

Our Ref:WDC/NPF 4 HTS  
Date: 29 April 2020



██████████  
Assistant Chief Executive,  
Planning and Architecture Division,  
The Scottish Government,  
Victoria Quay,  
Edinburgh,  
EH6 6QQ

Dear ██████████,

### **West Dunbartonshire Council Response to NPF4 Housing Technical Discussion Paper**

The Council welcomes the opportunity to comment on the above discussion paper and is looking forward to working closely with the Government on the development of policy and guidance setting the context for housing planning and development within the new planning system and National Planning Framework 4 (hereafter referred to as NPF 4). The Council supports the response from the Glasgow City Region Housing Market Partnership and HoPS to this technical paper; however, the Council also wishes to make its own comments and suggestions to how it sees the housing being planned for and delivered going forward into the new planning system.

The Council's role in planning for housing and delivering housing with partners through our More Homes programme is critical to ensuring that we provide enough housing (be that land or houses) to meet the needs and demands of our residents. However, planning's role in delivery of housing requires to be better defined to move away from the arguments that have plagued the current planning system i.e. the fixation on housing numbers, in terms of the Council's role in delivering housing.

The Council therefore supports the intention to bring greater clarity to this debate as the time and effort spent on agreeing, debating and arguing at examination on housing numbers for example, is an ineffectual use of planning resources for the Council. Therefore, the Council wants to move the debate more fully onto the role of planning in supporting development delivery and the creation of great places and away from the numbers game.

The Council also urges the Government to clarify the role and limitations of planning's role in the delivery of private housing land. At the moment, planning is being portrayed as direct barrier to housing delivery in some quarters, whilst being championed as an

enabler in others. Therefore, greater clarity to address these issues is required and agreement on the actual role is desperately needed. This is recognised in the Government Background Information Note on “Enabling Delivery of New Homes”, which states that:

*“Completion rates have risen and fallen in line with the economy and wider social and housing policy changes including national targets for the delivery of affordable homes. Planning policy relating to housing has evolved, **but there is no definitive evidence establishing a causal link between national planning policy and completion rates.**”*

There has to be a universal recognition that Private housing delivery, (whether a site is developed and the rate at which it is delivered), is influenced by drivers beyond the availability of consented land and outwith the planning powers of the Local Authority. This issue itself has been the central challenge by private housing developers in numerous examination of Local Development Plans and planning appeals and especially in relation to the Council’s current Local Development Plan 2, which at the time of writing this response, was still at examination.

There has to be common sense and a realisation that the Council’s role in the delivery of private housing land is to allocate land which is developable and the role of the house builders is to develop that land, instead of constantly developing methodologies and arguments to get more land allocated which they want to build on instead of developing the land already allocated within the plan which they don’t wish to develop on due to marketability issues etc. We also have to move away from the assumption that if houses are not built at the rate set per year, then it’s the Council’s fault for not allocating enough land and that more should be allocated to address under delivery in previous years. This is a wholly unsustainable approach which doesn’t really look into why land is not being built i.e. is there enough construction workers to build or is it other reasons which have not been disclosed by the industry. It is the Council’s premise that the role of planning is to allocate land to meet a need over x amount of years. That land is not lost for development and any under delivered units should not be added to the land supply going forward. The Council therefore requests strong guidance and final position from the Government on this.

As mentioned above, it’s the Council view that we need to move away from a Targets based system. We should be creating well-designed sustainable places for people that focuses on a green infrastructure first approach enabling the creation of health housing developments for all. In carrying out this review, we should be mindful of the wider considerations taking place through the Housing to 2040 conversation, not least in respect of equality outcomes and what they may mean for tenure “balances” in the future.

In addition to the points made above, the Council also provides detailed comments to the issues raised in the technical paper. This is attached as appendix 1 to this covering letter.

Should you wish to discuss the contents of this letter the please contact either John Kerr, Housing Development and Homelessness Manager: [john.kerr@west-dunbarton.gov.uk](mailto:john.kerr@west-dunbarton.gov.uk) or myself using the contact details on this letter.

Yours faithfully



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