

SPP Review - Priorities for Change

Contact Details

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Policy Ideas

The review is of the SPP as a whole - please consider connections and tensions between policy subjects

Policy Subject/s: Housing 1/4 - Housing Requirements

What works?

Paragraph 68 - The recognition of functional housing market areas (HMAs) is important and should be retained. The recognition that HMAs will rarely coincide with local authority boundaries is essential particularly in strategic development planning areas where a wider housing market system is in operation usually dominated by a city. It is also important to recognise the HMAs are likely to be different for different tenures and this has implications particularly at the SDP level.

What doesn't work?

Paragraphs 67 - 69 - SPP and relevant housing publications seek close integration and alignment between Local Housing Strategies (LHS) and development plans (HNDA, SDP, LHS and LDPs). The introduction of HNDA was clearly seen as an important means to achieving this aim. This has, however, not been fully achieved in the first GCVSDP because there are inconsistencies between HNDA Guidance 2008; LHS Guidance 2008, SPP 2010 and PAN 2/2010. SPP would benefit from providing greater clarity on the integration and alignment of these interrelated processes in an SDP area and this clarity should be incorporated in the relevant housing publications.

Why?

Paragraphs 67 - 69 - Strategic Housing Need and Demand Assessment (HNDA) was introduced to SPP in 2010. The cross-arching nature of the HNDA means that there are several policy and guidance documents relevant to it, HNDA Guidance 2008; LHS Guidance 2008, SPP 2010 and PAN 2/2010.

The process and timeline associated with an HNDA that produces outputs for the LHS and Local Development Plan (LDP) can more readily be put into practice sequentially in a unitary authority: HNDA - LHS - LDP. However, in the city regions, where a SDP is required, the alignment of the HNDA, SDP, LHS's and LDP's is inevitably more complex and with knock on consequences in terms of HNDA outcomes delivery timescales a lengthier timeline.

Policy and Guidance advises that *housing requirements* are identified based on the HNDA, ~~these~~ these figures are then taken through the LHS process to identify *housing supply targets*. The LDP's (at MIR stage) can then translate the housing supply targets into *housing land requirements*. This sequential process is challenging to achieve in an SDP area. There is a clear expectation in Scottish Planning Policy 2010 Paragraph 69, Planning Advice Note 2/2010, paragraphs 6, 12 and 13 and Box 1, and Local Housing Strategy Guidance, paragraphs 19, 21 and 33, that 'alignment' should occur between the processes of preparation of the HNDA, the LHS and both Strategic and Local Development Plans. Problems with the integration and alignment of housing strategies/development plans were identified as a key issue by the Scottish Government in its 'Housing Need and Demand Assessment: Stock-take and

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Guidance Refresh: Presentation and Speaker's Notes' The Scottish Government Centre for Housing Market Analysis, August 2011 and greater clarity is essential on these matters. - Direction/clarity is sought to guide SDP areas in this process.

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In the context of the current SPP the timeline for the publication of housing related documents in the GCV area is set out below and highlights the inconsistencies in the integration and alignment of policy/guidance:

- the SDP is required for submission 4 years from approval of the previous SDP and is programmed for submission in May 2016;
- the LDPs are required for submission every five years and should be programmed for the next round of submissions in 2018/19;
- SDPs have to assume 2 years between SDP approval and LDP adoption;
- the LHS's are required for submission every five years and therefore, under the current timeframes, are not programmed for submission in 2016/17.

If the requirement is for SDPs to include housing supply targets based on the outcomes of HNDA2 -in the SDP MIR, which is due for consultation in January 2015, would require work on the housing supply targets through the LHS to be undertaken in Summer 2014. This is, at the earliest, 2 years before LHS submission is required and it is unlikely that local authority housing departments are anticipating being at this stage of the LHS development at that time. This is a major issue and potential impediment to having integration and alignment for HNDA2 and SDP2. Consideration needs to be given to this matter and clarity would be welcomed in revised guidance on how to address and reconcile the inconsistencies in currently in housing policy/guidance regarding the publication of these interrelated documents.

The GCVSDPA would welcome the opportunity to be involved in any review of these related housing documents and furthermore would welcome a meeting with the Scottish Government and strategic development planning authorities to explore solutions to this issue which is pertinent to city regions.

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

Incorporated as part of the Why? Section above.

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Policy Subject/s: Housing 2/4 - Housing Land

What works?

Paragraph 70 - The recognition that wider strategic economic, social and environmental policy objectives should also be taken into account when determining the scale and distribution of the housing requirement and the housing supply target for an area is important and should be retained. Local understanding of the impact these factors have on the delivery of housing allows pragmatic decisions to be made about realistic delivery of housing for an area whilst achieving desired policy outcomes.

Paragraph 72/73 - These paragraphs provide clarity about the housing land requirement timescales and should be retained. It necessarily recognises the different requirements for SDPs and LDPs and this could usefully be applied to other elements of the SPP in relation to housing e.g. the alignment between the HNDA, LHS, SDP and LDP. Elements of this paragraph are also considered under 'What doesn't work'.

Paragraph 75 - The recognition of the importance of the housing land audit should be maintained. Elements of this paragraph are also considered under 'What doesn't work'.

Paragraph 76 - It is considered that this paragraph which acknowledges the delivery of housing does not rely solely on the allocation of appropriate land in the development plan is clear and helpful and should be retained.

What doesn't work?

Paragraph 66 and 71 - It is considered that the term 'generous supply' has caused significant ambiguity adding unnecessary uncertainty into the system and should be clarified/defined or removed.

Paragraph 66 and others - There is inconsistency in the terminology used in SPP relating to housing requirements. SPP would benefit from providing clarity on this matter.

Paragraph 72 - This paragraph states that the SDP should identify housing requirements to be met in LDPs. It is considered that this paragraph should also refer to the importance of identifying housing requirements at the appropriate functional housing market area to be consistent with the HDNA.

Paragraph 74 - Clarity is sought in regard to one local authority meeting the requirements of another local authority.

Paragraph 75 - In determining the effectiveness of sites in the housing land audit the remit of the planning system should be made clear particularly in relation to matters relating to financial viability.

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Why?

Paragraph 66 and 71 - The term 'generous supply' has caused significant ambiguity adding unnecessary uncertainty into the system leaving strategic and local authorities to take a balanced judgement on what they view as 'generous'. That judgement clearly must be taken in the context of wider policy considerations and other factors impinging on housing market circumstances. It is considered that clearer guidance should be given on what is meant by this particular term

Paragraph 66 and others - There is inconsistency in the terminology used in SPP relating to housing requirements. Policy and Guidance advises that *housing requirements* are identified based on the HNDA, these figures are taken through the LHS process to identify *housing supply targets*. These *housing supply targets* are taken forward through the LDP to identify *housing land requirements* by housing market area (in a SDP area where the HMA crosses local authority boundaries, the housing land requirements are identified at the SDP level). The distinction between these different stages is crucial and the terminology should be applied consistently throughout all housing documents to avoid confusion. This could be addressed by making a distinction in SPP between what is required for SDPs and what is required for LDPs in regard to housing. It is also considered that clarity is required on the definition of housing supply targets and their relationship to housing requirements.

Paragraph 72 - To be consistent with the HNDA Guidance and paragraph 68 of SPP it is considered that this paragraph should also refer to the importance of identifying housing requirements at functional housing market areas. In the GCV area the functional housing market area system operates across local authority boundaries (as evidenced from long term monitoring and analysis, this operates on a 'three tier' level across the GCV Housing Market Area). In order to meet the stipulations of these paragraphs these figures have to be disaggregated to give local authority figures for the LDP. The consideration of housing requirements in a SDP area is undertaken and monitored at the strategic level, the role of the LDP is to ensure it has sufficient effective land supply to meet the requirements set out in the SDP. This important distinction is not clear in SPP between housing requirements in an SDP and an LDP and therefore clarity is required on this matter.

Paragraph 74 - Clarity is sought in regard to one local authority meeting the requirements of another local authority if there are serious local environmental or infrastructure constraints which cannot be resolved to allow development within the life of the plan. In GCV the functional housing market areas cross local authority boundaries as the evidence for, monitoring and analysis clearly shows, as indicated above. Mobility between each of the three tiers varies and land can be allocated as required within these tiers. This paragraph implies that an evidence base is not required in certain circumstances and some clarity on this matter would be appreciated. This issue is at the heart of strategic planning and requires to be addressed as an integral part of city-region planning.

Paragraph 75 - Related to the point about 'generous supply' above is the determination of the effectiveness of sites in the housing land audit. It should be recognised in SPP that in terms of financial viability there are limitations to the influence that Planning can have on 'effectiveness' if this is the main determining constraint to delivery. In the current economic circumstances, allocating additional sites as an alternative to sites already deemed effective in the housing land audit, is unlikely to significantly increase the delivery of new homes as many of the factors impinging the property market relate to debt financing and the availability of affordable mortgages rather than the availability of land.

SPP should acknowledge the factors limiting the deliverability of houses that are outwith the remit of the planning system. This issue is explicitly recognised by the Chief Planner in his letter ('Providing an Effective Supply of Land for Housing') to Heads of Planning of 29 October 2010, relating to the provision of an effective supply of land for housing, Paragraph 6: "Where a planning authority has a 5 year supply of effective housing land but the impediment to developing that site is the general availability of mortgages or low level of demand from purchasers then there will be little if anything to be gained by releasing additional sites."

The detail of undertaking a housing land audit is contained within PAN 2/2010. This document was not issued for consultation at the time of release and will presumably be reviewed in light of the SPP review. We would welcome the opportunity to be involved in any review of PAN 2/2010 and in particular would

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like to make contributions relating to clarifying some of the criteria for effectiveness and the types of tenure that can contribute towards affordable housing.

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

Incorporated as part of the Why? section above

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Policy Ideas

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Policy Subject/s: Housing 3/3 - Location and Design of New Development

What works?

In terms of paragraphs 77 - 85 achieving high quality designs that meet current policy agendas is supported and these paragraphs cover a wide range of detailed design and policy issues. Detailed comments will no doubt be provided by Local Planning Authorities that deal with detailed policies in Local Development Plans and Supplementary Guidance, and Development Management which are not considerations for this authority.

Paragraph 81 - The recognition of urban capacity studies in planning for housing is important and should be retained. Urban capacity studies enable authorities to assess potential for housing beyond the effective period contained in the housing land audit. As the balance of effective and non-effective supply has shifted since the economic downturn it is important to have a full understanding of the medium to long term development potential in an area when preparing a SDP or LDP.

What doesn't work?

However, additional planning requirements, recent new examples include district heating systems and energy efficient design considerations, if not well managed, can become burdens on the planning system and introduce delays. Additionally, new design requirements and policy agendas impact on development costs and can affect development viability.

Why?

Complexity, lack of consistent national guidance, lack of buy in from development industry, impacts on development costs.

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

Where appropriate, detailed and explicit guidance on these requirements should be provided at a national level to ensure that Planning Authorities receive planning applications that are well constructed and which do not then require to be renegotiated to meet new design or policy agendas.

The impacts on development costs require to be acknowledged and clear and consistent national guidance provided for the benefit of the development industry at early stages in the development process.

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Policy Ideas

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Policy Subject/s: Housing 4/4 - Affordable Housing

What works?

Quota style policies supported by PAN 2/2010, combined with additional public funding, have delivered increases in the land available for and the delivery of affordable housing in recent years.

What doesn't work?

Notwithstanding the above even where an HNDA does justify a quota larger than 25%, it has been argued by the development industry and land owners that development costs and viability are adversely affected. Other than for publicly owned land, allocation of sites exclusively for affordable housing, is generally not acceptable to the development industry and land owners and rarely leads to delivery without protracted negotiations through LDPs and Examination processes.

Paragraphs 86 - The types of affordable housing listed are more relevant to measuring the delivery of affordable housing or contributing to an affordable housing policy than informing how the requirement for affordable housing, as required in SPP and HNDA Guidance, is to be projected over the Plan period.

Why?

Complexity, lack of consistent national guidance, lack of buy in from development industry, impacts on development costs.

Paragraphs 86 - In the context of the HNDA it is considered that the types of affordable housing listed in this paragraph and PAN 2/2010 may be more relevant to measuring the delivery of affordable housing or contributing to an affordable housing policy than to informing how the requirement for affordable housing is to be projected over the Plan period.. There is limited availability of data on this sector, with the exception of the social rented sector, and some of the 'types of tenure' listed can be temporary tenures (i.e. shared equity for 10 years before reverting to market housing) or cannot be separated from mainstream market housing ('entry level housing for sale') and therefore it is not possible to project housing requirements for these types of affordable housing. The types of affordable housing listed in SPP and PAN 2/2010 should be considered in the context of the HNDA Guidance and the new HNDA Tool.

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

Greater clarity around the term 'affordable' in the context of housing tenure would be helpful which could

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meaningfully be addressed in a revised PAN 2/2010 (The GCVSDPA would welcome the opportunity to be involved in any review of PAN 2/2010 and in particular would like to make contributions relating to clarifying the types of tenure that can contribute towards affordable housing).

If the SPP is to continue to refer to the ability of planning authorities to allocate sites exclusively for affordable housing or to increase quota policies beyond 25% where justified by a HNDA, then further national policy guidance is required to support such policy responses, given that currently such approaches will be challenged by the development industry and land owners. Logically, this might include removal of the ability to challenge such approaches where justified by an appropriate HNDA

The impacts of affordable housing policies on development costs, require to be acknowledged and clear and consistent national guidance provided for the benefit of the development industry at early stages in the development process. The potential implications of any approach on the issue 'effectiveness' requires to be carefully considered.

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Policy Ideas

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Policy Subject/s: Whole Document

What works?

The SPP being a single document works well.

What doesn't work?

If the revised SPP's focus is to be on two matters, i.e. sustainable economic growth and place making then any new SPP requires to be clearly structured along those lines as the current siloed topic based approach doesn't currently support that focus. The revised SPP should therefore not be constrained by the structure/form of the existing document.

There is a lot of repetition and imbalance between topic areas in the current SPP with a mix of background information, context guidance and policy spread throughout the document. The new SPP should be policy focused only.

One subject area which it is considered is not adequately reflected in the current SPP is that of the role of Green Networks and this is something which should be addressed as part of the review given its key role in supporting sustainable economic growth and place making.

The current SPP does not address the inherent tensions between particular topics and the objectives of the Scottish Government e.g. *sustainable economic growth v climate change, generous supply of housing land v regeneration, renewable energy v environmental capacity*. A clearer and more integrated SPP which addresses these cross cutting issues will provide clearer guidance to all stakeholders on how such matters are to be addressed and will assist in removing uncertainties in the planning system in general.

Why?

See above.

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

Any review of SPP should in the first instance seek to support the Government's aspiration for a plan-led system. It should also aim to

- be less narrative;

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- be more graphical;
- be concise with policy statements clearly articulated; and,
- avoid the use of terminology which is open to wide interpretation.

The focus of the SPP review on sustainable economic growth and a greater emphasis on place making is welcomed. However it is considered that sustainable economic growth, an overall Scottish Government objective, is not covered by just one planning policy area. In this respect the structure of the document will be very important particularly in setting out clearly the various planning policy areas which contribute to meeting this objective. The same observations are made in respect of place making.

Another consideration should be to focus the document on delivering the Scottish Government's national outcomes. The revised SPP should consider what are the truly 'national' planning issues and set the policy context accordingly. This should also link clearly to the revision of the National Planning Framework.

Other considerations which should inform the review include a consideration of the implications of Scotland changing demographics and a need to support the existing urban form, particularly the role and function of the city regions.

The Appendix below sets out from a Glasgow and the Clyde Valley Strategic Development Plan perspective some of the key considerations/solutions that should be taken forward in the revised SPP.

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Appendix

SPP Review
Subject Policy Areas
Issues for Consideration
Economic Development <ul style="list-style-type: none">• important for SPP to reflect the Scottish Government's Economic Strategy and how the planning system can support the key sectors.
Town Centres and Retailing <ul style="list-style-type: none">• the outcomes of the Scottish Government's current national review of town centres;• a recognition that the retail sector has dramatically changed over the last couple of decades and that shopping patterns have changed as a consequence;• the growth in the night time economy in many town centres;• recognise the importance of employment across civic, administration, office functions in terms of generating 'footfall';• the increase in pressure on store dependant operators as a result of internet shopping and the impact of large retail centres;• decline in the physical fabric of town centres;• the importance of trying to retain a quality retail offer in relation to retaining and attracting investment;• the traditional role of town centres has changed as many are no longer dominated by a diverse quality retail offer. The SPP should continue to focus upon town centres however it requires to recognise their evolving roles and functions within local communities rather than solely on the link between town centres and retail.
Housing <ul style="list-style-type: none">• the lessons learned from the first round of Housing Need and Demand Assessments including the need for alignment, including timescales, of policy and guidance between SDP's, LDP's and LHS's;• the need to retain clarity of timescales for housing land requirements;• the need for clarity in the distinction between housing requirements set out in the SDP and the housing supply targets to be delivered through LDP/LHS;• a need for greater clarity with regard to the term 'affordable' housing;• the continuing need to recognise functional HMA's and that these are different for the different tenures;• the introduction of the term 'generous supply' of housing land without it being explicitly defined has caused significant ambiguity adding unnecessary uncertainty into the system;• recognition that in terms of financial viability there are limitations to the influence that planning can have on 'effectiveness' if this is the determining constraint to delivery.
Rural Development <ul style="list-style-type: none">• current SPP approach is considered appropriate.
Coastal Planning <ul style="list-style-type: none">• need to reflect the Marine (Scotland) Act 2010 with clarity required on the interface of marine

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planning with spatial planning.
Fish Farming <ul style="list-style-type: none">this is not a strategic issue for the Glasgow and the Clyde Valley area.
Historic Environment <ul style="list-style-type: none">current SPP approach is considered appropriate.
Landscape and Natural Heritage <ul style="list-style-type: none">current SPP approach considered appropriate. The current designations work well at the SDP level.
Surface Coal Mining <ul style="list-style-type: none">current SPP approach is considered appropriate.
Open Space and Physical Activity <ul style="list-style-type: none">need to recognise the role of Open space audits and strategies in terms of informing Green Network planning.
Green Belts <ul style="list-style-type: none">within Glasgow and the Clyde Valley, Local Development Plans identify inner and outer green belt boundaries. At the recent GCVSDP examination, the reporter agreed with this approach. This should be reflected in the revised SPP.
Transport <ul style="list-style-type: none">stronger reference should be made to active travel;greater integration with transport policy documents like the Scottish Government's National Transport Strategy and Strategic Transport Projects Review. Project.
Renewable Energy <ul style="list-style-type: none">clearer policy and guidance is required in defining the role and required response of planning in order to support the development of renewable energy recognising the additional burdens that this puts on the planning system and the potential impact on the viability of development.
Flooding and Drainage <ul style="list-style-type: none">need to recognise the role of River Basin Management Plans, emerging Local Flood Risk Management Plans and the Green Network.
Waste Management <ul style="list-style-type: none">the current SPP approach is considered appropriate, albeit limited insofar as the land use planning context requires to be readdressed at a higher level through a review of the National Planning Framework, the Zero Waste Plan and PAN63 Waste Management Planning.
Minerals <ul style="list-style-type: none">current SPP approach is considered appropriate.
Onshore Oil and Gas Operations <ul style="list-style-type: none">current SPP approach is considered appropriate.
Communications Infrastructure <ul style="list-style-type: none">clearer policy and guidance is required in defining the role and required response of planning in order to support the development of the fast changing demands of communications infrastructure.