
Response to NPF4 Housing Technical Discussion Paper

Introduction

- As part of the development of NPF4, which will become the National Development Plan for Scotland including Scottish planning policy, a **NPF4 Housing Technical Discussion Paper** was published on 3rd March. Comments are to be submitted by 31st March. There are also three “*Background information notes on SPP policies*” on:
 - Housing General
 - Housing Specialist, and
 - Housing Affordable.
- Considerable feedback has been provided from Heads of Planning Scotland (HoPS) members and the attached response provides some high-level messages, along with some detailed commentary. I note that a number of the authorities will be submitting individual responses where points of detail can be raised.

Recommendation

- The following forms a suggested response on a number of matters important to HoPS. Comments are welcome **ASAP** to enable the response to be finalised for the 31st March deadline.

Suggested Response

- HoPS is the representative organisation for senior planning officers from Scotland’s local authorities, national park authorities and strategic development planning authorities.

The purpose of HoPS is to:

- i. Promote the profile of public sector land use planning
 - ii. Support and promote excellence in planning leadership
 - iii. Ensure the delivery of a culture of continuous improvement in planning authorities, and
 - iv. Provide advocacy and coordination to ensure that planning authorities are properly resourced to deliver quality outcomes.
- HoPS would like to thank the Government for the opportunity to comment on this Discussion Paper and as the representative body for public sector planning in Scotland, and also as key practitioners who will be delivering planning reform, HoPS would like to further support the development of the policy and guidance context for planning for housing through a collaborative working relationship with our colleagues in Scottish Government and wider stakeholders.
 - Firstly, HoPS would like to make some overarching initial comments.

- Planning's role in relation to housing, delivery and infrastructure was key business identified as part of planning reform and in a number of respects that role, still requires to be better defined. Bringing clarity to the role will help all involved in the delivery arena, to identify where impact can be achieved. To not define the role, can result in a misdiagnosis of the issues and the wrong or ineffectual activity. In that respect whilst the Draft Delivery Advice attempted to clarify the calculation of Housing Supply Targets, there is widespread agreement that the time and effort spent on agreeing such matters, is often an ineffectual use planning resources. Attempts to bring clarity to such matters are of course supported, but HoPS would like to move the debate more fully onto the role of planning in supporting development delivery and the creation of great places.
- In relation to the planning system's influence on housing and delivery, if we continue on the premise that the planning system is either a direct barrier to, or a direct enabler of housing delivery, then we are in danger collectively of misdiagnosing the issues and their solutions. This is recognised in the Government Background Information Note on "Enabling Delivery of New Homes", which states that:

*"Completion rates have risen and fallen in line with the economy and wider social and housing policy changes including national targets for the delivery of affordable homes. Planning policy relating to housing has evolved, **but there is no definitive evidence establishing a causal link between national planning policy and completion rates.**"*
- *Private* housing delivery, (whether a site is developed and the rate at which it is delivered), is influenced by drivers beyond the availability of consented land and outwith the planning powers of the Local Authority.. Also, the periods when the highest increases in housing delivery have occurred, have been when Governments have intervened and invested in *public* sector housing. The recognition of this distinction in influence between the private and public sector and the role of planning, is important to enable policy makers to focus on the correct enabling activities.
- A further fundamental issue that we would wish to raise, is a rationale (set out in the attached HoPS Discussion Paper), for moving away from a Targets based system. The attached discussion paper sets out an outline of a potential process based on evidence, understanding, and judgements, that could move planning considerations away from a system that implies a level of arithmetic and scientific rigour that simply does not apply, towards a more informed and rational approach to planning for housing and communities.
- HoPS thinking, including in relation to the roles of different actors within the delivery pipeline, is set out in an internal discussion paper which is now attached as an Appendix to this response and commended to the Government and wider stakeholders for consideration.
- HoPS would now like to offer the following comments on the consultation questions noting that individual authorities will be responding separately.

Question 1: What is your view on the guiding principles set out in the Technical Paper?

- Set out in the Table below.

Bullet 1	the approach to setting national housing land figures is intended to provide early clarity and to reduce conflict and complexity in the local development plan process.
<p>The principle that these matters can potentially be agreed at NPF stage thereby reducing conflict and complexity, is strongly supported. The now withdrawn Draft Planning Advice Note on Housing and Infrastructure attempted to provide clarity on the calculation of housing land, however the resulting inconsistent LDP Examinations, appeal decisions, and lack of certainty for communities, has reflected poorly on the national planning system and more generally on our profession. It is imperative that these matters are now resolved within NPF4 or otherwise, and HoPS are highly motivated to see that happen.</p> <p>However, the practice may be more challenging and the process for establishing housing Targets as laid out in the paper may introduce more opportunities for conflict in the process if not managed with clarity. A number of issues are identified in order that the new system can avoid the pitfalls of previous approaches or introduce new ones.</p> <p>Agreeing “national housing land figures” within NPF4 will likely require LDPs and LHSs to synchronise under the NPF4 timetable which has proved difficult to achieve previously. These matters might be opened up again for discussion at the Gatecheck and Examination stages especially if that scrutiny stage comes some time after NPF4, which seems likely to happen. Therefore, a mechanism will be required to encourage or require LDPs and LHSs to align shortly after NPF4 preparation.</p> <p>Clarity on what will be examined at Gatecheck and at the ‘Examination phase’ may help reduce the potential for a double examination of housing numbers. If this can not be avoided, there will be little merit in the upstream agreement of numbers within NPF4 as proposed.</p> <p>Also if alignment of LDPs and LHSs is achieved, this will have consequential resource implications for the DPEA which will also require consideration.</p>	
Bullet 2	the purpose of the figures is to ensure that local development plans allocate sufficient land for housing. We propose that the figures in NPF4 are expressed as minimum figures for housing land to accommodate an agreed projected number of homes.
<p>Clarity will be required as to whether we are referring to an estimate of land in hectares or in unit numbers.</p> <p>Minimum Figures for housing are inappropriate in areas of high market and commercial demand where some planning restraint is required.</p> <p>Also, there has to be a mechanism which establishes what a maximum figure would be as if there is no upper limit, then this may lead to other pressures, such as on infrastructure provision, environmental limits and capacity of public services to cope, which also need to be factored in.</p>	

Without being tight on the definitions, as discussed throughout this response, there will be inconsistencies and potential challenges on the wording that has plagued the current system. It may be that terminology needs to move away from the term ‘minimum’ and replace it with something more straightforward i.e. this is the number of houses required.

Bullet 3	an agreed proportion of this land should be ‘deliverable’ whilst the remainder should reflect the longer term spatial strategy for the area. The policy and / or guidance could provide clarity on what is expected to be deliverable land, as well as addressing longer term strategy
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Careful attention must be paid to both existing and any new terminology introduced, and its application. It is not clear what is meant by the term “agreed proportion” or “deliverable” and any new terminology will require precise definition.

It seems from the Paper that the term “deliverable” is being used instead of the current term, “effective supply”. The suggestion would be that rather than introduce new terminology that *programming* within the *housing land audit* is used. The preference would be to remove the term “effective supply”, relying instead on the *programming* and to avoid introducing new terms.

One of the issues/debates within the current system, is that programming, whilst based on experience and evidence of what has gone before, is nevertheless largely subjective and is dependent on the industry delivering those units. Therefore, whatever the new terminology is, there has to be a requirement on the industry to deliver these ‘agreed numbers of private housing’.

All land is deliverable given the right circumstances. In some locations almost no land is deliverable due to market circumstances (if there are no buyers there will be no builders) whilst in other areas almost all land is deliverable because of market confidence and the availability of buyers. Given these circumstances, the planning system’s influence on delivery within the private sector is in some circumstances, limited and careful interpretation of the term “deliverable” will be required.

Undertaken within a context whereby roles and responsibilities are understood (see Appendix Report), clarity around the role and purpose of the LDP in making land available, accompanied by local authority monitoring of delivery and identification of any required delivery support interventions, must be key tenets of any approach.

Bullet 4	in terms of geography and scale, we propose that the minimum figures should be set for all local authority areas in Scotland . This would maximise consistency and simplicity in the planning system as a whole and remove the uncertainty that could arise if, for example, figures at a regional scale required further calculations to set out local contributions to a shared figure. Within this, however, we recognise that there is a need to allow for local flexibility that reflects local circumstances. This could still be achieved as the figures are taken forward in each local development plan.
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As above, in some areas of high commercial and market demand where the required planning intervention is restraint, a minimum housing land figure is inappropriate. Conversely in some areas of low demand, the concept of minimum will have little or no impact.

Local Authorities should be involved directly in the determination of any levels of flexibility to establish the minimum housing land figures and to work jointly with the NPF4 processes.

Within the *private* sector, functional housing market areas better reflect how those seeking a new home, search and meet their housing demand. For the social sector the appropriate geography is the local authority. It is particularly important to ensure that these distinctions are reflected within Scotland's city regions and a stage must be retained within the process to ensure that this can happen. Regional spatial strategy boundaries may not be appropriate for every authority to address housing issues. As a basic whatever is produced should be available at a local authority level.

Important distinctions in how each tenure operates (private and social), require to be reflected in future national policy and guidance.

Bullet 5	a national approach needs to be informed by regional and local knowledge, analysis and input. We therefore propose to define the requirements for land in each area by working with local and planning authorities individually and / or in regional collaborations to ensure national analysis is informed by local objectives.
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The principle of an approach based on regional and local knowledge is supported.

However, if proceeding as suggested in the paper in defining housing land targets for all local development plan areas, the Government involvement working with planning authorities individually and in regional collaborations, will be a resource intensive undertaking which will require clear timetabling.

The mooted approach suggests Government and parliamentary involvement with respect to a matter that has previously been the preserve of the local authorities and therefore this issue may require to be considered by local authority representative bodies such as SOLACE and COSLA.

Whilst HoPS has continued to develop a productive working relationship with HfS, the implied enhanced status of their role which seems to amount to a veto, in agreeing the scenarios and assumptions and any potential approach to functional market areas, could not be supported.

Question 2 Should NPF contain housing land figures for all areas in Scotland or focus on certain areas?

- There are significant distinctions in the role and purpose of a Target between: rural and urban; areas of growth and decline; areas of high demand and low demand; and particularly between the role of Targets in the public and the private sector. The local authorities and regional housing market partnerships are best placed to comment, and their views will help inform this issue.
- Given comments made previously and within the attached Appendix, particularly around the role of different actors and their influence on delivery, HoPS would like to emphasise the effective role of national targets in the public sector where when combined with funding, the influence of local authorities in delivery is significant. Specifically, the More Homes Scotland policy initiative, provided a statement of national ambition and funding that has enabled local authorities and RSLs to scale up public sector delivery accordingly. This is a clear example of an effective Target based approach where local authorities have a high degree of influence.
- National Targets could also be set for other national policy issues including:
 - i. affordable housing;
 - ii. housing for older people and wheelchair users; (an all tenure target for wheelchair accessible housing (15%) is already a requirement for LHS's however it is going to be difficult to achieve and there is no mechanism to require the private sector to deliver this type of housing. This is considered to be additional to affordable housing requirements.)Gypsy Travellers where National Targets could usefully be set based on a national view of need;
 - iii. the energy efficiency rating of new and existing stock; and
 - iv. the self-build and build for rent sector.

Question 3 Are there areas in Scotland where an alternative approach may be more appropriate?

- Refer to Question 2.

Question 3 Are there areas in Scotland where an alternative approach may be more appropriate?

- Whilst the HoPS Discussion Paper at the Appendix proposes a potential approach which would move away from a Target based system, we offer the following comments.
- Firstly this is an example of where a clarity in terminology is required with the Act referring to "Targets" and the question referring to "Requirements". Overall and as per our response on Guiding Principle 1, HoPS supports the aspiration to reduce debate and streamline planning for housing to allow planning authorities to focus on delivery related activities and the creation of quality places. Critical to achieving this, will be the need for LDPs and LHSs to synchronise and a mechanism for achieving that may be required. The role of the HNDA and the policy interpretation of HNDA Housing Estimates (Stage 1 and Stage 2), into Targets, will require to be factored into the inclusion of locally agreed Targets within NPF4 which could be challenging.

- Setting requirements for housing land based upon stage 1 and 2 of the HNDA potentially removes the requirement from current Scottish Planning Policy to be to take account of wider economic factors such as capacity, resource and deliverability and implies little consideration of the tenure and deliverability of homes. It also does not factor in that future demand can be met from conversions and bringing empty properties back into use, If close alignment between NPF4 and LDPS and LHSs is not achieved these matters are likely to be opened up again for discussion at the Gatecheck and Examination stages especially if those scrutiny stages comes some time after NPF4.
- It may be that what is intended is a focussed exercise to derive locally agreed Targets for inclusion in NPF4 within a short timeframe and a process around how this is to be achieved will require to be set out in policy and guidance.
- In addition, the NPF timetable must ensure adequate processes to factor in stakeholder engagement with communities and their representatives (including Community Councillors, Councils, MSPs) to ensure an understanding of NPF and to build trust in the planning system.

Question 5 Should NPF provide a single housing land figure or a range?

- Whilst the HoPS Discussion Paper at the Appendix proposes a potential approach which would move away from a Target based system, To deliver the aspiration of reduced debate and more delivery focus, a single figure based on local knowledge and agreed with LA's and HMP's would seem the logical preference.

Question 6 Is the HNDA Tool an appropriate mechanism to base housing land figures on?

- Whilst the HoPS Discussion Paper at the Appendix proposes a potential approach which would move away from a Target based system, we offer the following comments.
- Some form of assessment of housing need and demand in the future is essential. In common with all models, the HNDA Tool is an imperfect but consistent method of tenuring the NRS Household Projections and given that there is now familiarity with its use, it has a role to play in the estimation process. Outputs provide a starting point only and further work is required to translate the Housing Estimates that are output from the Tool, into a policy view of Housing Targets.
- The HNDA process has brought added value to the collective understanding of housing systems between housing and planning professionals working within Housing Market Partnerships and this should not be lost within any new system of planning for housing. On this latter issue, HoPS would encourage a significantly more joined up national and local government approach to planning for housing and would suggest that the views of ALACHO should be captured within the new system under development.

- However, stages 1 and 2 of the HNDA tool are simply demographic projections of household change, adjusted to account for currently homeless households. There are many other considerations to take account of before allocating land. It is essential that account is taken of the types and tenures of houses needed before land requirements are set. The deliverability, infrastructure and resource requirements for the needed houses must also be considered alongside demographic need.
- Scottish Planning Policy requires LDP's and LHS's to be aligned as much as possible and therefore the changes under discussion require to be considered in the context of provisions for LHSs.

Question 7 Should there be scope for local and planning authorities working together to reflect functional housing market areas that cross local authority boundaries? What approaches could be used to achieve this?

- Whilst the HoPS Discussion Paper at the Appendix proposes a potential approach which would move away from a Target based system, we offer the following comments.
- As per the previous response, the HNDA process has brought added value to the collective understanding of housing systems between housing and planning professionals working within Housing Market Partnerships which reflect functional housing market areas. The principle that the private sector element of housing demand arises and is met within functional market areas is enshrined in planning policy and should not be lost. The NPF process must allow sufficient time to allow cross-boundary analysis to be conducted and agreed by each authority working within Housing Market Partnerships.
- It will be challenging to factor into the NPF4 processes the time that will be required to establish Targets at functional market area. Mechanisms available include the Regional Spatial Strategies; Evidence Reports of each authority, Local Housing Strategies; and, the "Beyond the HNDA" reports as currently detailed in HNDA Managers Guidance. Whatever processes are introduced will require to be sufficiently streamlined to align with the NPF4 timetable and allow for consultation with wider stakeholders.
- However whilst enshrined in policy, the role of functional market areas considerations within decision making within LDP Examinations and planning decisions, requires clarification. In practice planning decisions focus on the local authority geography and generally ignore the functional markets area geography.
- The suggestion within the SG Discussion Paper at 1.3,3 to incorporate adjustments for Functional Market Areas is welcomed, however clarity requires to be developed to address decision making at functional market area. The important additional element of any such approach will be how delivery and supply are monitored at functional market area geography and then how such information is utilised within decision making. A national housing land audit on a digital platform will assist in that regard. (See Question 11)

Question 8 Should NPF apply a level of flexibility to the HNDA tool results to ensure a proactive approach to managing the supply of land for housing in a positive way? Should the level of flexibility be informed by recent housing completions?

- Further clarity is required on what is meant by the term 'flexibility' and how it is intended to be applied. The HNDA tool results produce *Housing Estimates* which under current policy and guidance require to be translated into *Housing Supply Targets* to which *Generosity* is applied to achieve the *Housing Land Requirements* for LDPS.
- Assuming that *flexibility* is the same as *generosity*, the principle that the application of *generosity* to the Housing Supply Targets, achieves the required level of delivery is currently asserted in policy, but, as per the Scottish Government statement in the Housing General Note, the causal link between policy and delivery is unproven.
- In general if the aim is to develop a system of planning for the housing numbers that is simpler and removes debate, then consideration should be given to developing a single agreed number based on the local knowledge and circumstances. Flexibility can and will be included in that locally agreed single number, but given that a formulaic approach to flexibility and the link to delivery is unproven, and the overarching aim to simplify, consideration and caution is advised in adopting any such approach.
- A specific flexibility target should not be set within NPF 4, as this may be impossible to achieve for many local authorities and is unlikely to take into account local knowledge of the housing market and requirements.
- At a local level, setting flexibility using average completions would be a more realistic way of ensuring there is sufficient housing land available to meet likely demand. An approach based on past completions will also be able to reflect variations in delivery at market area geography and by tenure. In arriving at a locally agreed view, consideration could be given to completions using measures including for example an average of a five year period or ten year period.

Question 9 Should NPF housing land figures be met in LDPs as a minimum?

- In order to attain the simplicity sought, consideration should be given to removing the scope for minimums, flexibility and debate whilst taking a simpler approach based on locally agreed knowledge and understanding that that reduces debate.
- In some areas of high commercial and market demand where the required planning intervention is restraint, a minimum housing land figure is inappropriate. Conversely in some areas of low demand, the concept of minimum is meaningless.

Question 10 LDPs are moving to a ten year timeframe. Housing land audits generally programme land supply for a five year period. For LDPs to have a ten year land supply available upon adoption what mechanisms could be used to ensure land is brought forward in accordance with the LDPs spatial strategy?

- LDPS are to become longer term, focusing on spatial strategies and the needs of places and communities and this is supported. Alignment of LDPs and LHSs should be encouraged and housing strategy should be given corporate importance within local authorities.
- Whilst it is acknowledged that Housing Land Audits are imperfect and based on both evidence and judgements about delivery, they should be programmed for at least a ten year period and should be used to monitor delivery. This should include monitoring of past completions and annual monitoring of the delivery pipeline which again should be regarded as important local authority business informing other capital investment decisions.
- LDP's could set out policies within their plans to ensure how the land supply will be managed over the 10 year period and what will trigger a review.
- Annual monitoring and review along with a refresh of housing need and demand through the LHS, can be utilised to establish if more land requires to be brought forward. This also therefore requires consideration of a trigger or LDP review if required.

Question 11 Should the Scottish Government play a role in the housing land audit process?

- There is a significant amount of time consuming and unnecessary debate around what is primarily a technical exercise undertaken by the local authorities. The provision of clear and consistent Government guidance combined with the presentation of housing land on a digital national platform, is supported and encouraged. The Digital Taskforce provides an opportunity to develop a digital platform that could provide clarity and reduce unnecessary debate. Similarly the PPF returns can provide a useful source.
- This will bring clarity to both Local Authorities and the Industry and how it should be undertaken. This is required as there have been recent appeals which have different interpretations on housing land audits and how they should be undertaken.
- The housing land audit is the tool used to monitor the availability of land for housing (an input) and the number of homes completed (an output) against housing land requirements and housing supply targets. There is currently confusion as to how land availability and delivery of homes are measured. It is common for land supply (input) to be measured in terms of the programme of completions for the next five years (output). The report of the Independent Review of the Planning System in 2016 highlighted the impact of the confusion around measurement and definition of 'effective' housing land. Its Recommendation 13 stated an urgent need to establish a clearer definition, to allow energies to be focused on other, more important things. This issue remains a key piece of unfinished business from the independent review. NPF 4 is an opportunity to set out a clearer policy context for how housing land and housing delivery are measured and dealt with.

- This latter point relates to the opening comments in this submission around the role of planning, with development planning and development management having a significant role in making land available for housing development, but a more limited role in securing the delivery of land or influencing the rate of its delivery. HoPS mission is to bring more collective focus and understanding to the issues to enable practitioners to use limited resources more effectively and to develop their role to contribute to the delivery of great places for communities.

**Creating Great Places for People
HoPS Recommendations on Planning for Housing**

Executive Summary

1 Introduction

- 1.1 HoPS is concerned that the debate around the housing numbers, has become resource consuming to the extent that it detracts from the ability of Local Authorities and planning, to focus on the creation of great places for people through a delivery and infrastructure focus and better design outcomes.
- 1.2 We now have the Planning Act 2019 although much still requires to be clarified around the policy context for planning for housing including the role of the NPF in setting “targets for the use of land in different areas of Scotland”.
- 1.3 This report has been developed based upon discussions within the HoPS Development Plans subgroup over the last couple of years which provide the rationale for the recommendations in this report. The broad principles of a potential approach are set out, the details of which will require to be further developed. It is suggested that to do this fully, that this report and the recommendations should be used as a basis for discussion with Scottish Government and wider stakeholders.

2 Key Principles

- 2.1 The key principles behind the following recommendations include:
 - clarification of delivery roles between the public and private sector;
 - simplicity and clarity in the terminology utilised;
 - reduction in the number of terms with a focus on delivery of Targets;
 - fuller engagement between housing and planning professionals;
 - provision of fuller information at Evidence Report stage of the LDP; and,
 - corporate responsibility for housing Targets and delivery.

3 Recommendations

3.1 The recommendations are set out below.

R1	Language to be amended in Scottish Government policy to reflect roles
R2	<p>The terms <i>5 year effective land supply</i> and <i>established land supply</i> should be deleted and replaced by terms which describes better the planning authority role in making land available for housing development as set out below:</p> <ul style="list-style-type: none"> • <i>Total Available Land: this is the total amount of land available for housing as identified in a Housing Land Audit.</i> • <i>Total Unconstrained Available Land: This is the total capacity of the land available for development where there are no constraints and a start could be made</i> • <i>Programming: This is the programming of All sites to at least year 10.</i>
R3	The above terms to be accompanied by a diagrammatic of the development pipeline
R4	Priority to be given to the development of Housing Land Audit information on a digital national platform
R5	HNDA to be retained
R6	As per the HNDA Manager’s Guidance, housing and planning colleagues to prepare a bridging report (“Housing Policy Considerations and Housing Targets”), that is considered by the Council’s management team and Cabinet, identifying what the HNDA means for Housing Targets, as well as housing policy and planning policy within the LHS and LDP.
R7	Policy and Guidance to reflect that housing monitoring and delivery is a matter of corporate responsibility within Local Authorities that should be considered at least annually by the Chief Executive, corporate management team and elected members
R8	To reflect the above, Scottish Government LHS, HNDA and development plan guidance on housing to be conjoined.
R9	Ten year Targets to be agreed at corporate management team and cabinet level and reported on annually in the Annual Monitoring and Delivery Programme. This would be the annual Housing Land Audit, with all sites programmed out at least to year 10, along with a commentary on delivery activities and the wider context and importantly recommended activities to meet Targets.
R10	LDPs to make sufficient land available to achieve delivery of the Targets using an based on the need and demand for new housing (HNDA), the Targets to be achieved over the ten year period of the Plan, along with an assessment of the potential for growth of settlements influenced by the SEA/Site Evaluation framework
R11	The spatial approach of the Plan in making sufficient land available to meet the Targets, will be tested at Evidence Report stage and subsequently monitored annually by the authority.
R12	A simplification of the terminology including removal of the terms “Generosity” and “Requirements” alongside retention of the term “Targets” to sharpen the focus on delivery.

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R13	<p>Formulaic calculations to be removed in place of the Reporter’s assessment at Evidence Report stage. Material considerations of this assessment will include:</p> <ul style="list-style-type: none"> • Relevant Local Authority strategies e.g. housing and economic strategies; • HNDA; • “Housing Policy Considerations and Housing Targets” report; • corporate management team agreement of Targets; • Local Development Plan itself and its spatial development strategy; • SEA/Site Evaluation framework; and, • Annual Monitoring and Delivery Programme (which includes the Housing Land Audit programmed to at least year 10).
R14	<p>LDPs to contain a standardised trigger policy, which can be enacted where Annual Monitoring combined with the Delivery Programme reveal a shortfall and which will instruct new sites to be added to the supply through the application of SEA and Site Evaluation Tests.</p>
R15	<p>Where a Regional Spatial Strategy informed by a HNDA provides a view about housing and housing Targets, private sector targets should be set and monitored at functional market area geography and social sector targets at Local Authority geography.</p>
R16	<p>Local Authorities should establish governance arrangements around reporting on the Delivery Programme to ensure alignment of the capital programme and corporate delivery activities.</p>
R17	<p>Local Authorities to develop a particular focus on housing delivery, and the quality of design and place outcomes, making best use of the public sector estate</p>

Appendix 1 – Creating Great Places

1 Introduction

- 1.1 The Report of the panel undertaking the review of planning concluded that “Given the national significance of housing delivery”, the issues merit debate in parliament¹. HOPS also recognise the importance of these issues and indeed one of the central conclusions of this report is that the issues around planning for housing are considered cross- departmentally and at the highest corporate level within Local Authorities.
- 1.2 Along with other stakeholders, HOPS is concerned that the current system and debate around the Housing numbers, has become resource consuming to the extent that it detracts from the ability of planning to focus on delivery, infrastructure, design quality and the creation of great places for people.
- 1.3 Furthermore, the *apparent rigour* that has been brought to the system of planning for the housing will do nothing to improve levels of delivery of new homes in areas of weak market demand including some rural and island authorities, and in authorities experiencing population decline. To spend time arguing about housing numbers in locations of weak market demand, is time wasted that could be more positively spent addressing the challenges of such localities.
- 1.4 HOPS considers that there is a need to bring clarity, reality and to simplify a number of matters relevant to the context for planning for housing, and this report contains a number of recommendations in that regard.
- 1.5 We are keen to continue to work along with the government and other stakeholders including HfS, to develop a coherent housing policy context going forwards and it is hoped that this discussion paper may assist in that regard.
- 1.6 This report has been based on discussions and feedback from HoPS members (including postings on the KhUB) and presents a summary view. It includes a number of recommendations that could be progressed to provide further clarity in the short term.

2 The Purpose of Planning.

- 2.1 The Planning (Scotland) Act 2019 provides a purpose of planning as:
“to manage the development and use of land in the long-term public interest.”
- 2.2 This is helpful and put more simply, planning should be about shaping places for people.

3 Clarifying Roles

- 3.1 A simplicity and clarity of language is recommended within a context that recognises the role of the respective delivery partners in delivering new homes.
- 3.2 The following attempts set out in simple and clear terms respective roles and activities that influence the amount and rate of delivery of new homes.
- 3.3 The **Planning Authority Role** is 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;

¹ <https://www.gov.scot/publications/empowering-planning-to-deliver-great-places/>

Appendix 1 – Creating Great Places

- 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.
- 3.4 A planning authority **does not** deliver housing. The Local Authority may have a council house building programme, and could potentially procure housing delivery through an “arm’s length” delivery body. This type of activity has become prevalent in England and Wales.
- 3.5 The **Registered Social Landlord** role is to build homes primarily for social renting but some also build homes for private sale and rent. They do this primarily through Scottish Government funding however a number of RSLs are now also raising money through financial bonds and other financing arrangements.
- 3.6 Project commencement will be influenced by the priorities and funding of the RSL; RSL capacity; project management; construction sector capacity and contractual arrangements. Once committed to project delivery and development commences, new homes are generally built out, allocated and occupied rapidly.
- 3.7 **Private Home Builders** build new homes primarily for sale for owner occupation. Project commencement will be influenced by a number of factors including the granting of PP and other related consents such as RCC; market strength; construction sector capacity and contractual arrangements. Once committed to project delivery and following development commencement, new homes are generally built out, sold and occupied at the rate which is influenced by: construction sector capacity; project management; contractual arrangements; market strength; the quality, location and general attractiveness of the development; the house types, choice and pricing; the number of developments on site in the locality; and the ability of potential buyers to finance the purchase including through mortgage lending. Given the multiple factors influencing buyers, the rate at which a development of houses for owner occupation is built out, varies from development to development and can take place at rates that are faster or slower than anticipated. The independent review of build out rates in England and Wales led by the Rt Hon Sir Oliver Letwin MP is relevant in this regard.²
- 3.8 The requirement to fund substantial capital outlay and withstand risks, particularly for flatted developments where development takes longer to yield returns, is also a significant considerations for private sector house builders.
- 3.9 A range of **other factors and actors** within a complex operating environment, also have a direct influence on the amount, type, location and rate of housebuilding. These include factors such as government policy; global economic conditions; financial institutions; mortgage lenders; market sentiment; land owners; land buyers; planning consultancies; construction skills and materials; and behaviours and attitudes.

4 Clarifying Terminology

- 4.1 A number of clarifications in the terminology used within the policy context informing planning for housing, are recommended, taking cognisance of the preceding clarification of roles. In

² <https://www.gov.uk/government/collections/independent-review-of-build-out>

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general it is recommended that the number of terms used is reduced and simplified and that more reality is brought to the language and terminology used.

“Will Be Delivered”

- 4.2 Give the clarification of roles provided, this then lends itself to careful use of language and terminology within the forthcoming review of SPP with in NPF. For example in SPP para 115, The statements that “The housing supply target is the policy view of the number of homes the authority has agreed **will** be delivered...”, is an unrealistic representation of the role of the planning authority, which as described in the foregoing, has no direct delivery role.
- 4.3 If retaining this type of language relative to housing targets, the recommendation is that the phrase “**will** be delivered” is changed to “**could** be delivered”. A second preference is the use of “**should** be delivered”, which perhaps gives a greater sense of commitment to delivering on a target, without the disconnect from reality in the present use of the word “**will**”.
- 4.4 A number of clarifications of this nature are required in the refreshed SPP

R1	Language to be amended in Scottish Government policy to reflect roles.
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5 year effective land supply and established land supply

- 4.5 The term *5 year effective land supply* raises issues in that it erroneously conflates two separate measures:
- a) land available for development; and
 - b) the expected or programmed delivery of that land,
- and this has caused much of the confusion within the debate. Given the preceding clarification of roles, the Planning Authority can have significant influence over the amount of land available for development (a, above), subject to the willingness of land owners or ability of the Local Authority to assemble land.
- 4.6 However the Planning Authority has significantly less influence over the second measure b), delivery of the land, which is significantly influenced by the activities of RSLs, private home builders and the other actors and influences at the sharp end of delivery as set out above.
- 4.7 The Planning Authorities’ role in influencing the timing and rate at which a development is built out, is limited to those measures that influence the quality, attractiveness and suitability of the development through development brief preparation and negotiations with developers through the development management process.
- 4.8 The approach taken by Edinburgh City in their audit and related discussions, clearly sets out this distinction between Land and Delivery as detailed in the table below.

Land	Delivery
Input	Output
Physical quantity	Rate of construction
Managed by planning system	Controlled by development industry and landowners
Constraints readily categorised	Factors influencing rate not yet systematically monitored

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Allocations & permissions can cumulatively inform nature & scale of infrastructure actions	Delivery programme can inform and be informed by timing of infrastructure actions
Increasing quantity does not always increase delivery rate	Delivery rate can be directly affected by interventions
Increasing quantity does increase infrastructure needs	Increased rate can make better use of existing and planned infrastructure
Marketability of land to builders (market & housing associations) is relevant to viability, which can in turn be a constraint on a site.	Market conditions in the property market affect occupants' ability to buy (or rent), and hence affect delivery rates.

4.9 Given this rationale, HOPS recommend that the terms *5 year effective land supply* and total established supply, are deleted and replaced by terms which describes better the planning authority role in making **land available** for development as set out below. This language also reflects the Planning Scotland Act which requires LDPs to set out “the availability of land in the district for housing”:

- ***Total Available Land***: this is the total amount of land available for housing as identified in a Housing Land Audit. (In the example below this is 92,984 units)
- ***Total Unconstrained Available Land***: This is the total capacity of the land available for development where there are no constraints and a start could be made. (In the example below this is 65,782 units)
- ***Programming***: This is the programming of **All** sites to at least year 10. (In the example below this is 40,858 units)

4.10 These three terms together better describe the **land** made **available** within the development pipeline, the **delivery** of which is influenced by the many factors which impact on the rate at which housing is delivered.



R2	<p>The terms <i>5 year effective land supply</i> and <i>established land supply</i> should be deleted and replaced by terms which describes better the planning authority role in making land available for housing development as set out below:</p> <ul style="list-style-type: none"> • <i>Total Available Land</i>: this is the total amount of land available for housing as identified in a Housing Land Audit. • <i>Total Unconstrained Available Land</i>: This is the total capacity of the land available for development where there are no constraints and a start could be made
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	<ul style="list-style-type: none"> • <u>Programming</u>: This is the programming of All sites to at least year 10.
R3	The above terms to be accompanied by a diagrammatic of the development pipeline

Housing Land Audits

- 4.11 In the above context, HOPS would be happy to work with the Scottish Government and stakeholders to redraft PAN2/2010 on the role and approach of housing lands audits to measure these 3 elements:
- Total Available Land
 - Total Unconstrained Available Land
 - Programming
- 4.12 The criteria for defining what is currently described as the “effective land supply” in PAN 2/2010 are generally considered reasonable. However they are not absolutes in that for example, the requirement to address a physical or infrastructure constraint can be readily overcome when a site becomes viable and/or when the land is transacted at a value to allow its development.
- 4.13 Provided the clarifications are introduced as described in the above recommendations, the distinction between “Unconstrained Available Supply” and the Programming, the criteria remain broadly reasonable although HoPS may have some comments on some points of detail. The clarity introduced by separating out the land available from its expected delivery, would remove the unnecessary debate over marketability which would remain an appropriate criteria to consider in the programming and delivery of the available land supply. Marketability would not however impact on the suggested measure of “Total Unconstrained Available Land”.
- 4.14 HOPS is also highly supportive of the endeavours, including of the Digital Taskforce and Spatial Hub at the Improvement Service, to make Housing Land Audit information available on a national platform. In fact we wish this to be undertaken as a matter of priority, given the additional clarity and transparency that will be provided.

R4	Priority to be given to the development of Housing Land Audit information on a digital national platform
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5 Planning for Housing

- 5.1 The Act and planning review confirmed deletion of SDPs with replacement by Regional Spatial Strategies, a new role for NPF and Local Development Plans moving fully to a ten year timeframe. The changes imply a more strategic and long term role for LDPs.
- 5.2 HOPS want to see the development planning system for Scotland become truly plan led and to fully embrace the places for people agenda. In respect of land for housing, development plans should move to take directive control of land releases and away from a reactionary and process driven system that responds to “Call for Sites” and planning appeals.
- 5.3 To do this plans and planners require to have a good understanding of the housing need and demand in their areas, to take a longer term view of the needs of places, and to focus on delivery.
- 5.4 The outline of the system that HOPS see could deliver this, involve the following elements which are described more fully in the narrative that follows. HoPS agree with the independent panel

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about the importance of planning for housing and inherent throughout the approach recommended, is that within Local Authorities, that these matters are considered at the level of the corporate management team and cabinet

- Longer term more strategic plans more closely aligned with the LHS;
- Retention of HNDA;
- Bridging reports “Housing Policy Considerations and Housing Targets”;
- DPEA Examination of the Available Land Supply within the LDP Evidence Report;
- Annual Monitoring against Targets;
- Delivery focussed activities;
- Triggers for new land releases and/or other delivery activities
- Simplification and reduction of terminology.

Housing Policy Considerations and Housing Targets

5.5 HOPS support the use of the HNDA Tool which generates a number of homes required based on NRS Projections, and tenures that number based on households and income. This should lead to the setting of a Housing Target and HOPS support the retentions of this term within the policy landscape, and propose alignment of the development planning timeframe with the LHS timeframe. HOPS also have some parallel suggestions on the simplification and reduction of terms detailed later.

R5	HNDA to be retained
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5.6 However, Housing Need and Demand Assessments (HNDA), assess much more than just the number of new homes needed. They provide market context information regarding economic, demographic and affordability drivers; assess the level of social and affordable housing need; particular needs, and stock profile and pressure information. This provides the authority with an evidence base that informs their view of the housing requirements of their area including house types, house sizes, and the related issue of house prices.

5.7 It is mooted that following the completions of the HNDA evidence base, that the planners and housing colleagues, then jointly prepare a bridging report identifying what the HNDA means for Housing Targets, as well as housing policy and planning policy within the LHS and LDP. This report will be considered by the Council’s management team and Cabinet. This statement would cover the matters already specified in the HNDA Manager’s Guidance as detailed within:

- Section 11, How should an HNDA be taken forward?
- Section 12, Beyond the HNDA - Housing Supply Targets.

5.8 This bridging report “Housing Policy Considerations and Housing Targets”, would provide identification of the key matters to be addressed within the LDP and LHS straddling housing and planning considerations and may also branch into wider considerations such as health and social care. As well as considering the Housing Targets for new build, this report would also importantly draw out key issues within the existing stock that require to be addressed. This is important for policy makers as whilst nationally in 2018/19, about 18,000 new homes were built, the national stock of dwellings is around 2,500,000 and within that existing stock there are many policy challenges to address.

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R6	As per the HNDA Manager’s Guidance, housing and planning colleagues to prepare a bridging report (“Housing Policy Considerations and Housing Targets”), that is considered by the Council’s management team and Cabinet, identifying what the HNDA means for Housing Targets, as well as housing policy and planning policy within the LHS and LDP
R7	Policy and Guidance to reflect that housing monitoring and delivery is a matter of corporate responsibility within Local Authorities that should be considered at least annually by the Chief Executive, corporate management team and elected members
R8	To reflect the above, Scottish Government LHS, HNDA and development plan guidance on housing to be conjoined.

So how much land to provide at LDP stage

- 5.9 Clearly given the Planning Act, the role of NPF4 may be important but is currently not known. Draft LHS Guidance circulating in 2019, implies that the LHS and Local Authorities will continue to have a role in setting Targets.
- 5.10 Assuming that the Local Authority role continues, the amount of land provided within the LDP will be determined by the Targets set and the authority’s view of the land that is required to be made available to deliver the Targets set out in the “Housing Policy Considerations and Housing Targets” paper. Given the timeframe of an LDP, these now require to be 10 year Targets. Specifically for development planning, the Targets that are set will indicate the overall requirement for land supply and will enable the Planners to begin to consider the spatial implications. This will involve consideration of the need and demand for new housing and the Targets to be achieved over the ten year period of the Plan, along with the potential for growth of settlements influenced by the SEA/Site Evaluation framework. Other corporate plans and strategies such as economic and housing strategies, will influence the decision on Targets which should be agreed at corporate management team and cabinet level.
- 5.11 The amount of land made available will be tested at Examination by the Reporter and additionally an “Annual Monitoring” report will be considered by the Local Authority which will monitor the delivery of the Targets.

R9	Ten year Targets to be agreed at corporate management team and cabinet level and reported on annually in the Annual Monitoring and Delivery Programme. This would be the annual Housing Land Audit, with all sites programmed out at least to year 10, along with a commentary on delivery activities and the wider context and importantly recommended activities to meet Targets.
R10	LDPs to make sufficient land available to achieve delivery of the Targets using an based on the need and demand for new housing (HNDA), the Targets to be achieved over the ten year period of the Plan, along with an assessment of the potential for growth of settlements influenced by the SEA/Site Evaluation framework
R11	The spatial approach of the Plan in making sufficient land available to meet the Targets, will be tested at Evidence Report stage and subsequently monitored annually by the authority.

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Note on Generosity and Requirement

- 5.12 HOPS suggest, a simplification of the terminology including removal of the terms “Generosity” and “Requirements” alongside retention of the term “Targets” to sharpen the focus on delivery.
- 5.13 The current approach involves setting a Requirement calculated by adding a level of generosity to the Target. The nature of this calculation implies an element of arithmetic rigour which in the real world simply does not apply. The level of generosity of between 10-20% is not founded on any evidential basis and implies an exacting calculation, which if followed will lead to delivery of the specified Target. In the real world this does not apply. See also “Note on Formulae”
- 5.14 The terminology currently focuses on two measures:
- Land Requirements, whereby LDPS are tested at examinations, and,
 - Housing Targets, measured against delivery and completions usually at planning applications and appeals.
- 5.15 A formula was introduced within the PPF and Draft Delivery Advice to attempt to measure 5 year effective land supply and whilst this brought some clarification, confusion about when to apply the formulae, base dates and the approach to historic completions, has prevailed.
- 5.16 Given the confusion around how these terms are set, measured and tested, HOPS are seeking to simplify and clarify the approach and to move away from the use of these terms and formula.

R12	A simplification of the terminology including removal of the terms “Generosity” and “Requirements” alongside retention of the term “Targets” to sharpen the focus on delivery.
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How would the sufficiency of the Supply be Tested

- 5.17 Under the approach mooted, the following considerations would apply when the Evidence Report is under consideration:
- 1) For the Reporter at Evidence Report Stage – based on HNDA and the considerations articulated by the Local Authority’s “Housing Policy Considerations and Housing Targets” report, are the **10 Year Housing Targets** appropriate.
 - 2) For the Reporter at LDP Evidence Report Stage –is the authority making sufficient land available in the to achieve the 10 Year Housing Targets.
 - 3) To determine this, the Reporter would rely upon the Annual Monitoring Report and Delivery Programme which will provide detailed information on the Total Available Land, Unconstrained Land and Programming for each site and location, as diagrammatically represented in the Development Land Pipeline.
- 5.18 In the interests of clarity, at the Evidence Report Stage stage, no formulaic calculation is advocated, but rather an assessment by the Reporter on the sufficiency of the supply based on analysis of the available supporting information including:
- the HNDA;
 - the “Housing Policy Considerations and Housing Targets” report;
 - the Local Development Plan itself and its spatial development strategy;
 - the SEA/Site Evaluation framework; and

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- the Annual and the Annual Monitoring and Delivery Programme (which includes the Housing Land Audit programmed to at least year 10).

5.19 Using all the above information provided, the Reporter will make a judgment as to the adequacy of the land supply to deliver the Plan’s spatial strategy.

R13	<p>Formulaic calculations to be removed in place of the Reporter’s assessment at Evidence Report stage. Material considerations of this assessment will include:</p> <ul style="list-style-type: none"> • Relevant Local Authority strategies e.g. housing and economic strategies; • HNDA; • “Housing Policy Considerations and Housing Targets” report; • corporate management team agreement of Targets; • Local Development Plan itself and its spatial development strategy; • SEA/Site Evaluation framework; and, • Annual Monitoring and Delivery Programme (which includes the Housing Land Audit programmed to at least year 10).
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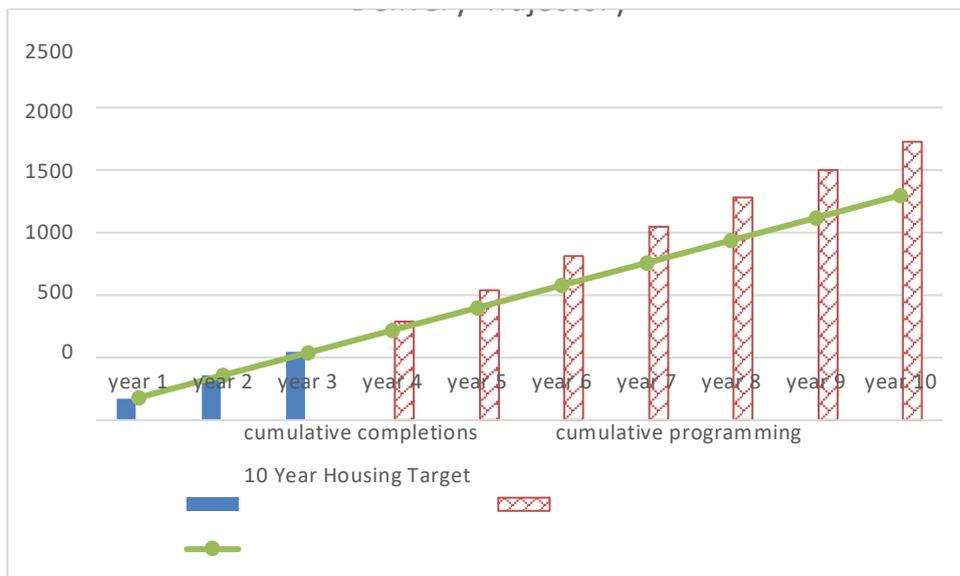
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Note on Formulae

5.20 Whilst it is understood why we have got to where we are around planning for housing numbers, the formulaic calculations and detailed discussions at appeals and examinations, imply a level of *spurious accuracy* that in reality simply does not exist. In some areas of low demand, no matter what numbers are derived by whatever method, the low demand characteristics of that location will not change, whilst in some areas of high demand, some restraint on unchecked growth is required to achieve wider policy ambitions such as urban densification, regeneration or planning for specific housing need such as specialist provision or older people. We all need to understand the various drivers and individual circumstances, in order to make informed judgments about planning for the long term future of areas and what is advocated is considered to be a more rational and rounded approach to evidence on land availability and its likely delivery and rate of delivery.

Annual Monitoring and Delivery Programme

- 5.21 Alongside the preparation of the annual audit, an annual monitoring statement will be prepared indicating how the available land supply is performing relative to delivery of the targets. This will ensure that every year, consideration is given to delivery issues and should performance be thought to be at risk of falling short of Targets, the issue can be flagged and options for action considered including land releases informed by SEA; Site Evaluation Frameworks and other policy considerations. This could be used in a manner similar to the Delivery Tests being applied in England and Wales. <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>
- 5.22 Again, HOPS consider the issues to be important Local Authority business and it is recommended that such annual monitoring reports be considered at the level of the Local Authority Management Team and cabinet as per Recommendation 9 above.
- 5.23 Annual monitoring would chart in a Trajectory, completions and programming each year towards the overall **10 Year Housing Targets** and identifies when the Targets may be at risk of not being achieved and what potential actions may be taken.



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Triggers

- 5.24 Over 85% of sites take longer than 5 years from first entering the Established Supply till delivery of units (Clydeplan Housing Land Annual Monitoring Report 2017). Given this statistic, a steady stream of short, medium and longer term sites are required within the Established Supply to ensure continuous delivery and the achievement of Targets.
- 5.25 LDPs should contain a standardised trigger policy which can be enacted where Annual Monitoring combined with the Delivery Programme (as per Draft Planning Delivery Advice-Housing and Infrastructure³), indicate that a risk to the delivery of the land supply is emerging. The Trigger should clearly instruct new sites to be added to the supply through the application of SEA and Site Evaluation Tests. These “Plan B” sites, could potentially be identified within the LDP.
- 5.26 Equally however, there may be circumstances where additional sites will not improve delivery and the combination of the evidence gained through Annual Monitoring and Delivery Programmes, should enable the authority to make the case for appropriate alternative and/or additional measures, to improve delivery where land supply alone is not an impediment to delivery.

R14	LDPs to contain a standardised trigger policy, which can be enacted where Annual Monitoring combined with the Delivery Programme reveal a shortfall and which will instruct new sites to be added to the supply through the application of SEA and Site Evaluation Tests.
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Geography, Tenure and Regional Spatial Strategies

- 5.27 The geography and tenure at which Targets are set are important considerations. Where a Regional Spatial Strategy is being prepared predicated on a HNDA, this will allow the opportunity to consider housing need and demand at the scale of the functional housing market area.
- 5.28 Private sector demand arises and should be met at the scale of functional market area meaning that private sector Ten Year Targets should be set and monitored at that geography.
- 5.29 Social sector need arises and is met at Local Authority geography and therefore targets should be set and monitored for this sector at that geography.

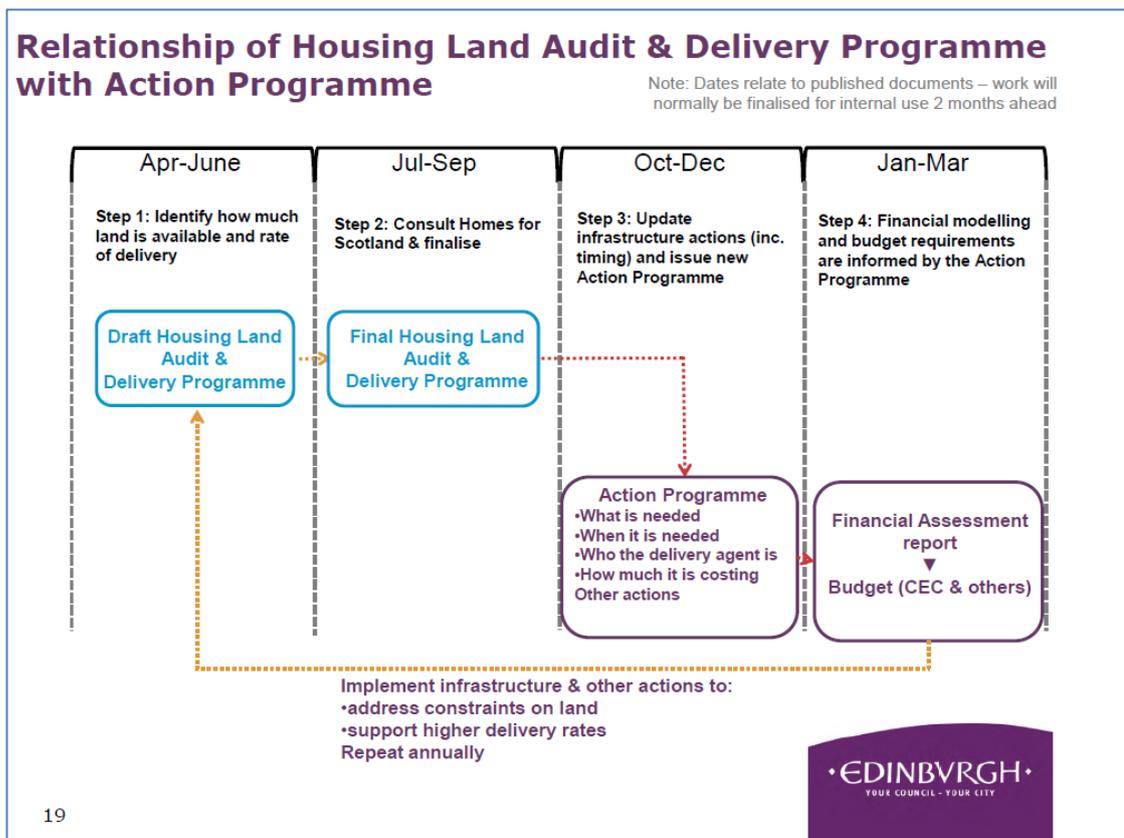
R15	Where a Regional Spatial Strategy informed by a HNDA provides a view about housing and housing Targets, private sector targets should be set and monitored at functional market area geography and social sector targets at Local Authority geography.
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³ <https://www.gov.scot/publications/draft-planning-delivery-advice-housing-and-infrastructure/>

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6 Delivery Activities

6.1 As we move towards a development planning system which has more time built in to focus on delivery related activities, this should enable more resource to be committed to “Delivery Programmes” and other outcome focussed activities. A corporate and cross departmental focus on the LDP and its delivery programmes should be developed with governance arrangements established within Local Authorities to ensure that these matters are corporately considered. This will support improving alignment between the land audit programming of sites, delivery programmes, and Local Authority capital programmes, in order to more effectively plan and align infrastructure and delivery. Edinburgh City provides a good example of how this can be achieved in practice.



6.2 Examples of other outcome focussed delivery activities include the following:

- preparation of development briefs or masterplans to accompany all site allocations;
- a focus on infrastructure delivery;
- a particular focus on the approach to the public sector estate;
- A vision for places along with a focus on corporate working across key services including community planning and housing;
- development of innovative funding and delivery packages;
- direct delivery activities e.g. council housebuilding;
- a clarity around the corporate approach to development contributions;

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- efficient processes both for development plan preparation and development management decision making;
- viability assessment and deficit funding.

R16	Local Authorities to establish governance arrangements around reporting on the Delivery Programme to ensure alignment of the capital programme and corporate delivery activities.
R17	Local Authorities to develop a particular focus on housing delivery, and the quality of design and place outcomes, making best use of the public sector estate

7 Other Considerations

- 7.1 There are a number of other relevant matters not fully addressed within this report and further views and discussion are welcome. These include the list below and others may have other suggestions on where there is a requirement to bring more clarity and consistency and how that can be achieved:
- The relationship with NPF4;
 - The calculation of Windfall;
 - The contribution from small sites;
 - The role of Urban Capacity Studies.

8 Concluding Comments

- 8.1 HOPS recognise that a definitive approach to the calculation of a housing land requirement within an LDP is not set out but there are advantages in taking that approach. The current system implies a level of spurious technical accuracy that simply does not exist and detracts from a focus on quality and delivery.
- 8.2 What is set out is an approach to planning for housing that enables more overall coherence, more understanding of delivery issues, more cross departmental and corporate responsibility, and more delivery focussed activities, rather than re-creating a system that applies a blunt formulaic approach and assumes that land supply alone will improve delivery. This latter assertion is patently incorrect given that nationally we have an “established land supply” of over 400,000 units, an “effective land supply” of circa 150,000 units (which would deliver an estimated 30,000 units for the next 5 years), but delivery currently at around only 17,000 units⁴. The simplistic assertion that additional land supply will solve housing delivery issues, obfuscates a much more complex reality around the issues affecting delivery and detracts from more significant wider housing policy issues which planners and housing professionals should usefully be spending more focus on. The general approach set out in the foregoing attempts to achieve that aim and is commended to the Scottish Government and wider stakeholders for discussion.

⁴ <https://hopscotland.org.uk/publications/planning-performance-framework-reports/>