

JP/LDP/National

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Sent by Email

scotplan@gov.scot

CHIEF EXECUTIVE
Margo Williamson

Dear Sir/Madam

Response to National Planning Framework 4 Housing Technical Paper

This response to the National Planning Framework – Housing Technical Discussion Paper has been prepared following collaboration between Angus Council's Planning Service and Housing Service.

General Comments on Overall National Planning Framework Approach

Angus Council is supportive of the guiding principle that the approach to setting national housing land figures can provide early clarity and to reduce conflict and complexity in the local development plan process. This approach will enable planning authorities to focus on local outcomes and the delivery of an adequate supply of housing land.

National Planning Framework – General Comments on the Proposed HNDA Process & Relationship with LHS

The land targets arising from Scottish Government running steps 1 and 2 of the HNDA tool for each local authority area must be in the context of the proposed national strategy taking account of wider objectives of addressing climate change, making the best use of land as a resource, and maximising existing infrastructure investment. The ambitions of Housing to 2040 and the potential shift in models of housing provision and delivery, and potential funding mechanisms are all relevant to this exercise. 'Homes' also need to be recognised as an interconnected part of a 'local system' of place, affordability, quality of life, and health and wellbeing.

Clearly the economic, environmental, social and geographic impacts of the coronavirus will have implications for delivery of homes in Scotland for at least the short to medium term, but most likely into the long term when taking account of the impact on local businesses, supply chain, available finance, availability of workforce etc. These impacts should be factored in to the methodology where possible.

The amount of land required to deliver an appropriate supply of the right type of housing in an area is inseparable from, and fundamentally related to, the detailed nature of housing need and demand in that area, and the variety of different ways

in which that can be met, including adaptation of existing stock, regeneration sites, urban infill and new greenfield land. The characteristics of the local area will also determine the appropriate type, scale and density of development and the amount of land needed to accommodate that.

National Planning Framework - Future Timescales & Scope for Local and Planning Authorities Working Together to Reflect Functional Housing Market Areas

The current Angus Council HNDA was prepared in 2013 in preparation of the TAYplan Strategic Development Plan. Angus Council in partnership with Dundee City Council and Perth & Kinross Council have recently met to discuss and agree that a co-joined HNDA should be prepared for the three Council areas. The three Councils will also be working together on the new Regional Spatial Strategy.

In areas where functional housing markets cross local authority boundaries, such as Angus, and the submission of alternative assumptions and scenarios would be necessary, the proposed mechanism and timescale for input to the preparation of the NPF may not be achievable. Whilst a full HNDA would provide the necessary evidential base, there would be prohibitive additional resource implications to undertake this work outwith the HNDA process. This would particularly be an issue where the existing HNDA and LHS timescales do not relate well to the proposed NPF timeline.

It wouldn't be acceptable to require authorities in these circumstances to await the LDP Gatecheck process to determine the robustness of their land requirement only because the simple Step 1 and 2 process run as part of the preparation of the NPF does not go far enough.

In relation to the preparation of the first NPF to use this methodology we would welcome specific consideration to be given to the opportunity to submit local area alternatives at any time including between the draft and revised draft NPF. Clarity on timescales, input required, and type of evidence regarded as robust would be required. Opportunity to more closely align future NPF, HNDA, LHS and LDP should be reviewed.

The HNDA Tool as an Appropriate Mechanism on which to Base Housing Land Figures

We consider it important with step 4 of the HNDA process, in relation to 'flexibility', that housing land completions based on local authority housing land audits are also used to establish the minimum housing land figure.

It is important to consider that for 'flexibility' to be informed by recent completions, the average completions over a particular period will reflect prevailing market conditions, the development plan strategy in force at that time, and the availability or otherwise of an effective 5 year land supply (under current provisions). The implications of whether completions have come from allocated or windfall sites should also be considered, and the share indicated.

It would be useful to distinguish those planning permissions which seek to establish a valuation from those intended to be built out.

Without the use of additional data sources, such as completions, the HNDA tool results will only produce outputs based on population and HoToC outputs (homeless, temporary, overcrowded, & concealed needs) which isn't necessarily enough detail to accurately reflect local circumstances or market conditions.

Whilst we would be happy for Scottish Government to run the first steps, steps 1 and 2 of the HNDA tool using default scenario and assumptions, the additional considerations we have discussed above should also be factored in to the overall HNDA process.

Use of the HNDA Tool to Inform Future Affordable Housing Funding

In addition to the Scottish Government running steps 1 and 2 of the HNDA tool and the output of this being the housing supply target for the local authority area, we feel further clarification is required on how this will or won't be used to inform future funding for affordable housing?

If there is going to be a comparable figure for housing need and demand across different local authorities it would seem logical that this informs future funding for affordable housing to some extent.

National Planning Framework - Housing Land Requirements as a Minimum Requirement

Angus Council agrees that the NPF housing land figures should be regarded as a minimum requirement.

This approach would continue the approach set out in the current Scottish Planning Policy which sets out at paragraph 116 that plans should indicate the number of new homes to be built over the plan period, and that this should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided.

The issue of how to provide additional flexibility will clearly vary across Scotland, for example small housing sites, with a capacity of less than 5 housing units are regarded as providing additional flexibility in the housing land supply in Angus and do not count towards meeting the Housing Land Requirement. These types of sites make up a significant amount of the annual housing land completions and make a big contribution to the delivery of new homes across the area. A significant proportion of these sites lie in the rural area, outwith the main settlements. It is important that LDPs in rural areas and/or areas where market demand for housing is not as strong as other areas can continue to build in this type of flexibility to supplement the supply of housing either as part of the requirement or additional flexibility. Similarly the contribution of previously developed sites needs considered in this context.

Future Mechanism to Ensure Land is Brought Forward in Accordance with LDP Spatial Strategies

With regards to the mechanisms that could be used to ensure land is brought forward in accordance with the LDPs spatial strategy, there is potential for much

closer alignment between the housing land audit process and delivery programmes to help confirm site effectiveness and programme investments.

Recognising the specific circumstances that exist in some parts of Scotland where there is a low level of market demand for housing, and where the spatial strategy seeks to deliver on wider objectives such as climate change, productive use of land there may be a need for a mechanism of support to assist or incentivise the reuse of previously developed sites, adaptation of existing buildings and the protection of agricultural land as a resource. Without direct interventions and financial support the aim of securing **delivery** of new housing units might favour greenfield land allocations in preference to more sustainable development strategies. Previously developed sites in low demand areas have often been vacant for 3 or more Development Plan cycles and significantly impact on the value and community aspirations for a Place.

The work of the Scottish Land Commission exploring the transformation the approach to bringing vacant and derelict land back into productive use and the workstream looking at the role of reform reducing land constraints to placemaking and restrictions to the supply of land of housing may have value in consideration of this issue but this needs to extend to smaller sites and rural areas.

Currently the housing land audit focuses on detailed programming for a five year period. Accurately programming sites over a longer 10-year period, particularly in lower market demand areas, such as Angus, will be challenging, confirmed by the Housing Land Audit Research Paper produced by Scottish Government in 2019. A standard approach to deal with this may therefore not be appropriate across the country.

Within a 10 year plan period, the programming should look at a figure for '5 years' and 'later years', with potential to provide annual programming for the first 5 years. The audit should be more directly linked with the delivery programme and collect completions figures on an ongoing basis as a function of monitoring. There may then be scope to publish an audit every 2 years (or annually if changing that might impact on Scottish Government data collection or funding decisions).

Whilst the approach has been supported by Additional work could still be further developed to continue to improve the housing land audit outputs, including a focus on what it may take to deliver some sites.

Housing Land Audit Process – A Future Role for Scottish Government

In order to ensure consistency and compatibility in assumptions and methodology for data collection across Scottish local authorities the Scottish Government should be involved. Particularly important is the monitoring role of the housing land audit and the input that data might make to the review of the role of the NPF in setting land targets in Scotland and how that is rolled forward into future NPFs. This does however need to link to accurate data and there is an opportunity to better link up delivery information and avoid a reliance on NB2 returns which more often than not don't reflect the position.

We would be happy to clarify any of the points made in this response.

Yours faithfully



Jill Paterson
Manager – Strategic Planning