



RTPI

mediation of space · making of place

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Dear Dr Scott

Firm Foundations: the future of housing in Scotland

The Royal Town Planning Institute (RTPI) welcomes the opportunity to respond to this consultation which raises important issues about the role of planning in the provision of housing land and seeks to increase housing choice and contribute to the creation of sustainable mixed communities.

The RTPI is the UK body chartered to represent the planning profession and offers these comments from the point of view of a diverse and policy neutral professional body committed to supporting devolved government in Scotland. The Institute has approximately 1900 members in Scotland working across all sectors of central government, local government, government agencies, the voluntary sector, private consultancy, the development industry and academia. Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee, with the responsibility for working with government and public bodies generally for the improvement of the planning system in Scotland. This is in accordance with its charter obligation to work for the public interest.

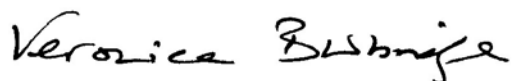
The RTPI does not wish to respond to questions regarding the role of private landlords, housing finance or tenant rights. Our response to questions relating to planning are set out in the attached annex under the questions given in the consultation paper. The main points are summarised below.

Summary

- the Institute supports the vision of increasing housing supply in Scotland and recognises the usefulness of specifying a target against which progress may be measured. However, further clarification of how the figure of 35,000 was derived and of how the figure will be split geographically and by tenure would be helpful;
- the Institute agrees that co-operation amongst local authorities will be important to give practical effect to the overall ambition and suggests that this should build on experience already gained in structure planning. The new Strategic Development Plans for city regions will have a crucial role to play in addressing this issue in the future. More formal arrangements than exist already may be needed in areas adjacent to but not included in strategic development planning areas;
- additional support would be welcomed but this should complement rather than duplicate local authorities' functions. The provision of specialist advice should include the calculation of strategic housing land requirements (including demographic projections); provision of regional market data with a national baseline, and the development of national housing models with regional outputs etc.;
- land release alone will not achieve the target set, this must be supported by infrastructure funding that complements the development strategy;
- a major challenge is that the statutory planning system on its own cannot deliver the considerable affordable housing needs identified in a market led economy. Many issues of concern relating to implementation and funding of affordable housing lie outside the scope of the statutory planning system. The delivery of affordable housing must be based on partnership working and an understanding of the funding regimes of all stakeholders;
- the Institute supports the need for greater integration between local housing strategies and development plans as recommended in the review of SPP3. However, we consider that a presumption to enable planning permission to be granted for developments in advance of land being designated in a development plan in circumstances where a demonstrable shortfall of housing exists could result in piecemeal development, could mitigate against long term settlement strategies and would be against the established principles of the new plan led system;
- the Institute agrees that new, expanded or stand-alone communities may be valid in some cases. However, this is a judgement that is best taken at regional level through the development planning system. New settlements may require significant new infrastructure and greenfield land resources and do not necessarily assist with regeneration; and
- provision of new housing is not just about numbers. Good design and quality of environments need to be fundamental concerns in all developments as do issues of ongoing maintenance.

The Institute trusts that these comments are of assistance and has no objection to its comments being made available to the public in the usual way. Should you wish any clarification or further assistance, please do not hesitate to contact me at our Edinburgh office: 57 Melville Street Edinburgh, EH3 7HL phone: 0131 226 1959, or email: veronica.burbridge@rtpi.org.uk

Yours sincerely



Veronica Burbridge
National Director, RTPi in Scotland.

RESPONSE BY THE ROYAL TOWN PLANNING INSTITUTE TO THE CONSULTATION 'FIRM FOUNDATIONS: THE FUTURE OF HOUSING IN SCOTLAND'

Question 1: Do you agree that aiming to increase the rate of new housing supply in Scotland to at least 35,000 a year by the middle of the next decade is a sensible and realistic ambition, and that this will help set a necessary political context for acceleration in housing supply?

1. The Institute supports the vision of increasing housing supply in Scotland and recognises the usefulness of specifying a target against which progress may be measured. However, further clarification of how the figure of 35,000 was derived and of how the figure will be split geographically and by tenure would be helpful. The main issues are not just about the target set but the quality and location of housing and the extent to which housing policies contribute to wider objectives e.g. of energy efficiency. Consideration also needs to be given to the capacity of the development industry to deliver, skills shortages, approaches to land banking, and to how public funding will support the higher level of housing investment through improvements in transportation, water and sewerage infrastructure and the funding of affordable housing. Land allocation in itself is insufficient and new build has to be taken forward within the context of an agreed development strategy for an area. The stated increase in housing provision will only be achieved if the process of delivery is also addressed. The target and associated actions should be defined in terms of all the regulatory systems which have a bearing on house building. In terms of the planning system the goal will also need to be stated in the National Planning Framework and relevant Scottish Planning Policy.

Question 2: Do you agree that, to give practical effect to the ambition, local authorities should co-operate regionally in setting realistic housing targets for housing market areas, and in enabling the delivery of these targets? If so, what arrangements should be put in place to support and provide incentives for such co-operation between relevant local authorities?

2. The Institute agrees that co-operation amongst local authorities will be important to give practical effect to the overall ambition. In the past, processes such as the Edinburgh and Lothians, Ayrshire and Glasgow and Clyde Valley Structure Plans have provided important vehicles for setting agenda for future housing programmes. The new Strategic Development Plans for city regions will have a crucial role to play in addressing this issue in the future. It will be important to recognise and strengthen these strategic planning processes within the city regions. Mechanisms for partnership working among local authorities and between local authorities and the building industries may differ across Scotland. It is important that these discussions are not seen in isolation and that they form part of the wider objective of sustainable economic growth and are set within clear settlement strategies. There may be issues in areas not covered by strategic development plans and the document might address such issues particularly in areas adjacent to but not included in strategic development planning areas. In such areas more formal arrangements than exist already may be needed.

Question 3: Is there a role for a specialist national function in strategic planning for housing? What expertise do you think this function would require?

3. The range of expertise in strategic development planning for housing will vary across Scotland and should build on the experience of Communities Scotland and the Scottish Housing Best Value Network. Additional support would be welcomed but this should complement rather than duplicate local authorities' functions. The provision of specialist

advice should include the calculation of strategic housing land requirements (including demographic projections). Some of this additional support might be used to provide regional market data with a national baseline, developing national housing models with regional outputs etc. This work should be closely related to the revision of SPP3 and PAN 38. Guidance is also needed on the strategic assessment of housing need in terms of affordable housing. For instance it is noted that local housing strategies may need to take more localised views of affordable housing need; social rented households are often less mobile than private households and if provision is to be addressed across wider housing market areas close dovetailing with transport policies etc would be required. Any proposed provision of affordable housing to meet needs in adjacent authorities is likely to require a strong steer from Scottish Government.

4. There is a need for close integration between local development plans and local housing strategies but it should be acknowledged that the land use planning system only has a limited role to play in the delivery of affordable housing and cannot address it in its entirety. We consider that national guidance should encourage more effective links between Development Plans and Local Housing Strategies and closer integration of planning and housing disciplines. Further guidance, in the form of a revision or supplement to PAN74, is required to detail closer working relations; to address issues surrounding the valuation of land for affordable housing and the value of commuted sums which may be received by Councils; and the development of methodologies for Housing Needs Assessments.
5. The introduction of the new development plan led system together with enhanced arrangements for s75 agreements should further facilitate the provision of affordable housing. At the same time, the new provisions under the Housing (Scotland) Act and the requirement for local councils to prepare housing strategies, should provide opportunity to establish better forecasts of housing need and give greater synergy between housing strategies and development plans.

Question 4: Even when land has planning permission there are still blockages that prevent new housing being built. What additional arrangements would, or could, accelerate development on land with planning permissions to help ensure that future housing supply targets are met?

6. The modernisation of the planning system should help in ensuring up to date development plans, however, many of the constraints may lie elsewhere and it is important that these are recognised. The release of land on its own will not in itself create completions. It is important that if development is to be accelerated the development strategy is supported through its implementation phase, be that in land acquisition or assembly, decontamination, through aligning infrastructure providers' capital programmes with the priorities in the development plan particularly at regional level. Providing public support funding for affordable housing particularly in areas where the market is weak e.g. in urban regeneration areas is also important.
7. A major challenge is that the statutory planning system on its own cannot deliver the considerable affordable housing needs in a market led economy. Many issues of concern relating to implementation and funding of affordable housing lie outside the scope of the statutory planning system. However, the spatial planning discipline has an important role to play in policy integration. Planning issues need to be examined within the wider macro-economic context which influences house prices and affordability and within wider objectives of creating and nurturing sustainable communities. In particular, the contribution to be made by the land use planning system needs to be set alongside efforts to address:
 - the specific role of new build in the overall pattern of supply across all tenures;

- issues of deficiencies in the quality of social rented housing stock and their local environs;
 - the development of new housing stock with a zero-carbon footprint;
 - mechanisms to retain the availability of social-rented homes as 'affordable' into the longer term;
 - more flexible and programmed approaches to housing finance;
 - a more transparent and more efficient approach to planning agreements; and
 - specific issues pertaining in rural areas.
8. We support the recommendations for integrated working practices within and between authorities on housing and planning issues and suggest that these should include: incentives and rewards for local authorities who perform their strategic housing roles well; and joint working between housing and planning departments and across strategic planning areas and community planning partners.
9. We recognise that delivery of affordable housing must be based on partnership working and an understanding of the funding regimes of all stakeholders. Affordable housing is an area of work where there is a need for a broader skills base for planning and closer collaboration between professional institutes, planners, developers and other professionals. Within this broad policy framework, we recognise the importance of working closely with the private sector in addressing delivery issues. Successful implementation will require clarity, consistency and certainty of policy; guidance on working arrangements involving local authorities, RSLs and the private sector; smooth and transparent development and operation of s75 agreements; and the development of agreed arrangements for programming, finance and patterns of housing provision. Such partnership working should also seek to encourage and share innovative good practice.
10. The Institute supports the report's identification of a need for greater integration between local housing strategies and development plans as recommended in the review of SPP3. However, we consider that proposals to create a presumption to enable planning permission to be granted for developments in advance of land being designated in a development plan in circumstances where a demonstrable shortfall of housing exists could result in piecemeal development, could mitigate against long term settlement strategies and would be against the established principles of the new plan led system.

Question 5: We have proposed that much expanded or new, stand alone settlements may be a valid solution. How should we best encourage the development of new, sustainable communities that are sympathetic to Scotland's landscape and environment?

11. The Institute agrees that new, expanded or stand-alone communities may be valid in some cases. However, this is a judgement that is best taken at regional level through the development planning system. In this regard, the development of processes by the Glasgow and Clyde Valley Structure Plan to identify Community Growth Areas might be noted. In general, new settlements require significant new infrastructure, use up significant greenfield land resources and do not necessarily assist with regeneration. Expansion of existing settlements where this can be achieved in a fully integrated manner, both visually and functionally may provide more sustainable use of existing infrastructure. This approach should also ensure that new housing can be provided with respect to the grain of existing places and their character.

Question 30: Do you agree that we need to find new ways of focussing on the quality of place / open space and greenspace within deprived neighbourhoods?

12. Provision of new housing is not just about numbers. Lessons learned in the past have led to a greater emphasis on the importance of greenspace and quality local environments in creating and sustaining sustainable communities and in supporting community well-being. Good design and quality of environments need to be fundamental concerns in all developments as do issues of ongoing maintenance. The new SPP11 provides requirements for an Open Space Strategy to address such issues of quality of greenspace and local environments and issues of green networks and environmental quality should be addressed in local development plans.