
Response to NPF4 Housing Technical Discussion Paper

1. The Partnership has been established since 2008, under the Scottish Government guidance developed to support joint working on matters impacting on planning for housing and fulfil two core functions: to produce a HNDA as a core evidence base for Local Housing Strategies and Development Plans (Housing (Scotland) Act 2001; and to support preparation of a regional spatial strategy. Though the Planning (Scotland) Act 2019 has repealed SDPs there remains a core statutory function for local housing and planning authorities to produce HNDA. Through the GCR Partnership, work is underway to produce a third HNDA that continues to develop our understanding of and approach to housing issues impacting on the functional market areas within the Glasgow City Region, and which will form the statutory evidence base in support of future LHS and LDPs.
2. Individual authorities of this Partnership will be responding to the consultation but the Partnership we would like to offer the following summary comments which focus on the policy context for planning for the housing numbers rather than any Technical aspects of the operation of the HNDA Tool.

a) The GCR HMP is a key stakeholder which should be represented on the housing advisory panel mentioned within the Discussion Paper.

The Partnership would like to thank the Government for the opportunity to comment on this Discussion Paper and as the largest Housing Market Partnership in Scotland would like to further support the development of the policy and guidance context for planning for housing through representation, by both planning and housing, on the housing advisory panel mentioned within the paper.

b) A significantly more joined up national and local government approach to planning for housing is encouraged and supported.

The NPF4 Housing Technical Discussion Paper focuses on matters related to the housing “numbers” largely for development planning purposes, and does not pay sufficient regard to the connections between this planning role and the role of HMPs in understanding and addressing wider issues impacting on housing systems. The separation of Stages 1 and 2 of the Tool, from the wider systems analysis required through a full HNDA, may risk resulting in a diminished understanding of and response to interconnected housing issues. It is unclear how this consultation sits with the recent Housing to 2040 consultation and significantly more joining up within the national and local government approach to housing is encouraged and supported. In this regard the views of ALACHO will be important.

c) The proposal as set out for discussion purposes may not help simplify, centralise or reduce resources.

The potential to seek agreement on housing numbers earlier in the process within NPF4 is supported, however further detail and clarity, including in relation to the timing and alignment of Local Development Plans and Local Housing Strategies, will require to be brought to secure this outcome effectively. If the required timing

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and alignment cannot be achieved, these matters are likely to be opened up for debate at the “Gate check” and Examination stages and this could lead to legal challenges which would not assist in speeding up Development Plans.

Although inclusion of numbers within the NPF4, may help reduce downstream debate, it is unclear what significantly will be gained by the Scottish Government running Stages 1 and 2 of the Tool as that part of the process requires little resource. In fact what is proposed in this regard, would not require use of the HNDA Tool unless the results are to be tenured. The significantly more time consuming stages relate to HNDA preparation and debates over the policy interpretation of Housing Estimates to develop Housing Supply Targets. This aspect of the process will require to be factored into the timeline for agreeing housing numbers.

Any new process will require to pay careful attention as to how the differing time horizons of related plan and strategies, (30 year time horizon of the NPF, 10 year horizon of the LDPs, 5 year horizon of LHS), will work together.

- d) **The local authorities, including where they work in Partnerships, are best placed to take an informed view of planning for housing in their local areas and this Partnership will wish to continue to have a key role in that regard.**

Whilst the comments within the Discussion Paper regarding the importance of local input are noted, the proposals are being interpreted by many local authorities as a centralisation of an activity over which the authorities would wish to retain direct influence. If the Scottish Government is seeking to centralise this process then that may help provide the clarity and simplicity that the Planning Review sought whilst freeing up time for practitioners to focus on place making and delivery. However, there is a danger that what is proposed is neither a centralisation nor the status quo (which currently leaves these matters to local authorities), but a mixture of the two which if left unclear is likely to remain subject to the ongoing debate that plagues current arrangements.

- e) **National Targets and regulation can be highly effective in the sphere of housing delivery, particularly when accompanied by funding.**

Specifically, More Homes Scotland policy initiative provided a statement of national ambition and funding that has enabled local authorities and RSLs to scale up public sector delivery. However amongst the scheme’s shortcomings, the short time period and inability to plan beyond 2021 has contributed to inflating costs and creating a cliff-edge for delivery. There is some evidence that it helped promote more sustainable development with some LAs pressing for higher standards. However in some respects it has been a missed opportunity to engender a step change/transformation in how we deliver homes. What is needed is certainty of funding and resources over a longer period to provide a stable delivery pipeline and consistent standards. This approach would provide the ability to set deliverable targets over which the public sector has direct influence and control, and which could usefully be included in NPF4.

National Targets could also be set for other national policy issues including:

- i. affordable housing (the current Target being 25%);

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- ii. housing for older people and wheelchair users;
- iii. Gypsy Travellers where National Targets could usefully be set based on a national view of need;
- iv. the energy efficiency rating of both new, and existing stock.

Prescriptive minimum targets combined with building standards could have a major impact particularly in respect of the sustainability and accessibility of both public and private homes.

The influence of the planning system on private sector delivery Targets is weaker and as stated within the Government's Background Information Note on Housing General, the causal link between planning policy and completion rates is not established. In respect of the current outbreak of Coronavirus and its impact on the economy and society, private sector delivery rates are likely to decline sharply, and no Targets, land availability or planning permissions will alter that.

f) Careful attention requires to be paid to language and terminology.

The word "figures" is used eighteen times throughout the report and a number of other terms such as terms "Requirements", "Housing Land Targets" and "Flexibility" are used without clarity. Careful attention will require to be paid to the language utilised. *Estimates, Requirements, Generosity* and *Targets* are some of the terms in current usage and practitioners have established a better understanding of how and when these terms are used. In general, a reduction in terminology combined with careful attention to the terms are utilised, is supported to add clarity and remove confusion.

g) There are circumstances where Minimum Figures are inappropriate.

Minimum Figures for housing are likely to be inappropriate in areas of high market and commercial demand where some planning restraint is required.

h) The role of HfS.

This Partnership has developed a productive working relationship with Homes for Scotland who continue to be involved in Partnership activities. However the Partnership would have concerns if as implied in the Paper, HfS are to be granted a potential veto role in agreeing the scenarios and assumptions and any potential approach to functional market areas.

Wider considerations are required around the role and influence of HfS in addressing changing agendas including the impacts of Climate Change and the aging population. The industry has in general, been slow to respond to the demands of these agendas, tending to remain with traditional construction methods and models. However the policy arena is rapidly shifting to zero-carbon, with requirements for advanced offsite manufacturing, alternative materials, and different skill sets and the response of the industry and its representative body, will be critical in this regard.

Concluding Comments

3. A significant rationale of the Planning review was to free up resource within planning services and local authorities, to focus on enabling delivery activities. The Partnership is keen to support that outcome but has concerns that what is currently proposed, will

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not provide the clarity and certainty required. The Partnership wishes the Scottish Government well in this endeavour and is keen to help the Scottish Government shape this proposal into a workable solution and would be happy to work collaboratively with other stakeholders on the proposed housing advisory panel.