

## NATIONAL PLANNING FRAMEWORK 4 HOUSING TECHNICAL DISCUSSION PAPER

Perth & Kinross Council officers endorse the comments made on the Technical Paper by HOPS. Some additional comments are set out below.

### Issues for consideration

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

Providing clarity and reducing conflict and complexity should not be at the expense of allowing local authorities to vary requirements according to local circumstances.

'Housing land targets' – is this the current housing supply target, housing land requirement or something different? Is the Scottish Government looking at introducing a volume of land requirement rather than housing numbers?

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

If the NPF were to only focus on certain areas, then this could be most usefully be done for the former city regions in determining cross-boundary housing markets areas and then apportioning the target between the different authorities.

- Are there areas in Scotland where an alternative approach may be more appropriate?
- What is your view on the proposed approach to setting out requirements for housing land?

Is the suggestion that local evidence will be updated and the appropriateness of the housing land figures tested through the LHS (in its 5 year review) rather than through either the LDP or an interim update of the LDP? Unclear how this would work given that the interpretation of HNDA outputs, particularly on affordable need, is not just about numbers but instead requires an appropriate planning policy response.

Authorities will be able to propose alternative scenarios and assumptions, but these will need to be agreed with stakeholders i.e. Homes for Scotland. In the past it has been difficult to reach agreement with Homes for Scotland on land allocations although the preference is that a consensus is reached. Also, the proposing of alternatives will likely need some HNDA work at the local level but this is supposed to follow on from the setting of targets for each planning authority area by Scot Govt.

Updating of data between draft and revised draft NPF – experience suggests any updating can have significant implications on the end results e.g. if population projections are revised up or down. What happens then if planning authorities have already started working on their 'local' HNDA to drill down to HMA level for LDPs? Or does all that have to wait until NPF4 is finalised?

Proportion of land that is deliverable – when will this proportion be decided? This could have implications for site selection process through LDPs.

National approach to be informed by local knowledge – realistically will the timescales allow for this?

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

If this requirement is going to be expressed at a 'target' then this implies a single figure which should be met. A range perhaps implies more flexibility. The issue with identifying a range is that the development industry is likely to push for the land allocations to meet the higher end of the range and communities are more likely to want the lower end with the planning authority having to justify its position either way.

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

Yes but is the CHMA well enough resourced to be able to be able to assess alternative scenarios potentially for all authorities across Scotland at the same time within the tight NPF4 timescales?

- 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?

The former city regions already have mechanisms in place for working together although, given that these regional groupings will presumably be voluntary (like RSS) what happens in the event that a functional HMA boundary is identified which crosses local authority boundaries but no agreement is reached between those authorities to work together?

- 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 NPF should not seek to artificially inflate the supply of land for housing other than to incorporate flexibility to allow for sites failing to come forward or delivering more slowly than programmed (as is currently the case between housing supply targets and housing land requirements). Many parts of the country are still struggling to see a return to pre-recession completions as it is and requiring planning authorities to allocate even more land to ensure additional flexibility will not necessarily mean that more houses are delivered; delivery on the ground is not something which planning authorities can control on the majority of sites and this could potentially have a detrimental impact on other strategy focuses such as urban regeneration and the reuse of brownfield sites as developers will understandably opt to concentrate on the less complex greenfield sites first.

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

Any figures identified in the NPF are likely to be viewed by the development industry as a minimum regardless of whether this is specified or not. Communities on the other hand are more likely to view figures as a maximum so it is important that the NPF gives clear direction to planning authorities either way.

- 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?

Some LDPs already include a policy on maintaining an effective housing land supply. An inherent problem with the current system is that the housing land calculations are nearly always out of date by the time the LDP goes through the consultation and then examination processes. In some ways it is therefore meaningless to include the calculations within the LDP itself. Perhaps an LDP policy combined with some form of housing background / technical paper which would be updated annually would be a better approach. This could perhaps be incorporated into an annual delivery programme tying up with the annual housing land audit.

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

It would help ensure consistency of approach if a standard methodology for how audits are carried out (e.g. what is considered a completion) was introduced but this may be better determined by local authorities themselves through HOPS rather than by Scottish Government / consultants.

- Other comments

Should we have different use classes for self-build affordable housing, private rent

and mid-market rent? If not then how do we ensure the correct mix is provided on sites?

There is a need for clear guidance on assessing the need for traveller accommodation. This need is often cross boundary and therefore perhaps warrants a more national level response.