
HOMES FOR SCOTLAND RESPONSE TO PLACES, PEOPLE AND PLANNING

This is an extract from Homes for Scotland's formal response to Places, People and Planning: The Scottish Government Consultation Paper on the Future of the Scottish Planning System. Our full response is available on the [Homes for Scotland website](#).

KEY MESSAGES: THEMES, PROPOSALS AND OMISSIONS

A strong unifying thought emerging from the home building industry is that the Scottish Government has selected a set of key themes and objectives that cannot be equally serviced by the detailed proposals that appear in the paper. In particular we believe many of the proposals would work against the objective of delivering more homes.

In terms of the package set out across the four sections of the paper, we would highlight the following thoughts and key concerns.

Making Plans for the Future

Scotland has a plan-led system. Support for this is a key point of unity amongst planning review participants. The desire to simplify and strengthen development planning is a good one, but the consultation paper does not address the major current threat to the plan-led system: **Plans are failing to fulfil their remit on planning for housing**. Across Scotland, plans are falling far short of housing supply targets, meaning housing need and demand can only be met if a significant number of unallocated sites can successfully be negotiated through the development management system. We are seeking a more **collegiate approach to development planning** at all levels, with home builders playing a stronger role in the preparation of plans, reflecting the major role that they already play in their implementation. We also want greater leadership from the Scottish Government with **clear housing targets set out at the national level** and greater monitoring of the way local planning authorities play their part in **meeting housing need and demand in full**.

People Make the System Work

Communities should be helped to develop a **better understanding of the purpose of the planning system and the way it functions**, including the importance of **each community playing its part in meeting Scotland's housing need and demand**. We can best achieve this by giving them a more central role in the preparation and monitoring of development plans, not by hiving them off to make their own plans whilst local planning authorities continue to get on with theirs. **We should not fragment the Scottish planning system through the introduction of local place plans**. The Scottish Government and Local Planning Authorities should be more open and **positive about the important role unallocated sites play in meeting housing need and demand**. Measures should not be introduced which give the wrong message that unallocated sites can't make a positive contribution to plan implementation. Plans are more than the sum of their sites, they contain broader policy objectives and targets that will not be achieved through site allocations alone. The important and independent role that DPEA reporters play in the planning system also needs to be better communicated – and must be retained. **Placing the burden of major housing appeals on local politicians would likely result in fewer new homes being permitted and delivered**. This would not serve the national interest, and would make the planning system more adversarial, less delivery-focussed and less effective.

Building More Homes and Delivering Infrastructure

The package of ideas in this section **does not recognise the key barriers to the delivery of homes and infrastructure**. Current operational weakness limiting the ability of the industry to deliver more homes include the closed nature of **Housing Need and Demand Assessments and performance monitoring**, the loophole allowing LPAs to **set targets which are lower than need and demand**, a generally **poor understanding of the generosity allowance and the limited impact of the SPP presumption in favour of sustainable development**. There must be a clear commitment at national and local levels to **closing the gaps between housing need and demand and housing supply targets, and between housing supply targets and the delivery of new homes**. This can only be achieved by shifting the focus from simply identifying potential development land on paper to **responsibly considering the extent to which housing targets are expected to be matched through delivery**, and identifying instances where **a new approach or other interventions are needed**. In relation to infrastructure, the proposals do not overcome the two key barriers of (a) **insufficient commitment to delivery** by all local authorities and partners and (b) **insufficient overall funding** being committed. The consultation paper recognises the fact that **infrastructure is the most significant challenge for planning at this time** but goes on to say that **this is not the right time to create an infrastructure agency at the national level**. It is silent on how we can otherwise achieve the required seismic change in timely infrastructure delivery.

Stronger Leadership and Smarter Resourcing

No matter how the planning system is configured, what it achieves in practice will be greatly affected by **the cultural approach of all involved**, and the strength of **leadership at national and local levels**. We hope to see a clear national strategy on embedding a positive and enabling culture, supported by strong leadership. This should sit alongside any programme of legislative and policy reforms and Homes for Scotland would be happy to contribute further to this area of work. **Greater use of multi-party or round-table discussions** would help, as would the collegiate approach to development plan making and monitoring which we have promoted throughout this paper. Whilst it is clearly **vital that the planning system is properly resourced**, this cannot be achieved solely through fees and other charges applied to applicants for planning permission. Planning is an activity that takes place because it is in the public interest. There is, and there will continue to be, a **significant reliance on the private sector to deliver the new homes and other developments that Scotland needs**. It is essential that the Scottish Government takes a step back to **review the overall cost burden** that the proposals in this consultation paper (and elsewhere) will have on the applicant and developer community. If there really is an ambition to increase housing delivery, **the costs of applying for and implementing planning permissions must remain viable**.

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