

# Response ID ANON-MX9V-CYBS-5

Submitted to **Housing Sector Plan**

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## Introduction

### 1 What is your name?

**Name (optional):**

Robbie Calvert, Policy and Practice Officer at RTPi Scotland

### 2 What is your email address?

**Email (optional):**

Robbie.calvert@rtpi.org.uk

### 3 What is your interest in the Housing Sector Plan?

**Answer:**

Identifying new development opportunities for where housing should be located is a key function of the planning system. As statutory consultees and collaborative partners, SEPA are key stakeholders in the process by which we shape place. The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 2300 members in Scotland and a worldwide membership of over 25,000.

## Housing Sector Plan

### 4 The proposed scope of the Housing Sector Plan includes the entire life cycle of homes, and covers both existing stock and new build housing. Do you agree with this scope?

Agree

**If not, why?:**

Whilst the diagram in Figure 2 captures the lifecycle of homes with the appropriate scope, the involvement of planning may have been understated. 'Planning and design' follows on from site selection, yet the planning system is a critical domain by which sites are selected, be it through the preparation of Local Development Plans, Strategic Development Plans and the National Planning Framework.

### 5 The proposed vision for the Housing Sector Plan is described in Section 2. Do you think it sets the right level of ambition for the sector?

Agree

**What would you change? :**

Whilst highlighted later in the document (p15). RTPI Scotland would like to see the inclusion of the National Planning Framework (NPF) in the list of key plans and programmes, which SEPAs vision be aligned with. The NPF sets out a long-term vision for the development of Scotland. It is described as the spatial expression of the Scottish Government's Economic Strategy - with a focus on supporting sustainable economic growth and the transition to a low carbon economy, therefore tying directly into the proposed sector vision.

RTPI Scotland welcomes the commendable ambitions as set out in the 'One planet place'. Beyond aligning outcomes with the Scottish Government's housing outcomes to achieve the vision, RTPI Scotland would welcome explicit mention of collaborative working with the planning system. This would reflect the prime responsibility and role planning is entrusted with for place-making as a means of coordinating built environment actors in the housing sector, to delivering long-term public value to society.

### 6 Section 3 broadly sets out the context and captures the key issues faced by the housing sector in Scotland. Is there anything vital missing, or that should be changed?

Yes

**If yes, what?:**

On page 9 the importance of a "[...] an efficient and effective planning system [...]" is correctly stated in regards to the housing sector. RTPI Scotland would further added the wording "properly resourced" – Our research has shown planning departments across Scotland have suffered disproportionately from budget cuts over the last few years. There has been a 25% decrease in planning staff between 2009 and 2017, while over the same period their planning service budgets were cut by 40%.

We welcome the commitment set out to ensure that the housing sector plans align with sectors plans for strategic infrastructure (transport and utilities), and water and wastewater. RTPI Scotland would further welcome specific reference to alignment with strategic planning, which links policy areas for housing, employment, transport, energy, water, waste and digital infrastructure. Particularly with this sector plan it would highlight the importance that long term planning and adaptation issues in the housing sector be continually appraised at a regional level to allow for effective catchment-scale planning for flood risk and landscape-scale planning for green infrastructure.

**7 Figure 6 describes the main environmental impacts that may arise through the life cycle of housing and the supply chain. Have we got these right?**

Yes

**Please outline any other impacts that concern you which are not included:**

**8 Figure 7 summarises the main organisations that influence and are influenced by the people in the sector that we regulate. Bearing in mind that the list is not exhaustive, is anyone vital missing?**

Yes

**If yes, who?:**

RTPI Scotland would wish to see the Planning and Environmental Appeals Division (DPEA) included in the list of regulators and Heads of Planning Scotland (HOPS) in the government section. The addition of UK wide and English government and agencies would be important to reflect collaboration on cross-boundary issues, including river catchments.

## **Housing Sector Plan**

**9 To help inform how we could best address compliance we want to understand what is preventing full compliance in the housing sector. (a) Thinking about the examples of non-compliance described in Section 5, are there specific barriers we could resolve as a regulator?**

Not sure

**What are they?:**

No comment

**10 To help inform how we could best address compliance we want to understand what is preventing full compliance in the housing sector. (b) Which part(s) of the lifecycle of homes present(s) the biggest challenges and/or opportunities in the context of environmental regulation?**

**Please provide your thoughts here:**

A major opportunity is presented on p21 to "Develop clear guidance on what we want to achieve in developments with respect to space for the water environment, blue-green infrastructure to deliver effective surface water management and pollution control, river basin planning objectives and wider multiple benefits". To ensure compliance is frontloaded into the planning system it is crucial that guidance is developed intimately with development management teams who assess these elements of an application and planning enforcement teams, who bring about enforcement action if SUDS schemes, basins, swales if not built in accordance with approved drawings.

**11 Addressing non-compliance: (a) Do you think the actions listed under 'How we are going to address non-compliance' are the right interventions to solve compliance in the sector?**

Strongly agree

**If not, what actions do you think need to be taken? :**

**12 Addressing non-compliance: (b) Are there specific areas of non-compliance that are likely to respond better to the use of our enforcement measures than others?**

Not sure

**If yes, what are they? :**

No comment

**13 The aspirations identified under Water, Materials, Energy and Land are our initial thoughts for how we could help the sector to go further. Do you think we have identified the right aspirations?**

Agree

**What changes do you suggest? :**

RTPI supports the aspirations set out in this section. It is important that a joined-up working approach is taken with the UK Minerals Strategy, which although initially billed as a strategy relating to England, has an objective of engaging with relevant bodies in devolved administrations at a later date.

**14 Do you think the potential actions listed in the table under 'What actions are we going to take?' will help us achieve the plans outcomes?**

Strongly agree

**What changes do you suggest? :**

In particular RTPI Scotland welcomes the intentions of SEPA to engage with the newly formed Infrastructure Delivery Group. We also welcome intentions to identify improvements in flooding and planning work, by collaborating closer with developers and promoting good practice. RTPI Scotland would like to highlight

the recent establishment of the Partners in Planning website ([www.partnersinplanning.scot](http://www.partnersinplanning.scot)) as a useful place to disseminate any guidance and good practice.

**15 Do you agree with our proposed approach to outcomes and the outcomes identified in Section 6?**

Agree

**If not, why? :**

We agree with the proposed outcomes, although we would urge the additional inclusion of a placemaking outcome, with the aim of supporting the delivery of high quality environments in new housing development. This would more clearly deliver aspirations set out in the 'one planet place' section.

**16 Do you have any other comments or thoughts on the draft plan?**

No

**Please provide your thoughts here:**