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Sent: 25 January 2008 14:45
To: Housing Consultation 2007
Subject: Firm Foundation - The Future of Housing in Scotland



Firm Foundations
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Dear Ms Smith

Please find attached SNH's response to the above consultation.

Regards
Helen Gifford

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Our ref: PF 184/07-08

Date: 25 January 2008

Dear Ms Smith

**FIRM FOUNDATIONS – THE FUTURE OF HOUSING IN SCOTLAND. A
DISCUSSION DOCUMENT**

Thank you for consulting SNH on the above document. We have, of course, also been consulted on the draft Scottish Planning Policy 3 – Housing and the draft National Planning Framework 2, as well as the various elements of the modernising agenda pursuant to the 2006 Scottish Planning Act, all as issued by your colleagues in the Planning Directorate.

We note that much of your discussion document is concerned with broad policy initiatives aimed at increasing the availability of affordable housing across a range of tenures. It does, of course, also suggest that the general supply of housing be

increased to a level of 35,000 units per year and promotes the development of new sustainable communities through new stand alone communities and/or the expansion of existing settlements.

We have only limited comments on the broader policy initiatives, and these are contained in the attached annex in relation to questions 30 - 32 regarding the quality of open space and greenspace.

However, the broader issues of overall supply and the development of new sustainable communities do directly impinge on our remit in terms of our interest in, and involvement with, the land use planning system, and in terms of the potential implications for the natural heritage of planning policies and individual development proposals such as housing development. We therefore refer you to our responses and input to the Planning Act and our subsequent contributions to the preparation of secondary legislation, and the emerging NPF2 and SPP3. As you will see from these contributions, we fully support Scottish Government's modernising agenda for the planning system and the emphasis placed on an efficient, transparent and inclusive plan led system aimed at securing sustainable forms of development and sustainable economic growth.

This response to the above discussion document does, of course, precede our formal responses to NPF2 and SPP3, whose periods for comment began 7 January do not expire until 14 April and 31 March 2008 respectively. We would be grateful if you would refer to our subsequent responses when reviewing reactions to this Document. However, our comments on an initial draft of SPP3 were provided to Planning Directorate in December 2007 and indicated 2 principal issues, both of which are relevant to Firm Foundations. The Annex to this letter also includes brief responses to questions 1 – 5 which draw on the following discussion.

Overall Housing Requirement

It is not within SNH's expertise to comment on either the methodologies promoted in the draft for identifying increased housing needs, or on the overall requirement identified by Government in SPP3 and Firm Foundations. However, there is concern that the scale of development plan land allocations required to meet this objective could have considerable implications for the natural heritage, in particular, the landscape capacity and landscape character of peri-urban and rural areas and that it may be difficult to accommodate the scale of development being identified without damage to the natural environment.

This position also reflects our concern that the "optimistic" socio-economic growth assumptions contained in many development plans may result in unrealistic and excessive cumulative land allocations. As stated in our recent responses to the Scoping Report for SPP3 and to Structure Plan consultations, it is therefore vital that Scottish Government monitors the cumulative socio-economic assumptions contained in future development plans and ensures, through policy statements such as SPP3 and NPF2, that adequate controls are imposed over the phased take-up of development plan allocations. Such an approach should result in the prioritisation of development aimed at avoiding the "cherry picking" of the easiest or most attractive sites where these are also the most environmentally sensitive sites. This may also require the identification of appropriate criteria for some rural areas where development is likely to be smaller scale and more opportunistic than in those urban areas subject to large scale development pressure. A monitoring regime as proposed in Firm Foundations and the initial draft SPP3 should therefore recognise the possibility that the level of projected housing demand slows rather than accelerates.

Site Selection and Detailed Design

We fully support the intention to secure “the right sites in the right places” and inclusion of environmental enhancement and protection as a key issue in the identification of the required sites. We also support a requirement that the site selection process should be holistic with reuse of land and buildings taking precedence over greenfield release, all of which would be consistent with SPP21 “greenbelts” and the modernised development plan led planning system. However, it is important that this process fully incorporates the protection and enhancement of the environment consistent with NPPG14 “Natural Heritage”. Particular reference should be made to the consideration of landscape character and the landscape capacity of areas under consideration for greenfield release. We suggest that particular emphasis should be given to the value of landscape capacity studies in identifying strategic areas of search and precise sites within the broad locational strategies and local plan allocations. We draw your attention to our commissioned report “New housing, settlement expansion and the natural heritage” (LUC 2005).

http://www.snh.org.uk/pdfs/publications/commissioned_reports/F04AA501.pdf

This report considers the role of development plan policies and supplementary guidance in securing sustainable housing through the integration of development and the natural environment, and explores the way in which housing development can take account of landscape character, opportunities to protect and enhance biodiversity; and provision of open space access and recreation.

Landscape capacity studies could provide crucial information for the consideration of development plan policies and allocations, particularly in areas of intense pressure for development, such as areas around major centres or locations attractive to incomers and commuters (e.g. Inverness, Falkirk/Stirling, St Andrews and the central belt conurbation). The consideration of landscape capacity and the contribution of landscape character to local distinctiveness should be identified as a specific factor when considering the option of new settlements.

In summary we understand Scottish Government's vision to increase the supply of all types of new housing, and the particular emphasis on increased affordability and social housing. We note the specific target of raising annual completion rates to 35,000 per year and the emphasis on doing so through the development of new sustainable communities. However, we are concerned that the confirmation of this target and the identification of required sites should be promoted and implemented through the land use planning system, in particular, through the national planning policy framework to be set by NPF2 and SPP3 and the operation of a modernised plan led system. In this regard we would expect the proposed target to be subject to Strategic Environmental Assessment as part of the preparation of NPF2 and SPP3; and through the policies and development management procedures to be provided in the planning system. We also refer you to our responses to the emerging and consultative draft NPF2 and SPP3, and to the secondary legislation and guidance implementing the Planning Act.

I hope these comments are helpful, but please contact Ian Anderson (01786 435392 ian.anderson@snh.gov.uk) if you would like to discuss in greater detail.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jane Clark', written in a cursive style.

Jane Clark.

Head of Sustainable Land Use.

ANNEX

FIRM FOUNDATIONS THE FUTURE OF HOUSING IN SCOTLAND SNH RESPONSE TO SPECIFIC QUESTIONS

Question 1. Do you agree that aiming to increase the rate of new housing supply in Scotland to at least 35,000 year by the middle of the next decade is a sensible and realistic ambition, and that this will help set a necessary political context for acceleration in housing supply?

We have no comment on the analysis of housing supply but are concerned that the suggested target should be subject to Strategic Environmental Assessment and delivered through the modernised plan-led planning system aimed at sustainable development. We have no comment on the intended increase in the rate of house construction, but do have concerns about an increase in housing land allocations and any “short - cutting” of the proper planning process to speed up construction.

Question 2. Do you agree that to give practical effect to the ambition, local authorities should co-operate regionally in setting realistic housing targets for housing market areas, and enabling the delivery of these targets? If so, what arrangements should be put in place to support and provide incentives for such co-operation between relevant local authorities?

We have previously expressed concerns regarding the cumulative effects of the “optimistic” growth assumptions and targets used by Structure Plan Teams and individual local planning authorities when identifying future requirements for housing and employment land. We have made no comment on the validity of the methodologies used in the development plans. However, we have suggested that monitoring of each development plan should be linked to controlled and phased release of land and that a national overview be monitored, perhaps through the NPF.

We would therefore support greater collaboration between planning authorities in the context of a nationally determined requirement. Such collaboration could usefully be provided where appropriate through the future Strategic Development Plan Authorities and/or a requirement for joint working between the constituent authorities of particular housing market areas.

Question 3. Is there a role of a specialist national function to provide expert support for local authorities in strategic planning for housing? What expertise do you think this function would require?

The further guidance aimed at integrating land use planning and housing strategy would appear to be essential, while a national steer could provide logical parameters for the identification of land requirements within planning authorities land use plans. However, setting of such a national target should be subject to SEA through the preparation and finalisation of NPF2 and SPP3. Local Authorities should also be encouraged to draw on environmental expertise as inputs to strategic planning. SNH clearly supports Authorities by responding to strategic housing policies. For example we are currently working on region wide housing allocation strategies with Borders and Fife and have done so with many other authorities in the past. Primarily, these studies have looked at landscape capacity as a key natural heritage issue, but latterly we have supported more sophisticated studies that have looked at wider sustainability issues and the potential of open space within allocation sites to create or link into green networks.

Question 4. Even when land has planning permission there are still blockages that prevent new housing being built. What additional arrangements would, or could, accelerate development on land with planning permissions to help ensure that future housing supply targets are met?

We have no suggestions as to how the implementation of planning permissions might be accelerated, but whatever initiatives are proposed they should be implemented via the plan led planning system with due regard being paid environmental considerations and the need for a high quality of design. All as noted in the Discussion Document.

We fully support Scottish Government's proposals for modernising the planning system, including the requirement for extensive pre-application discussions as a means of increasing the transparency of the decision making process and also as a way of speeding up that process in relation to specific proposals. There is a clear responsibility on consultees such as SNH, as well as Local Authorities to respond efficiently to proposals. However, as we have argued previously, there is an equal onus on applicants to ensure that applications are based on and supported by appropriate information and detail, and thereby pre-empting future delays in the clarification of Environmental Statements or subsequent reserved matters. Greater effort at the outset should result in ultimately quicker decisions, and produce high quality proposals that are in line with national planning policy. To assist this process there may be scope for further good practice guidance, perhaps with worked examples on matters such as master-planning (underway with PAN83), development briefs, design guidance, landscape and open space provision and on-going agreements for the management of public realm and open-space.

Question 5. We have proposed that much expanded or new, stand-alone settlements may be a valid solution. How should we best encourage the development of new, sustainable communities, that are sympathetic to Scotland's landscape and environment?

As noted above, we see the planning system as the principal mechanism for delivering sustainable development. This includes the national context to be set by NPF2 and SPP3, as well as the identification of appropriate locations through development plan policies and land allocations; and through the detailed design of specific proposals in accordance with national and local planning policies. As also noted above, landscape

character and landscape capacity studies should be a key element in development plan and development management processes.

SNH has been involved in several new settlement proposals in recent years. From our experience there is a strong need for a clear process of site identification through the study of several key issues such as transport, landscape capacity and a wide range of other environmental planning issues.

In terms of achieving design quality and community cohesion in new settlements we see a key role for a well considered approach to master-planning that incorporates the key elements of national planning guidance and good practice and a process which ensures clear stakeholder participation. As an organisation we see great potential for new settlements and large settlement extensions to fully incorporate the principles of sustainable development which includes utilising creative and good practice techniques for protection and enhancement of the natural heritage. There are some good practice examples being developed with regards planning for new settlements but SNH considers that there is scope for further sharing of good practice for developing sustainable new settlements within the planning and development sectors.

Questions 6-14 – no comment

Question 15. What other schemes or incentives might help us to recycle empty properties more effectively?

We have no suggestion as to possible incentives but do support the overall initiative to recycle and reuse vacant or unused property, particularly within rural areas.

Questions 16-29 – no comment

Question 30 . Do you agree that we need to find new ways of focussing on the quality of place/open space and greenspace within deprived neighbourhoods?

Safe, clean local environments that are good for people and nature deliver multiple benefits for local communities, including improvements to individual health and community well-being. Improving the quality of the local environment can play a critical role in reversing deprivation through helping to empower communities, regenerate neighbourhoods, and strengthen local economies. There are considerable opportunities for restoring and enhancing the natural heritage in and around the built environment.

SNH is supportive of current work to develop guidelines for quality assessments of greenspace, such as that being conducted by Greenspace Scotland, and we recognise the importance of involving local stakeholders in setting quality objectives for local spaces within the context of national guidelines. Existing, new and revised guidance on community engagement (e.g. National Standards for Community Engagement, Communities Scotland 2006), on Open Space, Masterplanning, and the Natural Heritage (e.g. “New housing, settlement expansion and the natural heritage”, SNH 2005), provide a strong basis for ensuring that all new and improved open spaces within the built environment are well-sited and well-designed.

SNH has experience of working with stakeholders at local and national level on supporting the implementation of guidance on open space, greenspace, community engagement, and the natural heritage. Our experience indicates that efforts to document and disseminate good practice through training events and through publications can play a significant role in helping to focus on the quality of place/open space and greenspace within deprived neighbourhoods . We would encourage further efforts to be made on building capacity within the planning and development sectors and on developing and using new tools, such as planning guidance and advice.

Question 31. Do you have suggestions for approaches that are not resource intensive and that include stakeholders?

SNH has considerable experience of working in partnerships at national and at local level in urban and rural Scotland to design, create and manage high quality open spaces.

In particular we support the work of Greenspace Scotland, local greenspace bodies, and community-based voluntary organisations to create and improve greenspaces. We are also involved in exploring the role that Community Planning can play in supporting and directing community involvement in environmental improvements. Evidence to date indicates that local communities can play a significant role in managing public open spaces, although the nature of their role will depend on local circumstances, and will be complemented by the role of public bodies. Further efforts are required on exploring and piloting approaches aimed at enabling communities to manage their local open spaces; community gardens and allotments may provide useful models.

Question 32. Do you agree that the lead role (and recipient of any resources) to undertake this work should be open to a range of stakeholders?

There are many opportunities for taking new approaches to managing public open space, including direct management by local communities. A strategic regional dimension may also be required to support management by local communities and to encourage integration between projects and with regional strategies.

SNH experience has shown that the best approach may differ between projects in accordance with the specific circumstances, including the capacity and wishes of the local community. The influence of these parameters on finding the best local solutions are likely to require further investigation. In some cases it is likely that efforts will be

required to develop the role of the planning authority as the body responsible for ensuring that appropriate arrangements and resources are in place for the proper management of public open spaces.