

30 April 2020

The Scottish Government
Planning and Architecture Division
Victoria Quay
Edinburgh
EH6 6QQ

By Email only to: scotplan@gov.scot

Dear Sirs,

National Planning Framework 4 Call for Ideas

This letter provides a response on behalf of Gladman Scotland in respect of the five questions posed as part of the National Planning Framework (NPF) 4 Call for Ideas.

1) What development will we need to address climate change?

NPF4 should facilitate 'climate ready' investment delivering social, environmental or economic benefits. In addressing climate change, national targets surrounding net zero emissions by 2045 need to be considered. A diversity of opportunities are required to provide flexible jobs, places to live and transport options.

Research by Ironside Farrar on the adoption and continued function of Scottish Planning Policy (SPP) recommends that the presumption in favour of sustainable development remains at the forefront of the plan making process and that policy wording should ensure sufficient weight is given to the development management process. NPF4 requires to reinforce this.

2) How can future planning best support our quality of life, health and wellbeing in the future?

In considering where and how people may choose to live in 2050, it is important to consider how many and what types of homes are required, how best to encourage re-population of Scotland's rural areas, how best to address inequalities in health and quality of life, how best to deliver the required new settlements, and how we can ensure place can be more resilient and inclusive. The improved delivery of new energy-efficient, accessible and flexible homes can contribute greatly to reducing inequalities in, and improving the overall experience of, quality of life.

The provision of new houses into an area can improve the affordability of property, and assist with more young people being able to more effectively access the property market. A major issue which needs to be considered is the critical shortage of available affordable housing, and the subsequent social and economic repercussions. In areas with more affordable housing, individuals and families are better able to divert funds away from acquiring/maintain a place to live, and are able to focus more attention and resources upon health and wellbeing.

The planning system should continue to promote active travel within settlements. In particular, it is vital that walking, cycling and public transport options are prioritised in urban areas. This aligns with the need to reduce car dependency. To achieve this, public transport options need to be better connected, and new homes should ideally be nearby to a variety of travel options.

To support this, there needs to be a national green belt review to understand which areas are capable of accommodating growth.

One of the biggest issues facing Scotland moving forward will be the increasing aging population. More smaller homes are required, to enable older people living in larger homes to downsize within the community they live in. Also, more single-storey and assisted-living homes are required to be built. There should be a policy mechanism for their delivery, as there currently is with affordable housing. More generally, it is vital that there is an improvement in policy so that the housing needs of older and disabled people are better accounted for in the planning system.

Recognition should be given to the role that new settlements represent as a sustainable and necessary mechanism to increase the stock of housing that is required, aligning this with an interconnected public transport system and the provision of accessible services and facilities.

3) What does planning need to do to enable development & investment in our economy to benefit everyone?

In seeking to establish what the economy may look like in 2050, we need to build resiliency into the system, and enable the planning system to stimulate and distribute investment and growth.

It is vital that the role that the house building industry contributes to the economy is recognised and facilitated through the planning system in a positive manner at all levels.

Local Development Plans, Regional Spatial Strategies and all other local, regional and national policy needs to be far more adaptable. Incoming ten-year Local Development Plans, require to be sufficiently agile in order to adapt to changing situations.

4) How can planning improve, protect and strengthen the special character of places?

In considering what places may need protection and improvement in the future, we need to: establish how we can unlock the potential of vacant and derelict land, rethink the concept of green belt land, ensure maximum efficiency in land use, consider how best to plan proactively for the incorporation of green and blue infrastructure, and twin the need to protect biodiversity and heritage assets with the requirement to more effectively deliver the necessary infrastructure and development to support the changing circumstances.

An essential aspect of any long-term planning requires the reassessment of the green belt as a mechanism for restricting development. The green belt should not continue to be utilised as a de facto landscape designation. If a particular place or area is required to be protected for specific reasons, the use of a specific landscape designation is more appropriate.

5) What infrastructure do we need to plan and build to realise our long-term aspirations?

We need to consider how we can make better use of existing infrastructure capacity, where transport connections will be needed in the future, how digital connectivity could change the way we live and work, and what emerging and future technologies we may need to plan for.

There are generally two key types of changes which need to be made: institutional change and specific infrastructure delivery.

It is vital to address immediately the limited institutional capacity to provide the necessary political, professional and technical leadership required to address the key issues being discussed within this consultation.

For example, a single methodology for calculating the housing land supply must be established. The lack of a methodology to calculate housing land supplies represents an area of woeful inaction on behalf of the Scottish Government, and is widely viewed and undermining placemaking objectives, often dominating the debate regarding new developments instead of focusing on the design and liveability of well-designed places.

Aligned with this, the terms, "effective" and "generous" need to be better defined in establishing the housing land supply. The PAN 2/2010 test must be updated, and aligned to a better model for determining when a site becomes "effective".

For example, Westminster has recently introduced policy which tests the housing delivery success of English planning authorities using a tool called the Housing Delivery Test. Unlike in Scotland, where authorities are solely judged on land identified on paper for housing delivery, authorities in England are expected to demonstrate they are delivering enough new homes through the planning system in a far more robust manner, and the standard of what constitutes an "effective" site is significantly more onerous.

As a result of this new test, the latest statistics show that a third of English authorities are failing to deliver against their need-based housing targets. The Scottish Government have the opportunity to consider that planning here should also consider the number of new homes delivered (against evidenced targets) as a key outcome-based measure of planning performance.

Considering PAN 2/2010, paragraph 55 is not fit for purpose as the current method for assessing the effectiveness of a site, as there is no clear indication that a site must be evidenced to be deliverable in the same manner as the new revised NPPF.

The new revised NPPF (published February 2019) includes a definition of "deliverable", which states that to be considered deliverable,

"sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a

grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. The definition is now worded so that the only sites for which there is a presumption of inclusion in the five year supply are small sites and sites with detailed planning permission. For all others, including even sites with outline planning permission, the wording in the revised NPPF presumes against their inclusion unless “there is clear evidence that housing completions will begin on site within five years”.

This new definition can be viewed as a recognition by the Government that, just because a site has outline planning permission or is identified in a development plan, it can still take a considerable time for such sites to deliver new homes.

The onus should be placed on authorities to provide clear evidence that such sites will deliver housing in the five-year period.

Another issue with PAN 2/2010 is the inconsistency this Notice engenders in Housing Land Audits. All HLAs going forward *must* include information regarding how long each individual site has been in the audit. Doing so would simplify and make more transparent the process of identifying potentially ineffective sites which current account to established housing land supplies. A standardised approach to preparing, consulting on and presenting HLAs should be introduced in Scotland to encourage consistency, transparency and accuracy in the calculation of housing land supplies. The standardisation of information presented through HLAs would allow for better analysis of future audits and would also enable a more accurate national housing land supply to be calculated, thereby allowing for better assessment of national supply vs housing land requirement models.

More generally, there also need to be a far greater emphasis placed upon supporting sustainable development through NPF4.

In summary, we support the use of NPF4 to reinforce the key themes of SPP, and the presumption in favour of sustainable development. Unequivocal guidance is required on key policy matters as outlined above, through national policy in order to filter down to all levels of implementation in achieving the desired outcomes for the country moving forward.

We look forward to engaging further in the development of the framework.

Yours sincerely,



for

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