

Planning for Scotland in 2050

National Planning Framework 4

National Planning Framework 4 Early Engagement – Policies

ENABLING DELIVERY OF NEW HOMES (ALL)

[Response by Jackton & Thorntonhall Community Council](#)

We have responded below to most of the questions posed in the discussion paper. There are some additional points arising from the research and consultation reported in the paper that we wish to add.

1. We strongly agree that there is confusion about how to calculate the 5 year housing land supply. The vagueness of the present definitions and guidance allow developers and others to challenge LDP calculations, often with success. Tighter definitions would remove this needless waste of effort.
2. We strongly agree that the terms “effective” and “generous” (if retained) need to be much more precisely defined in order to reduce ambiguity and legal exploitation of this ambiguity.
3. We agree that the range of housing being provided under the present system may not be well adapted to specific needs.
4. We strongly support the calls for greater emphasis on sustainable development and agree that current volume housebuilding layouts do not include sufficient (if any) community facilities or social infrastructure such as churches, community halls and recreation facilities that help to bind and define longer established communities.
5. The 25% provision of affordable housing, whilst well meant, is having the consequence (unintended we think) of encouraging developers to build fewer and more expensive houses than they might otherwise do. This is because the cost to the developer of providing one affordable house does not vary whether their development is of large, high value, low density houses or whether it is of modestly priced and sized starter homes. So, other things being equal, the developer will maximise their profits by building the most expensive houses they think they can sell. This problem could be alleviated by imposing an “affordable housing levy” on new house selling prices with the rate of levy being low on starter homes and rising and rising sharply on “luxury” developments. This would replace the current system and give planning authorities greater influence over where affordable housing units were placed.

Issues to consider:

Overall policy considerations

Do We need to revisit the overall aim and objectives of our housing policy?

The proposed key objective of NPF4 as stated relies heavily on the word “right” which will mean different things to different readers. We propose a more precise alternative: “To ensure that development plans assess, prove and deliver the most efficient and sustainable use of land to meet established needs.”

Should policies continue to focus on delivering homes and the quantum of land available or are there a wider range of objectives and approaches that should be built into policy?

Policies presently focus entirely on delivering homes and leave the land requirement to be determined by the development industry with planning authorities being left with the passive role of approving developments on their merits. This system offers no real control over how efficiently land is used or whether development proposals brought forward address the types of different housing needs in the area.

The HNDA output should be made more granular by indicating the quantum of need for student accommodation, starter homes, homes adapted for disabled occupants, homes suitable for elderly occupants and other categories identified as being required.

This more granular output would then allow a genuine housing land requirement to be generated by applying appropriate model densities to the differing types of requirement. In this way, the housing land requirement would become literally just that – a land requirement.

It would remain the role of the planning authority to identify appropriate sites to meet this centrally computed land requirement.

To support this approach, planning authorities must be given the power to be more specific in how housing land is zoned for the different types of housing needs so that a site earmarked for, say, a retirement village cannot be brought forward by a developer for planning approval for some other, unrelated purpose..

How can policies better reflect quality, distribution, type and delivery of homes and the role of housing in placemaking, and, in particular, the role of new housing in supporting climate change objectives?

The suggestions made in response to the first part of this question would go some way to making land use more efficient which would be positive for climate change objectives. A much greater focus on sustainable developments that use existing infrastructure and re-use previously developed but abandoned (brownfield) land would be the most positive contribution that NPF4 could make. The different social conditions, economic conditions and topography of each local authority make a prescriptive approach difficult. A stated presumption in favour of sustainable development and against green field development would, however, send a clear message.

How can a balance be struck between a plan-led approach and allowing authorities to respond to changing circumstances and local contexts?

Planning authorities already have discretion to depart from plans where they can justify doing so for sound reasons. Such discretion will become even more necessary given the new ten-year cycle of development plans.

What should be decided at different scales and stages? What should NPF do and what is the role of the local development plan? What should be set out in the evidence report and agreed at the gatecheck for local development plans?

The LDP should be based on and consistent with Local Place Plans where they exist and the gatecheck should ensure that it does.

Should the 5 year effective land supply continue to be a means by which the effectiveness of plans is measured?

A rolling five year supply target is sufficiently long to avoid short term volatility caused by the impact of economic conditions. We would not advocate a longer period because forecasting accuracy is likely to drop off very sharply. The present definition of effectiveness, however, needs to be clarified and tightened (see below).

What method should be used to calculate the land supply?

The land supply should include all land that could potentially be developed for housing, including land that is not currently free of development constraints but where there is a reasonable expectation that those constraints could (not will) fall away within the plan period. Sites that are considered to be unlikely to be developed should be removed as soon as this becomes clear.

Should the definition of 'effectiveness' be reconsidered?

Yes, "effective" land should include all sites that are free of development constraints or are expected to become free of development constraints within the rolling five year period. These sites should be included in their entirety even if the planning authority does not expect them to be developed either fully or in part within the relevant time period because they have the potential to be developed if demand exceeds the housing land requirement baked into the Plan.

How can we be clearer about what is being monitored to support an understanding of the dynamics of the housing land supply – homes delivered and / or land availability?

Our recommendation is that NPF4 sets the Housing Land Requirement as an area of land (hectares) in addition to numbers and types of homes so there needs to be a method of measuring all aspects. The relationship between area and number of homes will be determined by the types of homes required to be delivered. There is a need, therefore, to monitor output of homes by type as well as by tenure and, additionally, to ensure that appropriate densities are being achieved or exceeded.

How should progress be monitored and what action should be taken where it falls short of stated targets?

Current measures of housing completions appear to be unreliable and are insufficiently detailed to allow progress to be monitored with any degree of certainty. We are aware, as a result of recent LDP examinations, that in North Lanarkshire completions as measured through the Housing Land Audit (HLA) have consistently exceeded official statistics based on the issuance of completion certificates. In South Lanarkshire, however, completions measured by certificates issues consistently exceed completions measured through the HLA.

There is, therefore, a need for reliable statistics on housing starts and completions by type and, tenure and split by functional housing market (if adopted) as well as by authority. This type of information is probably best generated from housing land audits but must be reconciled to the issue of completion certificates to allow greater confidence to be placed on quarterly official figures. The table overleaf illustrates the type of output that should be generated in order to allow effective monitoring.

	Student		Disabled		Senior		Other Private		Social	
	Ha	Units	Ha	Units	Ha	Units	Ha	Units	Ha	Units
Opening HLR	1.0	30	1.5	50	5.0	100	20	500	6.5	200
Completions	0.3	10	0.4	12	2.0	30	7.0	150	1.2	30
HLR C/fwd	0.7	20	1.1	38	3.0	70	13.0	350	5.3	170
Achieved Density	33		30		15		21		25	
Target Density	30		33		20		25		31	

Can we use mapped and audit information to secure a stronger emphasis on monitoring?

Yes, by standardising Housing Land Audit data and methodology using a distributed database system using geolocation techniques it should be easily possible to improve the accuracy, timeliness and utility of the system for all users. Such a system should allow time-consuming annual on-site visits to be reduced or eliminated thereby freeing up resources for more productive tasks.

Such a system would assign a unique identifier for every housing unit included in a detailed planning consent and developers would be expected to provide status reports for each unit in, say, quarterly returns (not started/started, % complete/complete awaiting completion certificate/certified complete) so that very detailed monitoring information would be generated.

What role should housing land audits play in establishing the land supply as implementation of the plan progresses?

As suggested above, HLAs should be used as the primary means of monitoring both output and land use efficiency. In the early years of a plan period deviations from target output rates or land usage would be of little concern (unless extreme) but from year three onwards, the cumulative output and land usage should be expected to represent a reasonable measure of whether targets were being met or not.

Can delivery be incentivised so that there is a closer correlation between the build rate predictions and actual completions?

It is difficult to understand how this could be achieved or, indeed, whether it would be desirable to achieve it. Build rate predictions should be treated with considerable scepticism because they have a strong tendency to assume that the future will be like the recent past. In any event, there would be little point in incentivising build rates that differed substantially from target completions (as defined by the HLR). The current method of estimating build rates is not of any real value because all it is conveying is that developers expect demand to differ from the level

built in to the HLR – highly likely in the short term but improbable over periods of five years or more.

How can we strengthen links with local development plan delivery programmes and infrastructure capacity / improvement plans?

LDP's should be required to identify the infrastructure/capacity that would be needed to permit the delivery programme to be viable. The authority should, further, obtain the agreement of those third parties responsible for any of the required infrastructure improvement (e.g. network rail) that this can and will be delivered in time.

How should national planning policy approach the need to achieve more efficient use of land and infrastructure resources associated with the development of housing, e.g. maximising the use of urban/brownfield locations?

We suggest above that NPF4 and Scottish Planning Policy should state a presumption in favour of sustainable development and against green field development. That presumption should, over time, improve usage of urban/brownfield land where this is practical. Our other suggestions about improving land use efficiency would also help.

How can we achieve a more effective system which ensures that the right land is allocated and then developed and that where this is not achieved, that action is taken.

We do not accept that action need be taken in all cases where allocated land is not developed. In most cases failure to develop will arise from lack of sufficient demand to make the development profitable enough to be attractive.

Attempting to force developers to build ahead of demand (speculatively) would risk them becoming insolvent – probably unhelpful.

There may be some merit in measures to penalise the owners/promoters of housing sites that have remained undeveloped for, say, five or more years. This might involve either removal of the site from the land supply altogether (although planning authorities should be able to exercise some discretion) or, less drastically, an annual charge for retaining land in the supply could be imposed – starting at a nominal level but becoming more swingeing for aged undeveloped sites.