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By E-Mail

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Comments by the Scottish Property Federation on the SESplan Housing Needs & Demand Assessment 2

Introduction

1. The Scottish Property Federation (SPF) is a voice for the property industry in Scotland. We include among our members; property investors, developers, landlords of commercial and residential property, and professional property consultants and advisers.
2. We welcome the opportunity to contribute to the SESplan Housing Needs & Demand Assessment 2 Consultative draft. As you are aware SPF had difficulties in accessing the on-line survey. However, we have prepared a generic word response that covers some issues not previously raised to allow you to add into the system.
3. Our members believe that the provision of sufficient housing across all tenures is crucial to a healthy prosperous and sustainable city region. A successful residential market is an important aspect of a thriving economic region. As well as delivering accommodation for employees and communities a thriving residential sector supports a range of trades and professions. Potentially, such a residential market can be an important source of investment income for larger scale investors.
4. A successful residential market is achieved through the allocation and delivery of a sufficient effective supply of marketable housing land in locations where people want to live and consequently developers want to build. There was real concern that the approach taken in SDP1 that was based on a strategy of not meeting housing need and demand would be repeated in SDP2 and therefore we welcome this consultation, which we believe is based on a better approach to the housing needs of the city region.
5. Our members would like to see buildings with flexible, viable and cost effective designs that can be adapted to suit changing aspirations and fluid markets in the current economic environment. Place making is supported around a good infrastructure (particularly transport) with access to a mixture of property uses including retail outlets, employment, leisure and ideally residential uses. They are of the view that this is important for both commercial and residential development with similar aspirations applying to both. The key will be to associate transport and development correctly. Mixed development of residential and commercial centres can also help (thus minimising private transport use).

6. Healthy lives are supported by the provision of sufficient housing for all. To ensure the area's housing land requirements are met SDP2 can direct housing towards marketable locations where people want to live and developers want to build. If housing land, which meets these criteria, is not allocated, there will be a shortfall in effective housing land supply and the housing land requirement will not be addressed.
7. The single greatest problem in today's housing market is lack of supply. Alongside the traditional focus on new house-building, affordable housing and social housing, the Private Rented Sector (PRS) could make a significant difference to the number of new homes provided in Scotland. The multiplier effect of new investment would bring enormous economic benefits and should, be actively encouraged and incentivised. As the growing PRS sector matures and investors are attracted to a stable and sustainable sector there may be benefit in considering PRS as a distinct planning use. In the short-term however, in order to attract investment and confidence in the sector, some flexibility in the planning field will be necessary.
8. Not only do we see the prospect of new build-to-rent as a valuable addition to the residential market but we believe it is also adaptable to meeting the needs and demands of many of the emerging criteria identified in the HNDA for SESPlan 2. There has been a recent move for older residents to sell up and move into quality serviced accommodation, possibly to support the home owning aspirations of a younger generation. There are also a greater proportion of single households and more transient households. The flexibility of the PRS could be a key contributor to meeting the demands of these groups of people.
9. Our members observe that attracting larger scale investment should take account of new build development for rental purposes where appropriate. This would introduce a scale of quality and choice that would support wider objectives such as additional supply and more energy efficiency housing. Larger scale landlords would also have costs to consider but generally may be in a better position to effect energy efficiency improvements and invest in property condition, than those who operate on a smaller scale.
10. Our members believe that it is not appropriate for the Development Plan framework to prescribe stringent design criteria. SDP2 could support residential development in sustainable locations and in particular those located within close proximity to railway stations.
11. The availability and deliverability of all infrastructures to enable sustainable patterns of settlement growth requires to be considered in the preparation of a City Region wide development strategy. Essential infrastructure considerations include, for example roads, education, drainage, broadband and availability of community facilities. In addition, access to amenities and leisure facilities will also be important considerations for both employers and households alike.
12. Across the SDP area, local authorities adopt different approaches to securing infrastructure associated with settlement growth and in particular housing development. The early stage preparation of SDP2 provides the opportunity to put in place a

framework of guidance which sets out requirements and delivery mechanisms across the constituent local authorities. A consistent approach should provide developers with increased certainty, speeding up delivery of development and supporting infrastructure. However, costs and viability will remain key issues and will need to be carefully considered in a situation of continued financial risk aversion. SPF will be pleased to contribute to the consideration of any proposals for such mechanisms. For housing developers, each site has a different set of requirements, for example transportation and education infrastructure are key requirements alongside water waste supply and drainage.

13. Our members are of the view that improving deprived areas is one important factor and have noted that the priorities omit the contribution that new greenspace associated with new residential development plays in improving the environment. SDP2 offers the potential to identify to promote its role.
14. The SPF would be pleased to answer any queries regarding our comments.

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