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Dear Sir / Madam

National Planning Framework 2 - Response by Dawn Homes Ltd

We write with reference to the above discussion paper and outline our comments in response below.

Firstly, as background, Dawn Homes Ltd is part of the Dawn Group which has a turnover of around £122million per annum. Dawn Homes itself builds around 250 houses per annum in Central Scotland and in 2004 set up a strategic land arm which sole purpose is to promote and rezone land through the development plan process. We have promoted several large scale projects through the development plan process, including the former Hoover plant in Cambuslang where we secured zoning for 300 residential units and also Ayr Racecourse where we secured planning consent for 400 residential units. We have also recently been selected as the preferred bidder for a site at Bellgrove in Glasgow's East End.

Consultation Response

We would firstly highlight that as we are a housebuilding company, the comments we have made in response to this discussion paper are mostly with respect to the Housing section from paragraph 169.

Dawn Homes welcome the review to the National Planning Framework and fully support the ambition to increase the rate of new housing supply in Scotland to at least 35,000 a year by the middle of the next decade. We would consider however that it has not been emphasised strongly enough that this actually represents a 40% increase on 2005 building rates, and that in order for this to happen, significant action needs to be taken now in the setting of housing land supply targets, and the delivery thereof at both strategic and local levels.

To move toward this, a build rate of 30,000 units per annum would have to be set as a target between now and 2011. Additionally, the build rates which would be required in two of the countries biggest city regions being Aberdeen and Aberdeenshire, and Glasgow and Clyde Valley, with regard to household projections, would have to be approximately 2,600 units, and 10,200 units respectively per annum by 2011, and 2,900 units, and 11,900 units respectively per annum by 2015. Given that these are the only two regions whose boundaries have been confirmed, we were unable to work out the target figures properly for the other key city regions. Evidence that the planning system can provide these required unit numbers is not apparent at present.

It should also be recognised within the review that the achievement towards this target needs to be monitored annually at each and every local authority level as steady progress is vital. We note with considerable dismay after reading the recently published West Lothian Local Plan Inquiry Report that scheduled development in the three CDA's has been recommended by the Reporter to be put back by around two years to 2012 / 2013 due to the single issue of the provision of a denominational secondary school. Whilst we understand what the Reporters are trying to achieve by recommending this, we would question how West Lothian, one of Scotlands fastest growing areas, could possibly help towards reaching the fundamental nationwide target of 30,000 new homes annually from now to 2011. In our opinion a way round this issue in West Lothian would be for developers to pay reasonable contributions per house beforehand and ringfence those funds so that they may only be utilised for the development of the school. These funds should however be returned by the Council to the builders if not utilised within a specified time period of say 5 years.

Paragraph 170 of the review highlights that high quality strategic planning for housing and the setting of realistic housing supply targets is required through the Local Housing Strategies and development plans of local authorities. We would reiterate our comments made in response to the Draft SPP3 paper where we suggested that everything be included – e.g. the Local Housing Strategy (LHS), and the Strategic Housing Need and Market Assessment (SHNMA) altogether within the one document as part of the Development Plan for the area. This seems to work well in Ireland and has been beneficial to the Irish economy. Indeed part 95 (1) (a) of the Planning and Development Act 2000 of the Republic of Ireland reads: *"In conjunction with the inclusion of the housing strategy in its development plan, a planning authority shall ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period of the development plan."* We can not see why a similar approach can not be adopted in Scotland, particularly given that Ireland has built on average over the last few years more than 80,000 new homes annually, even though it has a smaller population than Scotland (Population of 4.2million in Ireland and 5.1million in Scotland as at 2006).

In paragraph 171 of the review paper it is stated that facilitating an improvement in the responsiveness of housing supply to demand will be a priority for the new development planning framework, and that constituent local authorities should take a broader view of the options for increasing the supply of housing of the right type and tenure where it is needed most. We would comment that local authorities should be instructed to identify sites of all sizes – large, medium and small, and also to deliver planning consents quicker. If the delivery of quicker consents is to be dependant on the development plan process, clearly the timetable for the preparation of these will have to be speeded up, and it appears to us, it will be undoubtedly necessary that consents be granted in advance of the development plan, particularly if they accord with the locational preferences set out in the current approved or about to be approved structure plans.

Paragraph 172 then goes on to discuss the revision of SPP3 which as stated above, we have already responded to. It is stated in this paragraph that the revised SPP will strengthen the policy direction given to local authorities on how they should ensure provision of a generous supply of land for future housing development. We would reiterate our response to SPP3 which commented that whilst we agree that land allocations in plans have to be sufficient to ensure delivery of requirements, and guarantee maintenance of a 5-year minimum supply through identified sites in Plans, we would consider that the term 'generous' needs to be offered clarification, especially if this supply is to deliver substantial elements of affordable housing as well. What might be considered as a 'generous' supply of land by an authority may not be considered so by developers and will therefore undoubtedly lead to disputes at inquiries. For flexibility, we suggest a minimum of 20% above the mathematical requirement should be added to accommodate unforeseen circumstances or market changes. Overall, we are not persuaded that radical enough actions have been proposed in SPP3, and so much is to be made dependant on SHNMA's which are not even subject to any independent scrutiny

according to the Draft Guidance document issued on the 18th March 2008 which stated that the approach used in SHNMA's will not be considered at examination.

It is noted that paragraph 172 includes an extract from PAN 74 on Affordable Housing. We are not content with the wording of the extract used, which if realistic should really read: *'notably through the establishment of a benchmark figure of 25% of all new housing developments to be affordable homes were justified by a **robust housing assessment as part of the development plan process, and not as part of some unrelated process as is so often the case to date**'*.

We do note that with the demise of Communities Scotland, the first move has been made in decades by some local authorities to facilitate or to provide affordable housing themselves, but it has to be recognised that the key driver of this is funding from the Scottish Government. It is concerning that no reference has been made to the availability of funding in relation to the provision of affordable housing in NPF2. Additionally however, it is obvious that the greater the amount of land released for all types of housing then the greater the amount of affordable housing there will be. This point needs to be realised not only by the Scottish Government but by all local authorities throughout Scotland, which is not at all apparent from the responses we have seen to Firm Foundations and SPP3.

The only other point we wish to make in response to the review paper is with respect to the section on Vacant and Derelict Land. In our opinion it would be beneficial to have a national body managing this issue similar to that of English Partnerships in England – 'Scottish Partnerships' perhaps.

We would respectfully ask that our comments made above be taken into consideration prior to the finalisation of NPF2.

Yours sincerely

[REDACTED]
Mhari Colquhoun
Land & Planning Assistant
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RESPONDENT INFORMATION FORM: NATIONAL PLANNING FRAMEWORK 2

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

Name:

Postal Address:

1. Which document(s) are you responding to?

Discussion Draft National Planning Framework 2

Discussion Draft Environmental Report

Discussion Draft Environmental Report Non-Technical Summary

2. Are you responding: (please tick one box)

(a) as an individual

(b) on behalf of a group/organisation go to Q3a/b and then Q5

go to Q4 and then Q5

INDIVIDUALS

3a. Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government website)?

Yes (go to 3b below)

No, not at all We will treat your response as confidential

3b. Where *confidentiality is not requested*, we will make your response available to the public on the following basis (please tick one of the following boxes)

Yes, make my response, name and address all available

Yes, make my response available, but not my name or address

Yes, make my response and name available, but not my address

ON BEHALF OF GROUPS OR ORGANISATIONS:

4. The name and address of your organisation *will be* made available to the public (in the Scottish Government library and/or on the Scottish Government website). Are you also content for your response to be made available?

Yes

No We will treat your response as confidential

SHARING RESPONSES/FUTURE ENGAGEMENT

5. 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 the Scottish Government to contact you again in the future in relation to this consultation response?

Yes

No