

## **HOPS response to Draft Planning Delivery Note: Housing and Infrastructure**

The publication of the delivery note is welcomed as it provides clarity and addresses issues that currently arise within the existing Scottish Government advice on housing and infrastructure. Further comments are provided on areas that raise cause for concern or require further clarification.

### **Development plans that Deliver**

- Focusing of resources and time at the beginning of the plan process is welcomed. This will provide cost / benefits for both the decision making process undertaken by Development Management and will allow for developers to become more risk aware at an early stage of development.
- The emphasis on regular stakeholder engagement and the promotion of the use of the Place Standards Tool is welcomed.
- Figure 1 welcomed but it should reflect the need to undertake the HNDA at the SDP stage within city regions. As a result within these geographical areas the “establishing the infrastructure evidence base” is more likely to take place at the LDP stage of the process.

### **Planning to Deliver Homes**

- The need to consider housing and infrastructure in closer alignment to develop evidence of when a site is effective and therefore should be included in the plan is welcomed. We note that it is recommended that the 5 year effective land supply that should be shown in the plan. Tied into the action Programme this should mean that the focus will be on a proactive approach identifying infrastructure projects that can unlock and deliver housing on specific strategic sites.
- The guidance on inclusion of a ‘flexibility policy’ should be clear that it would apply where the land supply has fallen below the figure set out originally in the Plan, not when completion levels fall. This would be consistent with the advice about the likely pace and scale of delivery.
- Strongly welcome the removal of marketability from the criteria of an effective site. Marketability has often been used to restrict the amount of land that is deemed to be effective by the developer and has been a real issue.
- Welcome the clear statement recognising regeneration and setting brownfield development ahead of Greenfield and the role that planning can play in directing the right development to the right place at the right time.
- Note that the control of Build to rent will be difficult as it is not currently in a separate use class. This would be better dealt with in a change to the Use Classes Order where an update could provide clarification on the statutory definition of different residential types.
- Note that build to rent contributes to the private sector housing requirement.

### **Planning for Infrastructure**

- Welcome the proposal that infrastructure planning should be integral to the plan preparation process.
- The draft advice sets out a clear path for identifying the infrastructure requirements, starting at the call for sites stage and leading through to a clear delivery mechanism within the action programme. This is welcomed.
- The draft guidance sets out a large number of tasks for plan preparation and implementation. Training and peer education would be welcome in this area so that best practice can be shared and data gathering is not duplicated.

- Identification of infrastructure costs is time consuming and resource intensive. Note that the government sees this as a positive way to increase certainty for all parties and notes that it will assist with future masterplanning and development management timescales. Prioritising is essential and a proportionate approach requires to be taken. All of this detail should sit within the action programme where it can be reviewed and updated. The development plan should provide clarity of the infrastructure required but the detail should sit within the action programme.
- Welcome the support for the action programme as a “live” document that requires continuous engagement with key stakeholders and that collective working is to be encourage.
- Welcome the support for standardising the information required for action programmes with the inclusion of guidance in appendix 3.

### **General Comments**

- Planning of itself cannot increase the delivery of new housing, and this should be clearly acknowledged. Whilst establishing a better evidence base for infrastructure needs, costings and funding is good practice, it will not of itself ensure development takes place. It is less imperative in areas where there is limited development pressure and the emphasis is on the regeneration of vacant and derelict urban land. More emphasis on achieving development under these conditions would be welcome, for example on issues relating to decontamination and supporting the market.
- In addition, the guidance will require significant liaison, consultation and influence to be exerted over a variety of external stakeholders, over which planning services may have little control. It may also require a greater corporate awareness of the importance of development planning within local authorities. Government involvement in publicising planning’s new coordinating role in this exercise would be welcome.