

Planning and the Housing Emergency - Delivery Plan

November 2024

The challenge

The Scottish Government is focused on addressing the national housing emergency. Our planning system has a key role to play in facilitating the delivery of more homes across Scotland.

We have taken a progressive and positive approach to planning reform in Scotland to support the delivery of the right homes in the right places, helping to tackle the housing emergency. Our national planning policies are clear about what good development looks like, including contributions to sustainable development and wider place-making objectives. With the right support and investment, planning can and should actively enable good quality development.

Evidence shows that the housing emergency has emerged as a result of a number of factors. In Scotland, planning permission has been granted for many more homes than are currently being built. The Competition and Markets Authority, in a [report](#) published earlier this year, identified that since 2014, the average number of homes given planning permission in Scotland was 29,000 annually, and that this significantly exceeded housing land supply targets, and indeed the number of house starts (average 19,892 per year) and completions (average 19,160 per year), over the period as a whole. This evidence on supply raises questions about how sites that already have planning permission, which in total are estimated to represent more than 164,000 unbuilt homes across Scotland¹, can come forward to delivery.

To further understand the specific challenge for planning, we have reviewed in more detail the land supply in the Glasgow and Edinburgh city regions², based on data gathered by local authorities in their latest housing land audits and compiled by the Improvement Service, as well as commercially available construction data on activity on sites. This suggests, as a broad estimate, that across these regions land for around 114,000 homes has been granted planning permission and not yet completed. Of these, 38,000 units had started work on site. In addition to this, there was also allocated land for a further 64,000 homes that had yet to receive planning permission.

Notwithstanding the above, we of course recognise that there is scope for improvement in the planning system in Scotland, something that the CMA report also identified noting that the process was not predictable for housebuilders, and can be costly, lengthy and complex. It set out a number of recommendations for improving planning. Whilst planning delays can arise for a number of different reasons, statistics on decision-making timescales show that there is scope to make the system more effective, particularly at a time when new homes are urgently required. We have been clear that more capacity within planning authorities, as well as greater efficiency, could have the most significant, positive impact on the ability of the planning system to play a more active role in co-ordinating services and facilitating delivery. There is also scope for streamlining practice to make best use of available resources.

¹ This is based on data from 24 local authorities, covering around 85% of the national population. This represents the remaining capacity of land with planning permission in the latest available Housing Land Audit information.

² The areas include the former Clydeplan and SESplan areas: Glasgow, West Dunbartonshire, East Dunbartonshire, North Lanarkshire, South Lanarkshire, East Renfrewshire, Renfrewshire and Inverclyde; and Edinburgh, West Lothian, Midlothian, East Lothian, Fife and the Scottish Borders respectively.

Our response

Planning can help to enable development by providing a high quality and responsive planning service, backed by professional expertise. To unlock the potential of planning as a lever for investment in our economy, the system needs to operate as efficiently as possible, and planning authorities must be properly equipped to deliver a good quality service. By acting now to tackle delays and to better understand and respond to delivery challenges, planning can provide solutions to common issues, which may be perceived as 'blockers' including decision-making timescales, complexity, and challenges to delivering development on site.

Everyone involved in planning has a role to play in supporting a national push to deliver more homes, including affordable homes where they are required. Some actions will require the Scottish Government and planning authorities to prioritise action on housing, whilst others will depend on changes within the development sector. Agencies and other consultees can also work together to ensure that they do not inhibit rapid progress in this area.

We expect to see a focus on addressing this emergency in decision-making on both plans and applications.

The Scottish Government will do all it can to ensure the actions set out here are progressed at pace over the coming 6 months, focusing on the following key objectives:

- **Policy:** a strong and consistent planning and policy framework for investment.
- **Delivery:** actively enabling and facilitating development.
- **Efficiency:** an end-to-end approach to improving the efficiency of the system.
- **Capacity:** investing in capacity with access to excellent professional skills and expertise.

Policy: A strong and consistent planning and policy framework for investment.

We have reformed Scotland's planning system to strengthen a plan-led approach to development, providing greater consistency and certainty for all stakeholders. National Planning Framework 4 (NPF4) sets out a strong vision for the future and includes a single set of national planning policies which is now being applied to all planning decisions. The strategy is designed to support the delivery of more quality homes. National planning policy is clear that planning applications will be supported in principle, where they are on sites allocated in local development plans.

NPF4 signals a move away from past practice which allowed for additional land, which is not supported by plans, often in more easily developed, greenfield locations, to be released if insufficient land for housing was available. This policy (known as 'the presumption in favour of sustainable development') was the subject of much debate, conflict, time and delay in planning. In practice, and contrary to what the policy originally intended, low levels of housing completions – built to local market conditions – were often used to justify building on additional land which had not been planned for.

Our policies are now designed to incentivise developers to build out their sites more quickly. Other policies also strongly support the provision of affordable homes that meet diverse needs. This will ensure that homes are built in planned locations which will better meet people's needs and avoid building in unsustainable costs for the longer-term.

However, we recognise that the introduction of NPF4 has been a significant change for the Scottish planning system, and whilst most policies are now widely understood, there is still work to be done to support planning authorities and applicants work effectively with the new approach.

Over the next 6 months we will:

1. Continue to work with planning authorities to ensure that **national planning policies** are applied consistently across Scotland. This will provide more clarity and certainty and help to reduce delays in decision-making times. Further guidance on key topics, including climate, flooding and biodiversity, will also be issued.
2. **Identify mechanisms to stimulate the build-out of housing sites** with planning permission, in line with a plan-led approach. Our policies are designed to achieve this, but we are aware that market circumstances are limiting progress and that build-out has been significantly lower than permissions for a number of years. We will therefore look to identify mechanisms to support our policy and stimulate build-out at a faster pace to ensure more homes are delivered faster. We are open to working with the UK Government on this as a shared objective.
3. Work with stakeholders to promote good practice in demonstrating **community benefits from new housing developments**. It is important that development proposals are informed by local information and views – this can help to achieve better outcomes, to manage impacts and to secure buy-in, thereby helping applications to move through the system more smoothly. We will also publish new guidance on effective engagement with communities, to help involve people early, including by linking with local place plans.

Delivery: Actively enabling and facilitating development.

Scotland's planning system is open for business. We want to take a 'Team Scotland' approach to development, and in particular the delivery of more homes, building on existing relationships and practices. Our clear ambition is to use the planning system to make Scotland the most attractive part of the UK for investment. As part of this we will take forward any opportunities we have to provide more support to planning authorities to help unblock applications which are in the system, regardless of the reasons for any delays. We also recognise that delivery challenges do not stop once a project has been granted planning permission. Many different interests need to come together to support the implementation of projects on the ground.

Over the next 6 months we will:

4. Establish an action-focused **Housing Planning Hub** to provide brokerage support for major housing developments which have stalled in the system. As a starting point for this we have asked partners to assemble information on stalled sites and will draw on similar work already undertaken to inform the work of the Housing Investment Taskforce as well as wider data on the land supply. Stalled sites are primarily those which already have planning permission but have not yet been built out. We will also identify where, there is scope to help those which have yet to receive permission to proceed through the process. This support could include, for example, bringing planning authorities together with applicants and key agencies to identify any barriers which require additional information or action to overcome. We will also contact investors to identify where additional proactive advice or support for negotiating the planning system is required. The approach will be designed to support, rather than replace, the expertise of planning officers in local authorities. We will only do this work where there is agreement, by all parties, that it can add value.
5. Work with **SME housebuilders** to better understand the challenges they face with the planning system and identify actions to support them. We recognise that the planning system can appear complex and so we could, for example, develop tailored guidance to specifically support SMEs to navigate the process.
6. Help early adopters to put in place **Masterplan Consent Areas**. These grant planning permission up-front, de-risking the planning process for investors. They have significant potential to make the planning process simpler, including by aligning planning permission with other consents. We are keen to explore this with both planning authorities and potential developers.
7. Help planning authorities to bring forward new style development plans including a pipeline of **deliverable housing land** and delivery programmes. Supporting this, we will publish new guidance on housing land audits, to help build a clearer picture of the availability of housing land across Scotland. We will also work with planning authorities and partners to more fully understand the sufficiency of land already allocated in existing local development plans.
8. Continue to work with our advisory group and other stakeholders to progress **compulsory purchase reform** ahead of a consultation in 2025. This has the potential to further empower local authorities and other partners to proactively facilitate the delivery of homes, for example by redeveloping vacant and derelict land and refurbishing empty properties.

Efficiency: An ‘end-to-end’ approach to improving the efficiency of the system.

Structural changes have already been made to the planning system which aim to improve performance. Much of this work has been led by the National Planning Improvement Champion, funded by the Scottish Government, over the past 14 months. However, we know that practice and timescales can vary, and that planning has increasingly taken on board additional and often complex information. Rather than further changes to the system which would add uncertainty and further delay, we are focused on supporting improvements to performance and practice.

Over the next 6 months we will:

9. Continue to support the **National Planning Improvement Champion** to roll out a new framework for performance improvement across all planning authorities building on the work that has been done already.
10. Work with planning authorities and applicants to increase the use of **processing agreements and pre-application advice**. These provide clarity over timescales and increase confidence in the process.
11. Provide advice on further streamlining and consistency in **validation of planning applications**. This will be informed by the work of a short-life working group on proportionality in the planning system which is also looking for opportunities to ensure that information requirements to inform planning assessments are appropriately scoped.
12. Work with Heads of Planning Scotland to develop advice on **standardised planning conditions**.
13. Work with Heads of Planning Scotland to encourage the use of a **standard template for Section 75 planning agreements**.
14. Work with Heads of Planning Scotland to identify and share best practice in **aligning various consents** required in addition to planning permission. We are aware that whilst planning has an important role to play, other services are also instrumental in unblocking the delivery of development proposals.
15. Stop work on the introduction of an **infrastructure levy**. Whilst infrastructure has a critical role to play in supporting placemaking, early engagement to inform the development of regulations suggests that the levy could add significant complexity to the system whilst offering limited benefits in terms of infrastructure funding and delivery, which could further undermine investor confidence at this time.
16. Highlight examples of **good practice** in development management – on the part of both authorities and applicants – and take steps to communicate these to provide guidance for practitioners.
17. Consider and engage widely on the potential scope for further **permitted development rights** which could support housing delivery in specific circumstances. Examples might include allowing the change of use of premises above shops to residential use as a means of stimulating an increase in town centre living.

We have identified key issues that need addressed at each stage of the planning process, together with solutions to address them, as illustrated below.

Issues:

Low take-up of processing agreements.

Varying capacity for planning authorities to support pre-application advice.

Issues:

Lack of clarity on information requirements.

Applicant timescales for providing information.

Varying application of guidance on validation requirements.

Issues:

Varying levels and types of information required.

Concerns about overstating requirements e.g. for Planning Permission in Principle.

Delays due to time and capacity of statutory consultees.

Issues:

Inconsistency / unpredictability of decisions and timescales.

Timescales vary and depend on capacity.

Schemes of delegation vary – committee cycles can slow decisions.

Issues:

Varying approaches to conditions.

SME concerns about scale / number of conditions.

Discharge of conditions / S75 obligations (including for affordable housing).

Issues:

Rate of completions determined by developer rather than planning authorities.

Information in land audits varies.

Pre-application

Application & validation

Assessment

Determination

Discharge of conditions, S75 Agreements

Starts & completions

Solutions:

Increase capacity and resources.

Encourage use of pre application services and processing agreements.

Introduce charges to cover service costs.

Solutions:

Develop and promote application of guidance to achieve more consistency / predictability and reduce delays.

Solutions:

Increase capacity and resources.

Share best practice on proportionality.

Provide access to expertise and work with key agencies.

HOPS leading work on alignment of consents.

Officer training and skills.

Solutions:

Increase capacity and resources.

Elected member training.

Solutions:

HOPS leading work on standardised conditions.

HOPS leading work on S75 template.

Solutions:

HFS supplying evidence on reasons for sites stalling.

Identify mechanisms to stimulate completions.

Consistent approach to housing land audits.

Capacity: Investing in capacity with access to excellent professional skills and expertise.

Finally, improvement in planning will only be possible if there is increased capacity and resources in the system. We consulted earlier this year on measures which might help to reverse the decline in planning services and are already taking forward a number of actions in this area. We intend to continue this work, including commitments set out in the Programme for Government, and will accelerate progress where possible.

Over the next 6 months we will:

18. Treble the number of **bursaries** offered to post-graduate planning students, and we are taking action to raise awareness of planning as a career. This is a direct route to add significant resource to the planning process.
19. **Increase fees** for planning applications, with an expectation that income generated will be re-invested in planning services. This is an investment in planning services which will pay a substantial dividend in the coming years if fee income is used to help to secure additional investment and development as a result of service improvements.
20. Work with the National Planning Improvement Champion, who is leading the **Hydrogen Planning Hub**, to identify where wider improvement work can help to also address some of the process and practice challenges with housing that applicants, such as SMEs, are experiencing.
21. Develop arrangements for **local elected member training**. Planning Aid Scotland is progressing work to develop a fuller package of support for local authorities on training, which will better support councillors to navigate the planning process and ensure greater consistency and uptake of training opportunities.
22. Launch a Scottish Government **graduate programme** that supports work-based learning and helps to address the pipeline of future planners. We will work with the education and skills sector to develop an offer that combines part-time employment with funded post-graduate qualification in planning which leads to chartered status.
23. Roll out a **co-ordinated skills and recruitment drive**. We are working with a wide range of partners to assemble a more coherent national skills campaign for professional planners, tackling areas which will have the most impact on moving planning towards a more positive tool for enabling development. We will also include support and input from associated built environment professions, recognising the diversity of skills required.

Taken together we believe that this package of measures will make a measurable difference to the performance of our planning system, supporting housing development across Scotland in response to the housing emergency.

	Action	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
	Policy								
1	Continue to support the application of national planning policies								
2	Identify mechanisms to accelerate build out of housing sites								
3	Support good practice in community benefits from housing								
	Delivery								
4	Establish a Housing Planning Hub								
5	Work with SMEs to support them								
6	Promote and support roll out of Masterplan Consent Areas								
7	Support pipeline of deliverable housing land								
8	Compulsory purchase reform								
	Efficiency								
9	Support the National Planning Improvement Champion								
10	Good practice: processing agreements / pre-application advice								
11	Validation / proportionality of information								
12	Standardised conditions								
13	Promote use of Section 75 template								
14	Share good practice in aligning consents / services								
15	Confirm that work on the infrastructure levy will stop								
16	Highlight good practice in development management								
17	Publish discussion paper on permitted development rights								
	Capacity								
18	Offer additional bursaries								
19	Increase planning fees								
20	Link with the Hydrogen Planning Hub improvements								
21	Elected member training preparation								
22	Launch graduate apprenticeships / appoint / in place								
23	Skills and recruitment drive								



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