

Q&A

- [Letter](#)
- [Method Paper](#)
- **Response Template** – download from: [Resources | Transforming Planning](#) / Housing
- [Guidance](#)
- **Excel Calculator** – download from: [Resources | Transforming Planning](#) / Housing
- [Presentation Slides](#)

METHOD

Q1 How is the statutory requirement to be met for NPF to include ‘targets for the use of land in different areas of Scotland’?

The Minimum All-Tenure Housing Land Requirement is intended to meet the requirement of the Act.

Q2 What is the thinking around a ‘minimum’ figure, which could result in outcomes contrary to climate change and biodiversity objectives?

The Method Paper explains the minimum all-tenure housing land requirement will be the minimum amount of land to be identified within LDPs. It is expected that LDPs allocate at least the minimum requirement. The implications of a higher level as part of a planned approach would be considered through plan preparation, including the Strategic Environmental Assessment process.

Q3 Given that the NRS projections are trend based, when will the opportunity come to apply policy adjustments to these figures.

The current stage of local consideration of the Initial Default Estimates by authorities and stakeholders provides the opportunity to apply policy drivers, resulting in Locally Adjusted Estimates. We will also consider whether the outputs from authorities need to be adjusted to reflect the national spatial strategy as it emerges. As LDPs are prepared, there will be an opportunity to update evidence, including policy drivers (see Q22 below).

Q4 Can alternative inputs be used for Existing Housing Need?

Yes – Local authorities should use the best available data they have. The figures provided are a [starting point](#) for authorities and stakeholders. The overall approach provides for stakeholder input and for alternative evidence to inform the figures where it is robust. There is, therefore, opportunity for stakeholders to raise any matters and for robust evidence to be provided for adjusting the existing housing need input.

Q5 Is the existing need figure in the calculator to be applied irrespective of the LDP adoption date?

Yes – It is an estimate of the number of households in existing need that will require an additional housing unit. It is important that any figures included in NPF take account of the scale of existing housing need. It is an important factor in planning land supply and is therefore one of the three inputs to the Minimum All-Tenure Housing Land Requirement for NPF4.

We recognise that existing housing need will differ locally around Scotland reflecting different housing market dynamics. This is why authorities can choose to adjust their existing housing need based on local circumstances. Need is constantly evolving and authorities will update their information as they prepare HNDAs, LHSs and LDPs. It is important that the LDP process is

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sufficiently flexible to allow for this information to be updated, to account for its continual evolution and ensure LDPs are appropriate to the time of their preparation (see Q23 below).

The method produces estimates that are indicative over the longer term – it is not an exact science. We want to move away from protracted debates on producing definitive figures that relate only to a snap shot in time. We want to produce figures that have a sound basis, that represent what we want to achieve and that are understandable.

Q6 Won't existing housing need evolve depending on the position at LDP adoption? Should this step be added through LDPs, if necessary?

It is important that any figures included in NPF take account of the scale of existing housing need.

Need is constantly evolving and authorities will update their information as they prepare HNDAs, LHSs and LDPs. It is important that the LDP process is sufficiently flexible to allow for this information to be updated, to account for its continual evolution and ensure LDPs are appropriate to the time of their preparation (see Q23 below).

Q7 If an emerging HNDA uses and refines the same baseline info as the NPF4 figures, can it proceed ahead of NPF4 approval?

Yes - Authority work on HNDA should continue to inform current work relating to housing and planning. We do not want to duplicate, add unnecessary work or delay the wider HNDA. Whilst there will be overlaps, there will be a different assessment process for HNDA and NPF4 housing land figures. The criteria for the different assessments are clear in respective guidance documents.

Q8 What policy adjustments are the Scottish Government intending to apply to these figures?

The flexibility allowance for rural areas is higher than urban areas to reflect the statutory requirement in the Planning Scotland (2019 act, that NPF must contribute to the outcome of increasing the population of rural areas of Scotland. The period of local consideration enables authorities and stakeholders to consider the policy drivers relevant to their particular circumstances. The Guidance Document indicates that policy evidence is one of the core processes used in assessing the responses from authorities. If there are relevant policy considerations not taken into account we will liaise with authorities on the matter.

Q9 Is the 10 year completions data provided, for the calendar or financial year?

The completions data is a 10 calendar year data set – 2010 to 2019.

Q10 How have the flexibility percentages been arrived at?

This is set out in the Method Paper at page 6. The current SPP expects a 10-20% increase to housing land targets to provide a generous supply of land. The flexibility percentage is aiming to achieve a similar outcome. The current plan period is 5 yrs, whilst the future plan period will be up to 10 yrs. We have therefore increased the percentage to recognise a greater potential for changes in circumstances to affect sites and that some sites could take longer to bring to delivery. The increased percentage therefore provides flexibility to ensure an ample supply of land over the term of the plan.

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There is also an urban / rural split. This is based on population density, with less than 1 person per hectare considered rural. The rural % is higher to reflect the outcome specified in the 2019 Act of increasing the population of rural areas of Scotland.

This approach is intended to reflect the move in NPF4 towards estimates that are indicative over the longer term.

Q11 How can the 25% addition be justified as being in the long term public interest?

The Method Paper indicates that the flexibility allowance, expressed as a percentage, represents a contingency of over-programming of land to allow for changes in sites coming forward. It is in the long term public interest to ensure there is sufficient land available to meet future requirements, in the knowledge that over time there will be changes that effect whether sites come forward or not. We want planning to be less reactive and take an earlier, more directive approach to where new development should take place. Allocating land in line with the spatial strategy for the area, will assist in achieving the intended outcomes for that area.

Q12 Why are NB2s used for the completions data and not Housing Land Audit outputs?

NB2s are submitted and collected systematically. They are consistent in that they are quality assured and formally published. Whilst there is best practice guidance on Housing Land Audits, there is no standard approach. They are not collated or quality assured. Following [previous research](#), we are currently considering the approach to Housing Land Audits as part of the wider work on future housing policy.

Where an authority wishes to consider a different completions figure to that published by the Scottish Government, due to any data quality concerns, the Scottish Government would take this into account when assessing any case for change.

Q13 What is meant by Park Plans?

Slide 15 of the presentation, covering the range of evidence that could inform adjustment to alternatives, refers to 'Park Plans' – this refers to 'National Park Plans', which set out policy for managing the National Park.

Q14 Why is land supply not a consideration?

Land supply is the cornerstone of the work. As a plan is prepared it should consider land supply afresh and not roll forward existing allocations. Where planning permission exists for a site, monitoring of delivery would be expected via the Delivery Programme. Looking at sites afresh as plans are amended or reviewed could lead to site de-allocation or other mechanisms being promoted to support delivery of the site, such as Compulsory Purchase.

Q15 The timescale for inputting policy considerations to the NPF4 figures is between the date of the letter and 4 June. This seems very tight and limits what can be achieved without impacting other work commitments.

We are conscious of authority and stakeholder resources, particularly during this unusual time. We have aligned two of the three inputs to be considered with the existing HNDA process that is well established and well known to authorities. This is with a view to enabling efficiencies instead of creating additional work. All authorities will have existing HNDAs in place therefore consideration is likely to involve updating of information instead of starting anew. The period of over 3 months,

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provides opportunity for collaboration with stakeholders to inform the adjustments but it will be for the authority to reach a final decision in a manner which uses the resources they have available.

Q16 Is this the only stage of consultation in relation to the setting of requirements prior to the figures being set out in NPF4?

The current period of local consideration is the opportunity to provide input prior to Draft NPF4 being submitted to Parliament. It will then be subject to Parliamentary scrutiny and public consultation before NPF4 is published.

GEOGRAPHIES

Q17 How does the NPF4 housing land work link to indicative Regional Spatial Strategies (iRSS)?

Feedback has recently been provided on the iRSS work. This confirms that the content of iRSS is for the relevant authorities but notes to bear in mind that work on housing land figures for NPF4 is progressing. However, we do not expect iRSS to include housing land figures.

Q18 What role do Housing Market Areas have in the process?

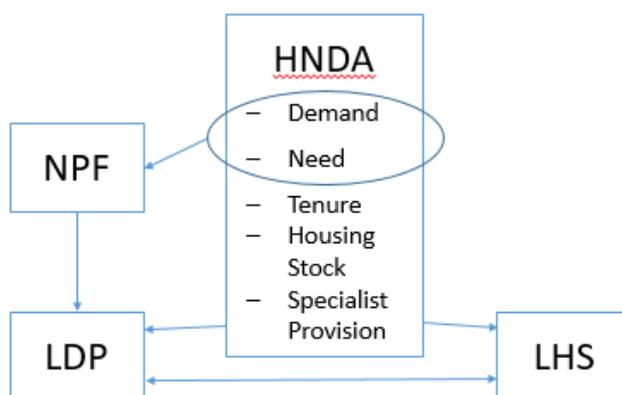
Understanding HMAs and the dynamic of them is important. We would anticipate some authorities may want to take this into account in their considerations. The approach provides the ability to work across boundaries, in regional groupings with neighbouring authorities and where that is preferred, HMAs will be particularly relevant. How the cross-boundary implications have been taken into account can be evidenced in the Response Template and if proportions of the requirement are accommodated in other areas this should be identified. The intention is for draft NPF4 to include figures at local authority level therefore we do not require an output at HMA level.

Q19 As part of justifying an increase in the NPF4 housing land figures would an authority have to identify which other authority it is taking those households from?

Where an authority accommodates a proportion of the requirement from another authority, this should be agreed collaboratively between the relevant authorities and confirmed this is the case by each in their Reponse Templates.

LINKAGES

Q20 What will be the relationship between HNDA, LHS, and LDPs?



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We see the existing important links between HNDA, LHS and LDPs remaining into the future. HNDA is and will continue to be a requirement for both the LHS and LDP process.

The LHS will remain on a 5 year review timescale, whilst LDPs are moving to being reviewed within 10 years. The LHS will therefore be reviewed at some point within the LDP timeframe and be a useful sense check on whether the LDP remains appropriate.

There is a current requirement for the LHS to include a summary of the level and type of housing to be delivered over the period of the LHS, and crucial to this is the setting of a Housing Supply Target (HST). LHS guidance requires that the HST should be split into market and affordable and expressed at both local authority and functional housing market area level. These can be used to inform the new planning processes but there is no requirement to replicate them.

We expect future LDPs to be informed by the full HNDA and anticipate that the work done for NPF4 figures, that equate to steps 1 and 2 of the HNDA process, should align with the full HNDA. The same inputs or assumptions can be used rather than duplicating effort. We acknowledge in reality, timings may not always fit – evidence may need updated - so there is a need for the process to be dynamic and to be able to take on board the context at the time whichever document is being prepared.

A full HNDA is important to inform wider understanding of the housing system in an authority area for both LHS and LDPs. Information around tenure, specialist provision and considerations for reuse of existing housing stock are likely to increase in significance given the future direction of travel for policy indicated in the Position Statement.

We are currently working on revising the planning for housing policy and have given a steer on the direction of travel in the Position Statement. Work on future regulations and guidance for developing planning is also underway. Those work streams and this work are progressing in close alignment.

Q21 Can figures in future LDPs be different to NPF4?

There is a statutory requirement for NPF4 to be taken into account in the preparation of LDPs, there is not a requirement for them to be consistent. We would however, expect the requirement in NPF4 to be the minimum amount of land allocated in plans. This is an improvement on the existing system as NPF4 will be a starting point for each plan to build on.

Plans will be prepared after NPF and in the intervening time the evidence used to inform the inputs may be updated, for example household projections or local need figures, and local, regional or national policy drivers may change. We would therefore anticipate the LDP process to refine or update the figures to take into account updated evidence.

Q22 Will NPF4 figures supersede existing LDPs?

[Transitional Guidance](#) sets out that any given version of the NPF becomes the ‘current’ version when it is published, after being approved by Parliament and then adopted by Ministers. When published it will be part of the Development Plan. In the event of any incompatibility between a provision of NPF and an LDP, legislation provides that whichever is the later in date is to prevail. This means that once NPF4 is adopted, it will prevail if there is an incompatibility between figures in it and the figures in existing LDPs. Figures in a later LDP, once it is adopted, would, in turn, prevail over figures in NPF4 if there was an inconsistency.

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Draft NPF4, to be published in autumn 2021, will not be the adopted version. It will be for decision makers to consider and apply any relevant weighting in decision making. The figures contained within it will be subject to public engagement and Parliamentary scrutiny and will not supersede adopted LDPs.

POLICY

Q23 What is the policy context if NPF4 policy is not known?

NPF4 is in preparation, however the [Position Statement](#) sets out the direction of travel for national planning policy. This, along with [Housing to 2040](#) and the first [national population strategy](#) indicate that NPF4 will make a substantial shift in our approach to planning for housing.

The content of the current SPP is heavily focused on the quantity of housing and the process to arrive at them. This can be complex to understand, resulting in disagreement and confusion. We want to address this in NPF4 and the Position Statement points towards greater emphasis on delivering a wider range of good quality homes: homes that are energy efficient, are in accessible locations, and its looks to see more re-development as well as being stronger on brownfield over greenfield. It also refers to having a steady pipeline of land and releasing longer term sites as homes are delivered.

NPF4 will be part of the development plan and have a role in decision making. We therefore expect the policy to be written in a style that is different to the current SPP to support development plan decision making.

We expect to put the Draft NPF4 before the Scottish Parliament for their scrutiny and public engagement in the autumn of this year.

Q24 What is the role of Housing Supply Targets (HSTs) and related implications for shortfalls?

Within the planning system, HSTs are part of the current policy approach in SPP 2014. Shortfalls are a consequence of this too. In NPF4 we are signalling a new approach - with a focus on housing land, rather than the number of homes to be delivered. NPF4 figures will be the basis for LDP figures in the future with new terminology – this is explained in the Method Paper. We do not want to create confusion from mixing policies and approaches and will consider any transitional implications as the new policy is developed, however the intention is to provide a single figure in NPF, which is a housing land requirement.

Within the housing system, there is a current requirement for the LHS to include a summary of the level and type of housing to be delivered over the period of the LHS, and crucial to this is the setting of a Housing Supply Target (HST). LHS guidance requires that the HST should be split into market and affordable and expressed at both local authority and functional housing market area level. These can be used to inform the new planning processes but there is no requirement to replicate them.

Q25 Do the elements of policy and guidance that refer to Housing Supply Targets (SPP paras 115-120), HNDA Managers Guidance and LHS Guidance) remain relevant and if not what will replace these and when?

SPP is relevant to the plans progressing under current processes. NPF4 will provide new policy content for planning for housing as well as the housing land figures, which will inform the

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preparation of future LDPs. The Position Statement sets out the direction of travel for policy in NPF4.

The HNDA Managers Guidance and LHS Guidance remain relevant to the preparation of the respective documents.

Q26 Is the need to provide a 5 year land supply to be removed from NPF4 and will there be no comparison between the HLR and the land supply?

The Position Statement indicates that we intend to replace the focus on maintaining a 5 yr supply of effective housing land with a longer term perspective. It refers to maintaining a pipeline of land: including shovel ready land that can be developed in the short term and a long term supply that can be bought forward for release as sites are built.

Following [previous research](#), we are currently considering the approach to Housing Land Audits as part of the wider work on future housing policy.

Q27 How do we enable delivery of quality housing in areas not attractive to the house building industry?

We want planning to shift to be more directive about the quality of places, including by guiding where new development should happen and how those developments can deliver more for new and existing communities.

Changes made via the package of planning reform look to enable authorities to focus their resources on place and delivery, emphasising planners role in co-ordinating levers across authorities, wider public sector and the private sector to support delivery of sites that achieve the wider outcomes intended.

NPF4 will be accompanied by a Delivery Programme that will form the basis of continuing collaboration to ensure it is effectively implemented. Delivery Programmes will also accompany individual LDPs, and we intend to provide guidance on what they should contain and how they should be used corporately within authorities.

Q28 How does this work tie into the work on vacant and derelict land by the Scottish Land Commission?

Re-use of vacant and derelict land is highlighted throughout the Position Statement. Potential policy changes are noted that proactively bring forward good opportunities for quality homes in places that would benefit from them, including vacant and derelict land.

Q29 Are there implications of the SPP amendment and the legal challenge on the NPF4 housing figure calculations?

The SPP, as amended, is Scottish Ministers' current national planning policy. Legal proceedings are underway therefore it is not appropriate to comment on them. We will consider the implications of the judgement once it is made.