

In commenting on the proposed NPF4 - there are a number of key issues and points to be made:-

(A) DELAYING THE CONSULTATION FOR A MONTH IS INADEQUATE. From the cancellation of the Glasgow event - certain communities have been left disadvantaged. NPF4 should be delayed until these presentation and events can take place safely.

(B) LEARNING FROM NPF3: There is a need to learn from the fine words, but little used, NPF3. With the Minister seeking to BOTH set policy, AND be the final route of Appeal - the role of NPF4 will be more critical. The failings in the Planning Act (Scotland) 2019 - including 10 year timescale, extra burdens placed on Planning Departments, and loss of most SG, will inevitably place much more emphasis on the need for a succinct, and hopefully useful, NPF4.

(C) URGENT DEED FOR SCOTLAND TO BUILD TO A MINIMUM DENSITY (of say 30 dpha - as used to apply in England). All the SGov focus is on the number of new houses being built - but not on quality or density. Indeed the data on "housing completions" is also flawed - as SGov, Home Reports, and solicitors assisting a new purchase - all ignore the huge and growing number of "non-adopted" new houses.

Most private housing is built at between 14 dpha and 21 dpha - using classic road layouts that utilise 30% of the land (see CABE research). Yet the Designing Streets approach (which reduces hard tarmac areas from 30% to ~21%) seldom happens. With so much new housing being built on greenfield or greenbelt land - it is critical that NPF4 demonstrates a respect for Scottish Land - and **applies a minimum density (30 dpha) requirement**. A Scottish Government that fails to apply a density policy is - in practice - indicating it does not value Scotland's land and countryside.

(D) NEED TO FOCUS ON PROMOTING HOUSING QUALITY - NOT JUST HOUSING NUMBERS: The UK has some of the smallest houses in Europe. Most new housing in Scotland is poorly designed, lacks character, and is too small. Increasingly there is limited external garden area (as current lockdown emphasises the value of open space!). Thus some Council's have introduced local HOUSING STANDARDS (Glasgow, Fife) leading to the strange situation where social housing is being built to better standards than private housing. Volume House Builders also face varying standards across different LA areas.

Thus a key focus for NPF4 over 2020 should be to promote a succinct "**SCOTTISH HOUSING STANDARD**" - ideally based on Glasgow, Fife and other standards such as Parker Morris. Even Homes for Scotland has welcomed such a Standard. This would also allow low energy requirements, lower waste objectives, and ensure ALL new houses are accessible (no steps; wide doorways, etc). Indeed there is a good case for requiring all new housing schemes of over, say 10 dwellings, to require a named architect to oversee the design of the estate. All too often (for example) standard house types fail to take account of the site orientation.

(E) HOUSING NEED - BY TYPE? At present housing need is largely determined from Council's Housing Waiting Lists. But this need is for Social Housing (Council or Housing Association) (with too low Self Build & Housing Co-operative alternatives) - informing HIP bids. Yet this social housing need is then turned into a private house building target that often seeks to bypass allocated development sites. At present Councils start off by trying to plan growth alongside infrastructure development (transport, roads, schools, shops; POS; etc). But all too often land owners or farmers obtain planning approval (thinking they've become millionaires) - but nothing then happens. Typically the upfront infrastructure costs lead to the approved development not happening. And then - to a shortage of new build numbers - and unplanned development on green fields and in Green Belt. **NPF4 and any emerging Land Value Capture system need to urgently address such sites** - which have had planning approval - but where nothing is happening (usually due to the level of up-front infrastructure costs). Indeed NPF4 could greatly assist by setting out typical infrastructure costs or s.75 contributions required from development. The reduction from some £15k /house to some £5k /house s.75 contributions over the past 10

years is leaving far too many new housing estates without the required infrastructure. From drains being overloaded to portacabin school-rooms!. NPF4 needs to ensure appropriate infrastructure contributions.

Indeed ideally the zero VAT would only apply to LDP allocated or brown-field sites - with full VAT payable on green field or greenbelt sites - allowing lower VAT to be applied to building/ tenement repair and restoration.

(F) EMBEDDING TRANSPARENCY IN THE PLANNING SYSTEM: NPF4 needs to succinctly promote best practice on transparency and community engagement (eg right to address the Planning Committee). With transparency decreasing in some Council's - this is all the more urgent to try and maintain a trust in the planning system. The growing number of inaccurate Planning Application forms and Certificates of Ownership do not help. All documents and meeting notes are scanned in on receipt - yet only some 55% to 65% are made "PUBLIC". This is simply not good enough - wasting everyone's time on FoI requests.

The above are 6 key points that NPF4 urgently needs to address. Other Community Council's (and Planning Democracy) have commented on the proposals in more detail. Planning in Scotland - with the many local worries and concerns ignored by the 2019 Act - is increasingly at a crossroads. It remains questionable whether a succinct NPF4 can actually improve the quality of Planning in Scotland, and move it in the right direction.

SUBMISSION TO NPF4 CONSULTATION
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