

improving living in scotland



**HOMES FOR SCOTLAND RESPONSE TO
NATIONAL PLANNING FRAMEWORK 2 - DISCUSSION DRAFT
14 APRIL 2008**

Homes for Scotland is the representative body for the private home building industry in Scotland. Homes for Scotland represents the interests of over one hundred and thirty member organisations who provide 95 of every 100 homes built for sale in Scotland and we have a rapidly expanding membership of professional and other service businesses engaged in our industry.

Homes for Scotland has been involved in an ongoing 'conversation' with the Scottish Government during the modernisation of the planning system. We are grateful to the Scottish Government for taking time to present the second National Planning Framework through the series of workshops and we welcome the opportunity to comment on this consultation document.

Comments

1. While not taking issue with the broad objectives of NPF2, we believe that it does not provide sufficient clarity in relation to the geography of future investment in the infrastructure necessary to support future development. We believe that NPF2 lacks detail on how the Scottish Government's long term objectives will be achieved.

This is particularly important with regard to investment in transport systems and utilities which will be necessary if the private sector is to be in a position to take long term investment decisions in respect of new development proposals.

2. Whilst the draft NPF2 goes some way to setting out infrastructure priorities and investment programmes at paragraphs 188 and 238, Homes for Scotland believe that this document should go further. NPF2 must give clear unambiguous guidance in respect of major public sector investment decisions to ensure that the private sector can invest with confidence.
3. NPF2 sets out nine national developments. In addition to these nine national developments NPF2 must also provide guidance on regional and sub national proposals. Strategically important regional investments, for instance projects identified in Structure Plans or Transport Strategies will require to be processed and co-ordinated across Local Planning Authority boundaries.
4. Paragraphs 150 –165 of NPF2 refer to the spatial strategy and city region developments but do not offer a means of identifying future development locations or even priority areas of search. If the Scottish Government has ambitions to guide and target future investment decisions in respect of housing it is imperative that NPF2 sets out regional housing targets. This is particularly true in respect of the scale of housing in settlements to be promoted or expanded under the Scottish Sustainable Communities Initiative.
5. Homes for Scotland welcome reference to the Scottish Government's discussion document 'Firm Foundations' at paragraph 169 – 172, in particular the aspiration to increase housing supply to 35,000 per annum by the middle of the next decade. We support this objective and the links made to SPP 3, which seeks to ensure a "*generous supply*" of land for future housing. NPF2 should provide further direction in a planning policy context that will guide Development Plans. The NPF2 should encourage Local Authorities to contribute to the Scottish Government's aspiration to increase the amount of new housing by setting growth targets across Scotland.

We would welcome any future opportunities to contribute to the consideration of the finalised NPF2 document, and to the drafting of the detailed action programme that will be published in due course.