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From: Tom Hardie [tom@hardieplanning.co.uk]
Sent: 25 January 2008 14:31
To: Housing Consultation 2007
Subject: Firm Foundations report



AmendedFirm
Foundations notes...



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Dear Becky,

Please find attached comments on behalf of my clients, Angus Estates and Buccleuch Estates. We are content for these comments to be made public as is the norm with Government consultation exercises.

We look forward to receiving any amendments or further drafts and the final version of the report. Firm Foundations is potentially a hugely significant document for Scotland's housing and planning systems. We hope the Scottish Ministers are bold enough to see the document's vision through. Please get in touch if you have any questions.

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Firm Foundations: The Future of Housing in Scotland, A Discussion Document

1. This document sets out how the Scottish Government (SG) wishes to see housing in Scotland delivered and discusses, amongst other things, the role planning has in delivering their vision.

Comment: It is imperative that the planning system, and particularly, the preparation of formal development plans (which currently take about 3 years on average from drafting to adoption, following a local plan inquiry) are not allowed to stymie house building progress. SPP3 currently contains a mechanism which allows second phase land allocations to be “rolled forward’ in areas where there is recognised shortfall and need. This should become the norm in all areas. This mechanism should be emphasised in the review of both SPP3 and SPP1.

2. The SG has set out a vision for the future of housing in Scotland. This has four elements:

- An increased supply of housing across all tenures, all of which is delivered on the basis of higher environmental and design standards
- More choice of housing that those on lower incomes can afford
- Housing developments that contribute to the creation of sustainable, mixed communities.
- Social housing that provides better value for public expenditure

3. One of the main aims of the document is to discuss ways in which housing supply as a whole can be increased and address the failure to sufficiently increase the supply of housing in response to rising house prices. The proposals, it is argued, see a shift in housing policy from recent years. There is now a “new emphasis on increasing overall housing supply, to achieve a fairer system of housing, and on driving up environmental standards, to meet the challenges of climate change and sustainable development”.

4. The document identifies the planning system as being very important in enabling housing development and promoting the increasing environmental standards. The report says that:

‘The planning system has struggled to respond to demand, failing to enable an acceleration in housing supply. While the implementation of the Planning etc. (Scotland) Act 2006 will help improve the responsiveness of housing supply in the longer term, there is a pressing need for measures in the short term to increase the supply of housing land and accelerate the delivery of new homes’.

Comment: Agree wholeheartedly with this. As mentioned above there exists a mechanism, through SPP3, of bringing second phase land and windfall sites on sooner, without it being subject to a formal development plan review. This mechanism should be emphasised and clearly restated in the revised SPP3.

5. The Firm Foundations report states that house building will be within and around existing settlements although there is a need to also encourage much expanded or new, stand alone settlements in the right locations. The current rate of house building in Scotland is around 25,000 a year for the whole of this decade and there hasn’t been

much of a planning response from the increased demand. The SG wants to see the house building rate increase and by the middle of next decade wants to see 35,000 homes built per year.

Comment: In addition to new settlements, there has to be scope for more rural housing “clusters” outwith settlements, but well connected to them, especially where they are on brownfield land and introduce economic benefits to rural areas that would enable people to work from home and start businesses. Such clusters are promoted in SPP15 and this should be acknowledged in this report. There has also been a dramatic increase in demand for ‘work from home’ accommodation in rural locations that is currently not being met by planning authorities. Such initiatives would help reverse the need for commuting and can be extremely sustainable, if the houses are well designed with energy efficiency and green principles to the fore.

7. The SG sees the planning system having a very important role for the delivery of these homes and “expect plans for urban expansion in development plans to form part of long term settlement strategies rather than approaching housing land releases on a field by field basis. Proposals for the release of land currently designated as green belt can be considered as part of that wider approach, the aim of which is to provide clarity and certainty about the long-term direction and scale of growth. Confidence in green belts can only be sustained against the background of a long-term settlement strategy.”

Agree.

8. The Scottish Government wants to see further integration of land-use planning and housing strategy. This can be achieved through a strengthened national policy framework and will include the revision of SPP3, which will strengthen national planning policy to ensure the provision of sufficient land for housing and to support the creation of quality residential environments.

9. As part of a review of SPP3, the SG want to consider how a presumption could be introduced that will enable planning permission to be granted for developments in advance of land being designated in a development plan in circumstances where a demonstrable shortfall of housing exists. In areas where there are particular pressures on housing supply, the FF report states “there is a need to encourage the quicker release of land for housing and the more effective use of existing housing land allocations. Importantly the review will consider how a presumption could be introduced that will enable planning permission to be granted for developments in advance of land being designated in a development plan in circumstances where a demonstrable shortfall of housing exists.”

Comment: As mentioned above SPP3 currently allows second phase development plan land allocations to be “rolled forward” in those areas where there is a recognised shortfall without the need of a formal time-consuming development plan review. However, there should also be scope to allocate new land and sites, without the need of a development plan review, particularly brownfield land (urban and rural) for housing development. This could be supported by other policies in the development plan, and is land best described

as windfall land i.e. land not previously formally considered through the housing land audit process. The onus would be on the developer to justify why such land and sites should be developed for housing development, based on sustainability principles.

10. Housing in Rural Scotland is also discussed, particularly the provision of affordable housing. The Scottish Government see an important role for the private sector in helping deliver affordable rural housing and will look for good examples to raise awareness and motivate others to get involved in similar ways.

11. However, the report states that for sustainability and economic reasons, new house building should be within and around existing towns, cities and villages wherever possible, making best use of brownfield sites and existing infrastructure and thus minimising the need for commuting.

Comment: This is a rather narrower view for housing in rural Scotland than that expressed in SPP15: Planning for Rural Development, which envisages small housing and business developments to proceed outwith settlements, in appropriate locations, and provided sustainable criteria are met (para21 of SPP15). It is particularly important where rural brownfield land is involved, land which is often derelict and contaminated and in need of rehabilitation, that some form of enabling housing development is allowed and positively encouraged by planning authorities. SPP15 encourages entrepreneurs to come into rural Scotland to create jobs by allowing them to live and work in individually designed houses and plots. The policy should be therefore not just about social housing in rural Scotland but providing choice including upper range sustainable, well designed, energy efficient housing and plots and eco-housing.

There is now evidence (Planning for Sustainable Rural Communities: A New Agenda, The Commission for Rural Communities, 2007) to show that incremental suburbanisation of towns, as traditionally supported by planning authorities with an urban focus, has led to many very unsustainable developments where housing estates in towns are peripheral to services, are poorly designed and where families with low incomes and low car owner/usership have to rely on very poor public transport services to access services, sometimes more than two miles away. This has increased the level of social isolation for inhabitants. The CRC report provides evidence to show that it is more sustainable and socially beneficial to allocate development in or near small rural villages and support key services in these areas.

11. Two other major proposals discussed in this report are the proposal to end the right to buy for new social housing and the proposal that the Government should offer incentives for local authorities that are prepared to undertake new council housing.

12. The report sets out a clear message that the Scottish Government wants to see a dramatic increase in the numbers of houses built from present but also want these new houses to be well designed with high levels of sustainability present. The SG sees a key role for the planning system in enabling the delivery of the ambitious new build

targets. There is likely to be a key role for rural areas in absorbing some of these house build targets.

Comment: It is important that rural areas are also seen as a priority for helping to meet these house build targets. Indeed SPP15 and its objectives should be mentioned in this regard. SPP15 includes the criteria necessary for bringing forward small-scale clusters of developments, appropriate in scale and kind to their location and which can fit in the landscape. This would help accommodate more rural housing and be sustainable. It would also stimulate the rural economy.

Tom Hardie
January 24, 2008