

Scottish Planning Policy and housing: proposed policy amendments consultation.

Question 1

Removal of “the Presumption” from the SPP through the proposed changes is welcome since it will reduce the scope for developers successfully to bring forward development sites that do not form part of the Local Development Plan, and which would otherwise be rejected for breaching Plan policies.

A return to a plan-led rather than a Court-led development system is desirable on grounds of economy, democracy and inclusiveness.

Question 2

We strongly support the clarification of the definition of Effective housing land supply and, especially, the additional wording proposed for paragraph 123. Our community has experienced the damage that can arise from the exclusion of parts of the effective land supply from consideration due solely to programming assumptions [give local example if possible].

We consider that the proposed changes are appropriate and necessary in all market conditions and should not be regarded merely as meeting a temporary situation (although the current situation certainly underlines the need to make the changes urgently).

Question 3

We agree that the proposed changes to paragraph 125 are likely to remove the scope for the variety and types of calculation that are currently being adopted and that this is a desirable outcome under all circumstances and not only in current conditions.

We support the use of the Housing Supply Target rather than the Housing Land Requirement in calculating the extent of the forward 5 year effective land supply. The programmed completions that emerge from the Housing Land Audit will be based on expected demand over the period and so will not (and should not be expected to) include the element of “generosity” that forms part of the Housing Land Requirement.

We agree that using an averaged rate of delivery over the life of the plan is more appropriate than the residual/compound approach being simpler and not relying on past completion figures that are often of very uncertain accuracy.

We support the removal of the second sentence of the current paragraph 125 and its replacement with the proposed text. We agree that a shortfall should be considered to be a material consideration but that it should not be the only or even the most important consideration when deciding whether or not to approve proposals designed to make good the identified shortfall.

We suggest that there may be merit in introducing wording which would allow the relevant planning authority, in consultation with affected communities and potential developers, a period of time in which to bring forward their own proposals for rectifying the identified shortfall before the shortfall becomes a material consideration. This would allow a more considered approach and allow the planning authority a pro-active rather than a reactive role in identifying the most appropriate site(s) to meet the shortfall.

Question 4

We are not aware of any probable impact on types of development other than housing.

Question 5

We agree that fuller impact assessments should not be required.

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