdeenshire Local Development Plan 2012*
Aberdeenshire Council (2012) *Aberdeenshire Local Housing Strategy 2012-2017*
Scottish Government Circular 8/2009 *Houses in Multiple Occupation*
Scottish Government (2009) *National Planning Framework for Scotland 2*
Scottish Government (2010) *Scottish Planning Policy*