

Response ID ANON-KZHS-ZCM9-3

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

Submitted on **2020-02-27 16:04:19**

Questions

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

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

Vision: Broadly supported.

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

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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?

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Affordable Housing and Quota policies:

Such policies should be applied nationally, with the onus on the developer to justify any opt out, based on a clear national guidance. This applies to affordable housing and also to the requirement for targets for wheelchair accessible housing for which the preference is for the use of building standards. The drain on resources in planning services negotiating such policies, and the delays that this causes to planning permissions, can be significant and clearer national prescription and regulation, would help reduce this.

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?:

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?

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

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

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8 Any other comments?

Any other comments?:

Clarifying Roles

In advance of this response, it was thought useful to clarify the role of planning authorities which is sometimes misunderstood or misrepresented. The Planning Authority Role in delivering housing is generally as follows:

- making land available for housing development through the development plan process, through the granting of planning permission, and potentially through land assembly;
- Preparation of Development Briefs and/or masterplans;
- Determining Planning Applications;
- In making such determinations, applying conditions to development proposals; negotiating ameliorative measures to improve the quality, attractiveness and suitability of the development proposal; and negotiating development contributions including affordable housing contributions;
- Negotiating Section 75 Agreements which can cover matters such as the phasing and timing of development.

Resources

In common with other public sector services, planning services have experienced a depletion in resources. For this and other practical reasons, policy ambitions should be framed in recognition of the most expedient way of achieving outcomes. The following comments around Standards, Permitted development and quota policies apply in this regard.

Standards

Support is offered to measures to introduce consistent regulation through building standards, rather than planning, to ensure that buildings are constructed to the required standards in respect of matters including internal and external space standards, renewable energy and energy efficiency. This would help address significant issues around climate change and the need for life long adaptable housing to accommodate the ageing population.

It is estimated that 80% of housing stock standing today will still be standing in 2050. Therefore Consideration must be given to effective regulatory measures combined with appropriate incentives through grants and loans, to improve the existing stock.

Permitted Development

Support and clarifications around the detailed nature of permitted development should be provided nationally to ensure that agendas including renewable energy, energy efficiency and space standards are applied consistently.

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Such policies should be applied nationally, with the onus on the developer to justify any opt out, based on a clear national guidance. This applies to affordable housing and also to the requirement for targets for wheelchair accessible housing for which the preference is for the use of building standards. The drain on resources in planning services negotiating such policies, and the delays that this causes to planning permissions, can be significant and clearer national prescription and regulation, would help reduce this.

Corporate Responsibility for Housing

Housing is such a fundamental issue that it should be regarded cross departmentally and at the highest level within local authority corporate structures. Annual cross departmental reporting is recommended to ensure that corporate understanding and responsibility is taken for housing issues. In particular reporting should be conjoined across housing, planning and social and health care partnerships to cross departmental understanding of the issues and policy responses.

In practical terms this should take the form of:

- conjoined annual reporting on local housing strategies and local development plans; and
- corporate responsibility and awareness of housing delivery in relation to any Targets.

Housing Targets

Planning and housing policy around targets and housing numbers requires to be reviewed, clarified and simplified. HoPS is happy to offer further advice to offer in this respect and will be engaging through the development of NPF4, incorporating Scottish Planning Policy, in this regard.

Infrastructure and place making

Freeing up resources in planning processes by clarifying and simplifying planning policy, and the move to ten year LDPS, should enable the focus of planning activity to move more fully towards, placemaking and the coordination of infrastructure delivery. This should be supported through government supported training and leadership.

Urban Regeneration

More coherence is required around land assembly and fiscal measures to support urban regeneration. Measures are required to support the delivery of blighted sites where viability is marginal and in particular to support the delivery of flats where the market sector has in some locations, disappeared.

https://www.ros.gov.uk/__data/assets/pdf_file/0017/123830/Calendar-Year-Residential-Market-Review-2018-v3.pdf (Table 12)

Special Purpose Vehicles

There are many good examples of the use of special purpose vehicles to address housing and regeneration challenges including for example, Clyde Gateway and Transforming Communities Glasgow . TCG is regeneration company established to oversee the delivery of regeneration and development programmes across eight identified Transformational Regeneration Areas (TRAs) in the Glasgow.

About you

What is your name?

Name:

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What is your email address?

Email:

susan.rintoul@improvementservice.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Heads of Planning Scotland

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

Publish response only (without 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?:

Please enter comments here.:

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

Please enter comments here.: