

## NATIONAL PLANNING FRAMEWORK 4 HOUSING TECHNICAL DISCUSSION PAPER

### *Comments by Jackton & Thorntonhall Community Council*

We address the questions posed at the end of this submission but also have some comments on the text as follows.

“Targets for the use of land” should be just that! (at present the “Housing Land Requirement” is actually expressed in numbers of units and not in area of land required).

1.3 This considers the requirement for housing land but the HNDA produces only projected households (and changes). At present Local planners translate households into land requirement – is this going to be done centrally, if so, how? If not, why not?

Also 1.3 alternative scenarios to be assessed by CHMA -so will be a central decision. Is CHMA equipped to deal with this task? What criteria will they use to assess the alternatives?

#### **“The ability for regional groupings to work together on an HNDA remains in place”**

Oh, how does this work? It is an ability, not a necessity? Isn't central government running the HNDA?

#### **“The Scottish Government could run the first steps, steps 1 and 2, of the HNDA tool using default scenario and assumptions”**

Does this mean only 1 scenario? What assumptions will they need to make and how will these be arrived at?

**“It is recognised that HNDAs are now an established part of the process for the LHS and local development plan and in some areas authorities may wish to reflect functional housing markets<sup>1</sup> that cross local authority boundaries. In this instance, and where regional groupings and HMPs have formed, they could propose alternatives to the HNDA output at local authority level for the areas within their region where there is evidence to support this. Any proposal for change would need to be evidence based, agreed by the HMP (including key wider stakeholders such as Homes for Scotland), be supported by evidence, and be assessed by the CHMA within the timescale required for Draft NPF4.”**

So, who will decide whether or not to use functional housing markets? What if a planning authority is split over more than one functional HMA and some partners want to use this facility and others don't? Why are Homes for Scotland to be involved?

**“Given the long term perspective on the supply of land for housing we are seeking to establish, the Scottish Government could apply a level of flexibility to the output from the HNDA tool for each local authority area to establish the minimum housing land figure.”**

So, despite planning authorities being given flexibility and ability to adopt own scenarios, central gov't will still over-ride this? Does this mean that the minimum might be less than the HNDA tool provides? If so, by how much? This also refers to housing land, but it means housing units?

**“Housing land figures would be set out in the draft NPF and be subject to public consultation and transparent scrutiny when it is laid before Parliament.”**

What form would this public consultation take? Who would decide if any modifications were required as a result of the consultation?

**“an agreed proportion of this land should be ‘deliverable’ whilst the remainder should reflect the longer term spatial strategy for the area. The policy and / or guidance could provide clarity on what is expected to be deliverable land, as well as addressing longer term strategy.”**

What is meant by “deliverable”? Is this different from “effective” or “effective supply”? The policy needs to be very clear, explicit and reasonable in its definition of this term.

### **1.7 Issues for consideration**

Respondents to the early engagement may wish to consider the following issues:

- What is your view on the guiding principles set out above?

They do not reflect many of the objectives of SPP (sustainable development for example)

They are muddled in talking about housing land when they mean housing output

They are vague – what does “deliverable” mean

- Should NPF contain housing land figures for all areas in Scotland or focus on certain areas?

If it is a national framework, it should be applied nationwide

- Are there areas in Scotland where an alternative approach may be more appropriate?

See above

- What is your view on the proposed approach to setting out requirements for housing land?

If the ambition is to achieve a slightly worse outcome than the present system delivers, then it is ideal.

It misses the opportunity to improve on the present system by failing to seek to improve delivery of housing that alters the housing stock to best fit the changing needs of the population (e.g. ageing, single adult households). HNDA should deliver a much more granular output to identify the types of housing required at the margin.

It also misses the opportunity to set housing land targets – it sets targets instead for housing output and does not make any attempt to set appropriate density levels. The present situation where land is used hugely inefficiently is perpetuated quite needlessly

- Should NPF provide a single housing land figure or a range?

A single figure keeps things simple and avoids different figures being adopted by each planning authority

- Is the HNDA Tool an appropriate mechanism to base housing land figures on?

Its output is not sufficiently granular (see above)

- Should there be scope for local and planning authorities working together to reflect functional housing market areas that cross local authority boundaries? What approaches could be used to achieve this?

Yes, the present system of City Region co-ordination is established and works tolerably well.

- Should NPF apply a level of flexibility to the HNDA tool results to ensure a proactive approach to managing the supply of land for housing in a positive way? Should the level of flexibility be informed by recent housing completions?

The meaning of this question is obscure. Why use a tool and then over-ride the results?

- Should NPF housing land figures be met in LDPs as a minimum?

There would be little point in producing NPF figures if they were to be ignored by LDPs

- LDPs are moving to a ten year timeframe. Housing land audits generally programme land supply for a five year period. For LDPs to have a ten year land supply available upon adoption what mechanisms could be used to ensure land is brought forward in accordance with the LDPs spatial strategy?

This could be assisted by publishing the LDP's draft spatial strategy prior to making a call for sites. The practice of "programming" land supply is a waste of time and produces nonsensical and unhelpful results. What matters is whether a sufficient supply of land is available to meet demand over the plan

period. It doesn't matter in what order the land is developed or whether development occurs steadily or erratically.

- Should the Scottish Government play a role in the housing land audit process?

The Scottish government should seek to ensure that housing audit density assumptions in audits reflect accurately the type of housing required so that land is used as efficiently as possible. The role of Homes for Scotland in the HLA process should be downgraded to consultative rather than prescriptive.

Scottish Government should also make clear that all land in the established land supply that is free of development constraints and is therefore capable of being developed must be considered as "effective" (from the date at which development constraints are removed). See comments on "programming" above.

The present Housing Land Audit process is cumbersome, labour-intensive, and produces results of doubtful accuracy. There is a strong case for replacing the current system with a "real time" distributed database that would provide timely and accurate results and thereby improve control and management of the process. Such a system could be developed easily and cheaply.