



scotplan@gov.scot
BY EMAIL ONLY

30th April 2020

Dear Sir/Madam,

**NPF4 – CALL FOR IDEAS
REPRESENTATIONS BY WALLACE LAND INVESTMENTS**

Wallace Land Investments (Wallace) are an Edinburgh based business who specialise in the promotion and delivery of strategic housing and mixed-use development projects. Wallace welcomes the opportunity to respond to the Scottish Government's Call for Ideas in respect of National Planning Framework (NPF) 4.

Overview

It is recognised that the new NPF will incorporate Scottish Planning Policy (SPP) and targets for the use of land for housing across Scotland. On the basis that it is expected to have a longer timeframe to 2050 (albeit with an obligation to review no later than 23 June 2024; and at least once in every 10 year period thereafter); NPF4 could be particularly significant insofar as housing policy is concerned over this period.

Whilst NPF4 covers a wide range of policy matters, Wallace does have a particular interest in the number of and type of homes that is required across Scotland. This response therefore responds specifically to housing land matters. It has had regard to the 'Call for Ideas' and Housing Technical Discussion Paper.

Furthermore, Wallace is an active member of Homes for Scotland (HFS), who has submitted a detailed response to the Call for Ideas consultation. Wallace has contributed to that submission and accordingly supports their representation.

Use of land for housing across Scotland: Priorities

In overall terms, Wallace is particularly keen to ensure that NPF4;

- Classifies new homes as infrastructure.
- Sets a Pan-Scotland all-tenure housing delivery target of at least 25,000 homes per year.

unearth the hidden value

Telephone
0131 516 9296

Address
2 Coates Crescent,
Edinburgh EH3 7AL

Online
info@wallaceland.co.uk
www.wallaceland.co.uk

- Sets minimum delivery targets for each local authority totalling at least 25,000 homes per year.
- Identifies the pan-Scotland housing delivery target of at least 25,000 homes per year as a National Development.

In addition to these priorities, Wallace is also supportive of the following;

- LDP targets should be informed by more complete evidence of need and demand, picking up those households overlooked by HNDAs at present.
- Homes for Scotland and its members should have a greater role in collaboratively scoping and selecting targets and housing delivery policies.
- The requirement to maintain a 5-year supply of deliverable housing land should at all times be retained.
- A standard methodology for assessing whether or not a 5-year housing land supply is being maintained and remedial actions if there is a shortfall should be agreed to eliminate continuous debate and instead focus on delivery.
- LDPs should identify deliverable sites for the full 10-year plan period – and indicate a longer term supply of land over 15-20 years.

In recent years, as has been seen in planning applications, appeals and development plan examination cases, housing delivery has been affected by a number of issues such as incomplete / inadequate evidence in respect of housing need and demand; low targets set by Council's that are not supported by evidence; insufficient application of generosity allowance; inconsistent methodologies adopted by different authorities in the identification of land in Housing Land Audits (HLAs).

NPF4 represents an opportunity to bring clarity to the delivery of housing across Scotland and ensure that it is not unnecessarily constrained by these issues. Further information is set out in representations submitted by HfS; of which Wallace is supportive of.

Summary

Wallace welcomes the opportunity to respond to the NPF4 Call for Ideas consultation. Wallace has a particular interest in the use of land for housing and the associated policy framework and methodologies for calculating housing land need and demand; and setting of targets. Wallace would welcome the opportunity to be involved in any working groups related to these matters to assist the Government in the lead up to the draft NPF4.

Wallace has identified key priorities that we would seek to be included in a draft NPF4 in due course. These align with the 'Priority Asks' set out by HfS in their submissions to the NPF4 call for ideas consultation. As an active member of HfS, Wallace supports the detailed representations submitted by HfS in this regard.

Yours Faithfully

