## FEEDBACK TEMPLATE

This template is designed for those leading discussions on housing beyond 2021 to complete after the discussion to provide to the Housing Beyond 2021 Team in Scottish Government. The completed form should be sent to the Housing Beyond 2021 mailbox at: HousingBeyond2021@gov.scot

This template can also be used by others (e.g. those who were unable to attend a discussion) to provide their views but it must be routed through the relevant policy lead official in the Scottish Government. Unfortunately, we are not able to process unsolicited e-mails to the mailbox.

Please complete each of the three sections.

# **SECTION 1: PARTICIPANTS**

# Scottish Government officials present (if any):

Name	Unit / Team	Ext.

Please add more rows as necessary.

# If no Scottish Government officials present, who led the meeting:

Name	Organisation	Phone / e-mail
Robbie Calvert	RTPI Scotland	01312299628

Please add more rows as necessary.

## Other participants:

Name	Organisation	
Craig McLaren	RTPI Scotland	
Anne Krippler	RTPI Scotland	

Please add more rows as necessary.

## **SECTION 2: ABOUT YOUR DISCUSSION**

Date:	
Location:	Edinburgh
(e.g. Edinburgh)	
Style*:	Regular meeting
Series**:	

<sup>\*</sup> If the discussion was added on to a business as usual meeting, select "regular meeting", otherwise choose the most appropriate description.

<sup>\*\*</sup> If the meeting was part of a regular series of discussions, please provide the name of the series (e.g. XY Working Group)

### **SECTION 3: FEEDBACK**

How to complete this section: please identify the main **theme** of the discussion (from the list in the **discussion document** at **Annex E**). If you discussed more than one theme, please reproduce the table below for each theme you discussed.

We do <u>not</u> need a full note of the discussion. Please try to provide as succinctly as you can a bullet point list of **ideas** for the vision or future options, **concerns** about current policy or practice or future proposals and **questions** for the Beyond 2021 Team either about the direction of policy or the process of engagement. It is useful if you can indicate whether these were widely shared in the group or from one or a minority of participants. They should be anonymous unless you agree otherwise with the participant(s). Please note that this material, or a summary of it, may be made published.

Theme:	Affordability and supply
(Suggestions for the future vision, themes or interventions – start, stop or modify.)	We need to be clear on who pays for infrastructure and what constitutes effective land so as to ensure the right housing developments can be delivered. We need to allow planners to plan for the best and most sustainable locations for housing and make sure we don't go down the expensive and time consuming route of planning by appeal.
	RTPI Scotland believes that any future Scottish Government must take a more active role to increase the number of quality homes built through:
	<ul> <li>prioritising its Capital Borrowing Powers to fund housing and infrastructure</li> <li>establishing a body or number of special purpose vehicles to work with local partners to coordinate and frontload infrastructure, deliver development and assemble land across Scotland</li> <li>the new NPF4, which should include the number of houses to be built in a specific time period with details of the tenure mix including provision of affordable housing in line with Local Development Plans and Strategic Housing Investment Programmes (SHIPs). The National Planning Framework, Strategic Development Plans and City Deals can integrate infrastructure to support existing and new development.</li> <li>strategic allocations need bring tied in with Scottish Government's Infrastructure Investment Plan.</li> <li>Long-term development of Scotland's transport infrastructure cannot be viewed in isolation from related land use planning consideration. Crucial to align transport infrastructure and housing delivery more effectively.</li> </ul>

It is important to invest in the next generation of those who will make housing happen, including planners.

Incentives should be created for developers to deliver on smaller parcels of land allocated in the plan. An example of such an initiative can be found in Edinburgh's Small Site Affordable Housing Program.

Opportunities to review investment tied up in roads bonds should be considered as a means of attracting smaller scale developers who may not have sufficient capital to deliver a site without financial assistance.

Planning needs to be involved with the corporate decision making in LAs to ensure joined up strategies to delivering more housing, for example tying in educational catchment planning with developer contribution towards education resulting from new developments. RTPI Scotland welcomes a provision for mandatory Chief Planning Officers in local authorities that was passed at Stage 2 scrutiny of the Planning (Scotland) Bill. We look forward to working with Scottish Government on drafting guidance for this amendment.

#### Concerns:

### Local Planning Authorities (LPAs) need properly resourced

(... about current or future policy, challenges, trends.)

Planning departments across Scotland have suffered disproportionately from budget cuts over the last few years. There has been a 23% decrease in planning staff between 2009 and 2016, while over the same period their planning service budgets were cut by 32.5%. In order to effectively resource the system RTPI Scotland proposes 5 key approaches to resourcing the system appropriately:

- Increase planning fees to ensure they meet their costs, or introduce a subsidy for planning authorities to overcome this shortfall
- Provide financial investment to support skills development and culture change programmes
- Introduce a ring-fence that ensures that planning fees can only be used for planning purposes
- Provide resources to support the implementation of new digital platforms and initiatives that can make Scottish planning a world leading service
- Commit to funding any new costs or resource needs generated through new duties introduced in the forthcoming Planning Act

The Planning (Scotland) Bill has major resourcing implications

RTPI Scotland's initial analysis of the Planning (Scotland) Bill shows that there are 88 new duties introduced resulting from stage 2 amendments. 63 of these new duties will fall on LPAs and 25 on Scottish Government. The cumulative effects of minor amendments could be profound in terms of resourcing. The duties have not been costed and no provision has been made for their resource requirements.

### **Questions:**

(... about the process of developing the vision or route map or policy questions for SG to consider.)

How can Scottish Government ensure that different strategies such as the National Transport Strategy, the revised NPF4 and affordable housing align?

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Place, quality and standards

#### Ideas:

(Suggestions for the future vision, themes or interventions – start, stop or modify.)

Housing discussion can often be preoccupied with discussion on numbers and the need for fast the speedy delivery required to tackle shortages of supply. It is important that we don't lose site of the importance of quality of the development that is subsequently produced or its contribution to promoting high quality, economically, socially and environmentally sustainable settlements.

Too many policy approaches and funding decisions are uncoordinated and do not take into account the impact they have on communities as well as individuals. Place based approaches can help to minimise waste, duplication and contradictions. Given this the future Scottish Government must think about how its decisions play out across places and how it can break down silo-based approaches to funding, policy and delivery. We need to ensure that we recognise the value of investing in quality placemaking.

RTPI Scotland believes that any future Scottish Government should establish a Cabinet Secretary for Places to coordinate support for cities, towns, villages and neighbourhoods. They should also be a national champion for quality placemaking. Key to this will be better aligning development plans, community plans, Single Outcome Agreements, investment plans, locality planning and infrastructure delivery.

It is important that national and local awards supported, like SQAPs and RTPI's great places.

Whether it is carried out at the pre-application stage or after an application has been lodged, Design Review Panels enables local planning authorities to ensure that developers and design teams produce high-quality, inspiring buildings and outstanding and innovative design, supports them in resisting poor design and gives them a practical means of understanding where improvements need to be made.

Early site evaluation, assessment of key policies and key development requirements critical prior to pre-application discussions.

Professionals from both the public and private sector will usually welcome timely and constructive analysis of their designs and the direction of their projects. The review process helps developers by reducing the risks and costs of delays in the planning process that can result from inadequate design quality.

Identity is needed to be created through street design, landscaping and architecture.

Scottish Government needs to take opportunities to coordinate communities' engagement in processes which shape their places and to get more people involved, for example through the Place Standard, which is proven as an effective tool for the engagement of a broad cross section of society including of seldom heard groups and young people in both community and development planning.

Connectivity for communities is important, especially by encouraging active transport.

Planners need the knowledge, skill and experience to define and control strategic infrastructure, recognise what makes an effective street composition, encourage the right mix of uses, house types and tenures and how integrates to make great places.

## **Concerns:**

Appropriate resourcing (as above) needs to be secured in LPAs to conduct Design Review Panels.

(... about current or future policy, challenges, trends.)

Questions:	
( about the	
process of	
developing	
the vision or	
route map or	
policy	
questions for	
SG to	
consider.)	

Theme:	Ageing population
THEME.	
Ideas:	Urban form is a critical consideration
(Suggestions for the future vision, themes or interventions – start, stop	Compact, medium density, mixed use and public-transport friendly settlements encourage continued physical activity, economic participation and social interaction into old age To realise these benefits, efforts are needed to make towns and cities age-friendly, including the provision of more appropriate and specialist housing.
or modify.)	Ensure that existing planning policy levers are continued
	Scottish Planning Policy states that "the planning system should identify a generous supply of land for each housing market areamaintaining at least a five year supply of effective housing land at all times". It should be informed by a robust housing need and demand assessment (HNDA). As part of the HNDA, "local authorities are required to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing. This supports independent living for elderly people and those with a disability. The HNDA should include a detailed survey and analysis of older people, their housing tenure, population projections and a breakdown of older people's disabilities.
	Relevant legislation has been introduced from the Scotland (Planning) Bill
	An amendment has be passed placing a duty on LPAs to consider how the current and future housing needs for older people and people with disabilities are to be met in and allocating sufficient sites for suitable housing.

Concerns:	New duties for Local Development Plan preparation need costed and effectively resourced
( about current or future policy,	
challenges, trends.)	
Questions:	
( about the process of developing	
the vision or route map or policy	
questions for SG to consider.)	

Theme:	Energy efficiency and climate change	
Ideas:	Energy Efficiency	
(Suggestions for the future vision, themes or interventions	Settlement patterns and urban forms that promote sustainable mobility can play a critical role in reducing emissions from the transport sector, where decarbonisation is urgently needed. Evidence shows that larger settlements, with higher densities and mixed land use, can increase levels of self-containment and reduce the need to travel by car.	
<ul><li>start, stop or modify.)</li></ul>	Studies suggest a positive correlation between higher densities and lower emissions, with medium- rise developments in existing urban areas consuming the least energy.	
	Heating and hot water for buildings made up 40% of UK energy consumption and accounted for 20% of greenhouse gas emissions. Heat networks will be a key component of reducing this area of emissions due to the costs of constructing and laying pipes and the need to balance supply and demand, urban heat networks are best suited to higher density mixed developments.	
	Climate Change	
	Medium to long-term effects of climate change will make more areas susceptible to flooding with increased severe weather events and increasing sea levels. This needs considered when developing long term housing strategies, with collaboration	

	between key agencies such as SEPA, developers, planners and local authority housing teams.  Planning and adaptation issues to be continually appraised at a regional level through strategic planning to allow for effective catchment-scale planning for flood risk and landscape-scale planning for green infrastructure. RTPI Welcomes the inclusion of statutory strategic planning in the Planning (Scotland) Bill, albeit in a new form. We believe they should place duties on planning authorities to agree strategic outcomes; to report on the strategic outcomes they have agreed including a diagram. Catchment-scale planning for floods and Green Infrastructure could be two of the outcomes contained within the report and diagram.
Concerns:	
( about current or future policy, challenges, trends.)	
Questions:	
( about the process of developing the vision or route map or policy questions for SG to consider.)	

Theme:	Regeneration and sustainable communities
Ideas:	Frontloading infrastructure (as above) is fundamental to regeneration strategies. Scottish Government needs to develop and implement innovative funding mechanisms to
(Suggestions for the future vision, themes or interventions – start, stop	support infrastructure delivery, supported by action programmes contained in development plans, focussing resources particularly to areas of low demand to enable the provision of housing in areas of need of regeneration
or modify.)	RTPI Scotland welcomes the Scottish Government's efforts to ensure that communities are more informed, and where

possible more involved, in decisions about land use, including those outwith the planning system. These efforts cut across several policy arenas, including community empowerment, regeneration, housing and planning. RTPI Scotland therefore urges the Government to consider how a holistic approach can be taken; we believe that this will allow for more efficient, and effective, implementation.

The Community Planning agenda in particular has triggered a rethink on how professionals and practitioners engage with people in talking about their places. The Place Standard tool, developed in partnership by NHS Scotland, Scottish Government and Architecture and Design Scotland, has provided a means of opening a conversation about how people feel about the places where they live and work. There is an ongoing dialogue among professionals and practitioners, including in the context of the planning review, about how community engagement should be rooted in this 'whole place' approach, instead of completed on an ad hoc basis in response to proposals for land use change as and when they are made. This means maintaining an ongoing conversation with the public about their places, with local government, agencies and relevant private sector bodies (including landowners) then taking responsibility for implementing the actions for which a need has been identified.

There is consensus among Scottish Government and most other planning and land use stakeholders, including RTPI Scotland, that decisions on key issues in planning should take place earlier in the process, during the development planning phase instead of the development management phase. This would introduce greater certainty to the system, for public and private sector stakeholders as well as communities. An improved final version of this guidance could prove useful in this context, and it could encourage landowners to consult with communities about possible plans for land use change or development before the statutory requirement to do so as part of the formal planning process is arrived at.

#### Concerns:

(... about current or future policy, challenges, trends.)

In the discussion paper it mentions (S13) "For the purpose of these discussions, the housing system includes [...]planning and infrastructure delivery, insofar as it directly relates to housing; and the interface with other policy areas such as economy, health, social care and environment." RTPI Scotland believes that a planning system, if used to its full potential, acts as the interface between housing, economy, health, social care and environment.

Third Party Rights of Appeal – whilst this amendment was voted down at the Stage 2 of parliamentary scrutiny, due to the close voting it will likely be discussed again at Stage 3. RTPI

does not with the introduction of the Third Party Right of Appeal due to several issues:

- It will lead to more local decisions being made by government at a time when we want to give communities more say over the places where they live.
- It will open the door for competing commercial interests to frustrate development, including much needed housing, and potentially to pit one part of a community against another.
- It will clog up the planning system at a time when planning departments are under severe resourcing pressures.
- It will undermine democratically elected planning authorities' responsibility to ensure planning decisions are taken locally in the public interest.
- It will weaken constructive early engagement.
- It will further widen inequality in our communities by disproportionally favouring those with the capacity, time and resources to pursue an appeal.
- It could mean that seldom-heard voices in the planning system may be further marginalised. The signatories are also firmly of the view that 'equalising' appeal rights by removing or reducing the current applicant right of appeal would be a mistake.

### Questions:

(... about the process of developing the vision or route map or policy questions for SG to consider.)

How can we enhance communities engagement with the planning system? It could be by strengthening Local Place Plans through legislation and subsequent guidance, improving advice and legislation; supporting and communicating a more frontloaded approach to engagement; committing resource essential to the delivery and support of community engagement activities including LPPs.

#### **ENDS**