



## Your details

Please complete the following details below. It is essential that we have a name and the name of any organisation if you are responding on their behalf. Contact details would be helpful if we need to follow up on any points.

Name:	Craig McLaren
Organisation:	RTPI Scotland
Email address:	<a href="mailto:Craig.mclaren@rtpi.org.uk">Craig.mclaren@rtpi.org.uk</a>
Phone number:	0131 229 9628
Would you like us to keep your response confidential:	No

## Consultation questions

Below you will find response boxes for each of our consultation questions. If possible, please base your response on answers to these questions.

Some questions may be somewhat irrelevant to your interests, in which case please feel free to answer as many or as few as you like. And please feel free to offer other comments if you think they are relevant to our remit. There is space at the end for you to do so.

You can skip to the section(s) that you wish to respond to through the links below:

1. [Wellbeing](#)
2. [Housing and investment](#)
3. [Housing and the economy](#)
4. [Housing and welfare policy](#)
5. [Housing and the environment](#)
6. [Housing and health and education](#)
7. [Housing and community regeneration](#)
8. [The Private Rented Sector \(PRS\)](#)

## **Section 1: Our assessment of the importance of housing for wellbeing in Scotland**

**Q.1.** Has our assessment of housing and wellbeing missed any important benefits and, if so, which benefits and what is the evidence for this?

RTPI Scotland agrees with the Commission that housing has an important impact on the wellbeing of people and communities in Scotland.

As mentioned in our Covering letter supporting this submission, RTPI Scotland is currently working to initiate discussion, particularly from a planning perspective, on planning for housing, and focussing the debate on the important roles that planning can play, and what we need in place to do this. We have set out ten propositions to start discussion. These are not necessarily the Institute's policy, rather a provocation of debate and discussion to shape a short policy paper in spring 2015. Our covering letter lists these propositions in full, however we point out proposition 8, listed below:

***"8. We need to deliver places, not just houses***

*We need to move thinking and policy away from thinking of housing in terms of units and numbers so that it takes a more holistic view of homes as part of communities and places. As part of this there is a need to see value of a home being measured beyond a simple market value and look to the strength of its contribution to a community and the economic, social, health and prevention benefits."*

RTPI Scotland strongly believes that planning has an important role to play in wider Scottish Government objectives of wellbeing and housing. Planning is and should be a strong driver of economic recovery and the key way in which to deliver the homes we need for people in Scotland, but this must not be development at any cost, but the right development in the right place. We acknowledge the Commission's eight types of wellbeing, and suggest that planning and the wider placemaking agenda have important roles to play in facilitating the delivery of homes, places and communities that deliver these eight types of wellbeing.

We support the Scottish Government publication of "Creating Places" (the policy statement on architecture and place for Scotland) in 2013, setting out the Scottish Government's commitment to placemaking. Furthermore, the Scottish Government in partnership with Health Scotland is currently developing a "Place Standard" to "support the delivery of high quality places in Scotland and to maximise the potential of the physical and social environment in supporting health, wellbeing and a high quality of life". RTPI Scotland supports the 'place agenda' and the development of this Place Standard as key ways to deliver the quality of homes that we require to support the wellbeing of the people of Scotland.



## Question 1 continued...

RTPI has recently published a “Planning Horizons” paper “[Promoting Healthy Cities: Why planning is critical to a healthy urban future](#)”. The paper recognises that the majority of people now live in cities, and therefore the state of our cities and towns will determine the health and wellbeing of most of the world’s population in the twenty-first century. This research paper stated:

*“In the twenty-first century, we need to develop a new urban agenda focused on healthy placemaking for all. Planning in the broadest sense – from development management and infrastructure to the location of health and community services – can play a central role in creating environments that enhance people’s health and wellbeing. We need to develop more integrated strategies for healthy placemaking, gather greater intelligence on the social and economic determinants of urban health to guide decisions and investments, reform and strengthen institutions to develop systems of governance that urban populations need, and involve more professions and communities to promote healthy cities.”*

**Q.2.** Has our assessment exaggerated any of the benefits of housing for wellbeing and, if so, in what respects and what are your reasons for saying this?

No comment

## Section 2: Does Scotland invest enough in housing?

**Q.3.** Do you agree with our assessment of the current position on investment in housing?

RTPI Scotland agrees that there is need for investment in housing. We need to accept that there is a need for housing growth, there is an increasing need for housing and this must be met. This will need to be embedded within the culture of organisations with politicians and officers recognising the big picture. It may also challenge approaches to community involvement and engagement in housing developments and the resistance that can arise towards proposals.

National Planning Framework 3 aims to facilitate new housing development, and this is strengthened by Scottish Planning Policy which sets key policies on directing the right development to the right place, and creating “high quality places by taking a design-led approach” promoting the positive purpose of planning to create better places, and adding to the wellbeing of people within these places.

See response to Q5 below and Cover letter for further information.

**4.** Do you agree with our brief assessment of current policy on investment in housing?

There is a need to recognise the value of investing in housing, but within the context of investing in places. Housing is a key aspect of a community but we need to take approaches that look beyond the housing unit to see how it fits with, and supports the creation of successful places for people which bring economic, social and cultural benefits.

Too many of our approaches are silo-based, and organised through specific funding streams and initiatives focussed on specific areas of work, rather than taking an holistic view of that value and impact on communities and places. We need to change this. Community Planning provides the opportunity to do this through more effectively making linking it with planning processes and with shared outcomes for communities. We are currently undertaking work examining how best to do this and would be happy to share this with the Commission as its findings emerge.

(See also response to Q25 below)



**Q5.** Do you agree with our suggestions for further action in the area of  
i  
n

RTPI Scotland notes that the Commission suggests setting national and local targets for overall house building requirements. This is something that we raise within Proposition 1 of our 10 Propositions to support Planning for Housing. There is a question as to whether there is a need, or desire, to introduce national and/or regional housing targets.

It must be acknowledged that the private sector currently delivers the vast majority of all new housing in Scotland. However if we are to achieve a significant increase in housing numbers in coming years, the private sector alone cannot deliver sufficient numbers. This raises the question of how to support the private sector to deliver more homes.

Propositions 4, 5 and 6 are particularly relevant to this question, suggesting ways to support delivery of housing.

***“4. We need to better link the vision with a delivery programme***

*We need bridge the gap between planning vision and the delivery of appropriate development. This means looking at how we can better match resources to planning vision (and vice versa) and move from development plan to investment plan. It asks about the State’s role to as enabler and investor and whether it has the powers and interventions needed to make this happen. It opens the debate on how engaged the public sector needs to be in assembling land and whether there a delivery models that should be explored such as development corporations. And it asks questions of the current Section 75 model.*

***5. We need to more effectively link development and infrastructure***

*We need to make the case for, and show the value of, linking investments in infrastructure with development, and vice versa. This asks if infrastructure policy, allocation and investment has a long term vision with proper use of master planning rather than ad hoc developments. It means exploring if local authorities need to/ can take on investment from developers and make more effective use of it borrowing powers. And it prompts the question on how we can have upfront and upstream infrastructure and use this to minimise risk for developers, investors and communities.*

***6. We need to create certainty and share risk and reward***

*Perceived risk in housing development is restricting borrowing, investment and development. Given this there is a need to examine who is best placed to take risks and how risk can be shared. It also asks how proactive, upstream planning can provide more certainty for investment and if local authorities can work with the private sector through Joint Ventures, Local Asset Back Vehicles, and funding models such as Tax Incremental Financing, Prudential Borrowing, Bonds and underwriting. “*



## Question 5 continued...

We acknowledge the longer term suggestion of supporting the Scottish house building industry through action on land supply. The RTPI policy paper "[Delivering Large Scale Housing: Unlocking Schemes and Sites to Help Meet the UK's Housing Needs](#)" (September 2013) sets out 15 practical recommendations to overcome barriers to delivering large scale housing which may come into play as part of the Commissions deliberations on what more can be done in the medium and longer term to improve investment in housing and deliver the homes we need whilst pushing for increased quality and delivering places, not just houses, under the headings of community engagement, land, infrastructure, finance, and leadership and governance. Particularly relevant to the question of what more could be done in the medium to longer term to improve investment in housing are the recommendations on land, infrastructure and finance:

### **“Land**

*Recommendation 4: There needs to be public access to information on who owns land and who owns options on land*

*Recommendation 5: Local authorities should take a larger role in land assembly, for example by the use of existing powers of compulsory purchase*

*Recommendation 6: Share risks around potential future land uplift in land values more evenly between local authority, developer and landowner so as to bring sites to market now*

*Recommendation 7: Government departments and agencies should be required to dispose of their surplus land holdings in a way which takes account of the wider community value rather than maximising the capital receipt, and to do so with alacrity*

*Recommendation 8: In view of the longer lead-in times involved, central government should incentivise large scale housing schemes, for example through financial mechanisms or national planning policy.*

### **Infrastructure**

*Recommendation 9: Link together infrastructure expenditure, policies and planning with policies and planning for housing in order to unlock potential sites, for example through budgetary processes or guarantees against future income streams*

*Recommendation 10: Local authorities should be empowered and encouraged to use existing or innovative funding solutions and utilise central government support through existing funding streams or policies. This could involve local infrastructure funding or forms of devolved pooled resources*

### **Finance**

*Recommendation 11: Local authorities, infrastructure providers and government agencies should develop means to pool departmental and European resources in order to deliver the infrastructure which supports housing schemes*

*Recommendation 12: Where funding isn't available, central government should consider underwriting a certain proportion of the site investment"*

**6. Do you have any other suggestions that we have not mentioned in relation to investment in housing?**

See response to Q5 above



**Section 3: Getting a better fit between housing and the economy**

**Q.7.** Do you agree with our assessment of the current position regarding housing and the economy? What more would you add?

RTPI Scotland agrees that housing is a major part of the economy, and we further suggest that planning is and should be seen as a key driver of sustainable economic growth and recovery, a positive and proactive process.

A key outcome of Scottish Planning Policy (published in June 2014) is “*A successful, sustainable place – supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places*”. It goes on to state that planning has a key role in promoting strong, resilient communities with opportunities for people to contribute to a growing economy

**Q.8.** Do you agree with our assessment of the current situation of UK Government policy with regards to the housing market and the economy?

See response to Q7 above, and cover letter

**Q.9.** What are your views about the five areas of policy reforms suggested here?

No comment



**Section 4: Getting a better fit between housing and welfare policy**

**Q.10.** Do you agree with our assessment of the current position regarding housing and welfare benefits? What more would you add?

No comment

**Q.11.** Do you agree with our assessment of the current situation of government policy at UK levels and the possible outcomes post-referendum? What more would you add?

No comment

**Q.12.** What are your views about the medium term policy options presented here? What other ideas and issues strike you over this time frame?

No comment

**Q.13.** Do you agree that we have a unique opportunity to consider longer term policy options over the next key period in Scotland's history? How do you respond to the options proposed here? Are there other options that should be considered?

No comment

## Section 5: Getting a better fit between housing and the environment

**Q.14.** Do you agree with our assessment of the importance of housing to the environment?

RTPI Scotland agrees that housing has the potential to make an important contribution to minimising the use of resources for the wellbeing of future generations. Planning not only for housing, but the whole place, plays an important part in this. Planning can:

- Shape places so as to help secure radical cuts in greenhouse gas emissions. This requires the location and layout of new development to be planned to deliver the highest viable energy efficiency, including the use of decentralised energy; reduce the need to travel, particularly by private car; secure the highest possible share of trips made by sustainable travel; and enhance green networks
- Actively support and help to drive the delivery of renewable and low-carbon energy.
- Shape places and secure new development so as to minimise vulnerability and provide resilience to impacts arising from climate change, and to do so in ways consistent with cutting greenhouse gas emissions.
- Ensure that local communities are given real opportunities to take positive action on climate change, in particular by encouraging community led initiatives to reduce energy use – for example, by securing land for local food sourcing and securing more renewable and lowcarbon energy.
- Increase sustainable transport use, local transport solutions and active travel

**Q.15.** Do you agree with our brief assessment of current policy on housing in relation to the environment?

See answer to Q14 above.

**Q.16.** Do you agree with our suggestions for further action in the area of housing and the environment?

See answer to Q14 above.

**Q.17.** Do you have other suggestions that we have not mentioned in relation to housing and the environment?

No comment

## Section 6: Housing and Health and Education

**Q.18.** Do you agree with our on our assessment of the importance of housing to health and education?

See response to Q19 below and cover letter.

**19.** Do you agree with our brief assessment of current policy on housing and health and education?

We refer to the RTPI's Planning Horizons research paper "[Promoting Healthy Cities: Why planning is critical to a healthy urban future](#)" which looks specifically at the link between planning and health in its widest sense, which includes planning for housing. The paper recognises that the majority of people now live in cities, and therefore the state of our cities and towns will determine the health and wellbeing of most of the world's population in the twenty-first century. This research paper stated:

*"In the twenty-first century, we need to develop a new urban agenda focused on healthy placemaking for all. Planning in the broadest sense – from development management and infrastructure to the location of health and community services – can play a central role in creating environments that enhance people's health and wellbeing. We need to develop more integrated strategies for healthy placemaking, gather greater intelligence on the social and economic determinants of urban health to guide decisions and investments, reform and strengthen institutions to develop systems of governance that urban populations need, and involve more professions and communities to promote healthy cities."*

**Q.20.** Do you agree with our suggestions for further action in the area of housing and health and education?

See cover letter and response to Q19 above.

**Q.21.** Do you have other suggestions which we have not mentioned in relation to housing and health and education?

See cover letter and response to Q19 above.

## Section 7: Housing and Community Regeneration

**Q.22.** Do you agree with our on our assessment of the importance of community regeneration?

RTPI Scotland supports the statement by the Commission that housing has an important part to play in regenerating communities suffering from major social and economic problems. We suggest that this must be in an integrated way, looking not only at housing itself but in an integrated approach to the whole place, considering the economic, social, cultural and economic issues of the community to be addressed.

We believe that a properly-resourced planning system, working within the correct framework, is key to realising ambitions for sustainable development, economic growth and successful places. Such a system will highlight pressures for change, identify opportunities and build appropriate safeguards. It will provide the long-term, pro-active vision for Scotland through integrating and future-proofing development. And it will allow, and indeed encourage, people across Scotland to have a say in the future of their places.

The Institute believes that there are four cornerstones of planning which will help to achieve Scottish Government's regeneration objectives, namely:

- ensuring that the planning system has a central role in providing visionary, integrated, cost-saving and democratic approaches to shaping the future of Scotland and, therefore, to regeneration;
- supporting the planning system in its key role of delivering outcomes such as sustainable development, economic growth and successful places, so as to achieve regeneration;
- providing the right framework for planning at national, regional, local and community levels to deliver sustainable change through regeneration; and
- providing adequate resources to deliver good planning, to ensure that a skilled and experienced workforce exists, now and in the future, with the expertise to bring forward further innovative approaches to regeneration.

The Scottish Government has a wide range of roles to play in supporting regeneration, and these should be articulated more clearly so that its partners are clear about what it can do to help them. Key to this is the integration of different strands of Government policy so that long-term sustainable approaches to regeneration are delivered.

**Q.23.** Do you agree with our brief assessment of current policy on community regeneration?

See comments on Q22 above



## Q.24. Do you agree with our suggestions for further action in the area of community regeneration?

In submissions to Scottish Government on the then Community Empowerment and Renewal Bill in February 2012 and September 2012, RTPI Scotland suggested ten tests that should be met in taking forward the Community Empowerment Bill, which we still feel are good tests for taking forward the Bill and are relevant to the Commission's suggestions on taking forward medium term actions in the area of community regeneration:

1. It allows for a clearly stated and democratically agreed vision of national spatial priorities, including meeting needs for housing and infrastructure, and addressing the challenges of climate change;
2. It takes a broad view of sustainable development that requires all involved to place economic, social and environmental sustainability on an equal footing;
3. It does not assume that the Government's agendas for sustainable economic growth, for meeting targets for reducing emissions and increasing renewable energy, for social inclusion and housing delivery will be achieved simply because there is the freedom of choice to do so;
4. Any duties placed on local government and others are clearly defined, are resourced and are enforceable where necessary;
5. Any rights given to communities are not token rights unsupported by resources, expertise or democratic challenge;
6. The understandable desire among communities for immediate investment in local facilities does not prejudice longer term investments to meet larger-scale needs such as hospitals, waste facilities and transport infrastructure;
7. Approaches to planning within neighbourhoods not only serves to provide what local communities desire, but also allows for what wider communities need;
8. In exercising powers over the future of their areas, communities accept and fulfil the responsibilities attached to doing so and community groups recognise that they will need to consult as well as be consulted;
9. It gives an equal opportunity for all communities to be involved in shaping their own futures, including those communities and groups whose engagement has often been neglected and have been served by Planning Aid for Scotland in the past and we hope will continue to do so in the future; and
10. It does not hamper the ability of RTPI members to continue to provide a professional, independent, un-biased, evidence-based service to all those involved in, and affected by, planning.



**Q.25.** Do you have other suggestions which we have not mentioned in relation to community regeneration?

RTPi Scotland is currently exploring the issues of better linking community planning and spatial planning, looking at the disconnect between processes, outcomes and priorities of community planning and spatial planning, how we can address this, and what the benefits of a greater connection between processes might be for all parties.

We are currently looking for responses from interested parties on the potential opportunities and barriers to better linking the two processes, and any good practice examples. We would be happy to share any emerging recommendations with the Commission (due to be completed in spring 2015) if this would be useful.

## **Section 8: Do we need a more robust private rented sector?**

**Q.26.** Do you agree with our views on the need for a more effective private rented sector which can make a greater contribution to meeting housing needs?

No Comment

**Q.27.** Do you agree with our brief assessment of current policy on the private rented sector?

No comment

**Q.28.** Do you agree with our suggestions for further action in the private rented sector?

No comment

**Q.29.** Do you have other suggestions which we have not mentioned in relation to the private rented sector?

No comment

**Do you have any further comments in relation to the Commission on Housing and Wellbeing's consultation paper?**

No comment