



Further Information for the LGHP Committee on National Planning Framework 4

Planning Democracy campaign to ensure that decisions about how Scotland's land is developed are fair, inclusive, locally accountable, and promote just outcomes driven by community needs rather than profit. We believe in democratic control of land and the ways it is developed.

We congratulate the Minister and the Committee on what we believe is the most progressive planning strategy since devolution. We really support the fact that this document values, not just economy and growth, but our climate, nature and well being. We very much welcome this approach.

Research on Housing, Climate and Biodiversity

In order to strengthen the delivery of the NPF4 we believe that it is necessary to be clear about what development is needed. We appreciate difficult decisions need to be made, but our planet's future depends on it.

New housebuilding, the infrastructure required and the subsequent use of new homes will all generate emissions, however well they are designed. Our evidence to the LGHP Committee quoted this [research](#), which explores how housing policies address unmet housing need, and are compatible with national biodiversity and decarbonisation goals.

The research estimated that 12,519 ha of farmland will be lost per year to urban development in the UK. This equates to an average loss of biodiversity of approximately 0.04 species per hectare or an average 5.7% loss in species richness in the areas being developed.

Even the most ambitious carbon reduction scenario that researchers ran which included decarbonising newbuilds and existing stock, still used **60% of the cumulative carbon budget** required to remain within 1.5 °C limit.

We are **very glad** that NPF4 has removed SPP 2014 policies that have been subject to challenges on housing land calculations and hope that it is enough to reduce the number of appeals made. It is imperative that the new emphasis on climate and biodiversity policies are strong enough to give planners confidence to make decisions that will be upheld against further challenges in appeals.

MATHLR is not compatible with climate and biodiversity targets.

The overly generous MATHLR currently allocates too much land for housing, and this undermines biodiversity and climate targets. Addressing the climate emergency means that we have to **provide for housing need in the most carbon efficient manner possible.**





The MATHLR is still considered to be a minimum, the LHLR can be increased even further by the local authority. **But why?** The MATHLR has already got a huge inbuilt generosity/flexibility contingency.

If the MATHLR or LHLR gets too high then local authority will struggle to deliver affordable and sustainable housing and developers will likely pick off most profitable greenfield sites from the overly generous allocations and ignore the harder to develop, more sustainable, sites.

We are extremely concerned with two points that Homes for Scotland's made during their evidence

1) we disagree that we need "a fix" that would allow more land to be brought into the housing land allocation if allocated sites aren't delivering fast enough

2) we disagree that if build out is faster than expected, we should allow the addition of land to the housing supply that is not already identified in the LDP.

The implication is that, without these additions, the housing crisis won't be addressed, as the completions targets won't be met.

We believe these two suggestions undermine the plan led approach and threaten other policy aspirations.

Delivery Programme

We request further action on enabling local authorities to assemble and compulsorily purchase land at existing land values. We ask that this urgently becomes the focus of Government policy, in order to address the housing crisis through public led planning, rather than focussing on allocating generous amounts of land for the private sector to build new homes, that have a minimal number of affordable and no social housing.

Retaining existing buildings, retrofitting, refurbishing and upgrading homes seems to be supported elsewhere, but we would like it to be clearer that contributions to meeting housing need from existing buildings should result in reductions in the land allocated.

There also needs greater emphasis on enabling housing delivery from a more diverse number of housing providers, such as developers from the community sector.

With regard to the 'applicant stakeholder group' which is to be established to feed into the High Level Group on Planning Performance in order to identify priority areas for action. We would like to further discuss options on how to determine priority areas for action and monitoring and improving performance **for non-applicants.**

MATHLR: Minimum All Tenure Housing Land Requirement

LHLR: Local Housing Land Requirement

