

# Response ID ANON-KZHS-ZCNV-1

Submitted to **Housing to 2040: consultation on outline policy options**

Submitted on **2020-02-28 16:33:27**

## Questions

### 1 Do you have any comments on the draft vision and principles?

**Please be specific and identify what you would change and why.:**

RTPI Scotland broadly supports the draft vision and principles. The Institute is particularly encouraged to see the focus on sustainable communities, and acknowledgement of the importance of existing housing and communities. Delivering new housing in sustainable communities, and retrofitting existing communities, will require collaborative working including with planners across the public and private sectors.

### 2 Do you have any comments on the scenarios and resilience of the route map or constraints?

**Do you have any comments on the scenarios and resilience of the route map or constraints?:**

No comment.

**For questions 3 to 7 below, when making proposals, please be as specific as you can about:**

### 3 Do you have any proposals that would increase the affordability of housing in the future?

**Do you have any proposals that would increase the affordability of housing in the future?:**

We need to be clear on who pays for infrastructure and what constitutes effective land 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 the Scottish Government must take a more active role to increase the number of quality homes built through:

- prioritising its Capital Borrowing Powers to fund housing and infrastructure
- establishing a body or number of special purpose vehicles to work with local partners to coordinate and front load infrastructure, deliver development and assemble land across Scotland
- 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.
- strategic allocations need to be tied in with Scottish Government's Infrastructure Investment Plan.

Long-term development of Scotland's transport infrastructure cannot be viewed in isolation from related land use planning consideration. It is crucial to align transport infrastructure and housing delivery more effectively.

It is important to invest in the next generation of those who will make housing happen, including planners. Local authority planning departments have suffered disproportionately from funding cuts since 2010, with on average 30% of departmental budgets lost, and 25% of staff.

Incentives should be created for developers to deliver on smaller parcels of land allocated in local development plans. 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.

### 4 Do you have any proposals that would increase the accessibility and/or functionality of existing and new housing (for example, for older and disabled people)?

**Do you have any proposals that would increase the affordability of housing in the future?:**

Urban form is a critical consideration: 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.

Ensure that existing planning policy levers are made best use of: Scottish Planning Policy states that "the planning system should identify a generous supply of land for each housing market area...maintaining 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.

### 5 Do you have any proposals that would help us respond to the global climate emergency by increasing the energy efficiency and warmth and lowering the carbon emissions of existing and new housing?

**Do you have any proposals that would help us respond to the global climate emergency by increasing the energy efficiency and warmth and lowering the carbon emissions of existing and new housing?:**

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.

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.

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 to be 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 should 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. Regional Spatial Strategies, introduced through the Planning (Scotland) Act 2019 will be an important tool for this, and highlight the importance of strong strategic planning.

**6 Do you have any proposals that would improve the quality, standards and state of repair of existing and new housing?**

**Do you have any proposals that would improve the quality, standards and state of repair of existing and new housing?:**

No comment.

**7 Do you have any proposals that would improve the space around our homes and promote connected places and vibrant communities?**

**Do you have any proposals that would improve the space around our homes and promote connected places and vibrant communities?:**

Housing discussion can often be preoccupied with discussion on numbers and the need for speedy delivery that tackles shortages of supply. It is important that we don't lose sight of the importance of quality of development and 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. The Place Principle provides a welcome focus on breaking down silo working, which RTPi Scotland believes could make a significant contribution to better placemaking. The Institute believes that planning and placemaking should be viewed as 'preventative spend': Upfront investment in places that ultimately deliver better outcomes for public health and wellbeing, the environment and the economy. A tangible outcome from a place based approach would be close alignment of development plans, community plans, Single Outcome Agreements, investment plans, locality planning and infrastructure delivery.

Whether it is carried out at the pre-application stage or after an application has been lodged, Design Review Panels enable 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.

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.

Planning needs to be involved with corporate decision making in local authorities to ensure joined up strategies and investment plans to deliver more housing. For example tying in educational catchment planning with developer contribution towards education resulting from new developments. RTPi Scotland welcomes the provision for mandatory Chief Planning Officers in local authorities included in the Planning (Scotland) Act 2019. The Institute looks forward to working with Scottish Government on drafting guidance for this provision.

**8 Any other comments?**

**Any other comments?:**

No comment.

**About you**

**What is your name?**

**Name:**

Kate Houghton

**What is your email address?**

**Email:**

kate.houghton@rtpi.org.uk

**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

**Organisation:**

RTPI Scotland

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response with name

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

**Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Very satisfied

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Very satisfied

**Please enter comments here.:**