

Issue 12	Housing Land Supply	
Development plan reference:	Section 6 City Region as a Successful Sustainable Place - Enabling Delivery of New Homes	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Homes for Scotland (PP35_02) (PP35_03) CALA Homes (West) (PP43_02) Wallace Land Investments (PP45_02) Hallam Land Management (PP46_02) Stewart Milne Homes (PP49_01) (PP49_02) (PP49_03) Mr W Hill & Mr R Hill (PP53_01) (PP53_03) British Land Company plc (PP55_02)</p>		
Provision of the development plan to which the issue relates:		
<p>Housing Land Supply (pages 60-62) Schedules 9 and 10 (pages 61-62)</p> <p>This Issue is closely linked to both Issue 10 Selection of Growth Scenario and Issue 11 Housing Land Requirement.</p>		
Planning Authority's summary of the representation(s):		
<p><u>Homes for Scotland (PP35_02) (PP35_03)</u></p> <p>Given Homes for Scotland's views on the selection of a higher growth scenario (Issue 10), derivation of alternative Housing Supply Targets, addition of 25% for Affordable Housing and addition of 20% generosity to derive a higher Housing Land Requirement (Issue 11), they conclude that the land supply would be insufficient for the private sector.</p> <p>Within the representation form they refer to their Composite Representation Report (RSD11), the Turley's Report on Developing an Effective Deliverable Housing Strategy, Homes for Scotland – Clydeplan (RSD10), and targeted research on the location of housing in the central belt (RSD16), as additional supporting evidence.</p> <p>Homes for Scotland state that the Plan needs to call for a comprehensive review of all the land currently identified by the Local Authorities and Schedules 9 and 10 should remove the supply and shortfall/surplus columns. In support of this, paragraphs 6.66 to 6.71 need to be rewritten to reflect the fact that they are a point in time and that circumstance will inevitably change. Reference should be made to the need for Local Development Plans to verify the position at their time of writing.</p> <p>Paragraph 6.71 should not conclude that “no strategic scale additions to the supply are required”, as this pre-empts any work done by the individual Local Authorities in making their Plans in the future and would not be the case if the scenario changes</p>		

asked for in their Representation are agreed.

The disconnect between the amount of land identified by Local Authorities for housing development and the rate of private sector completions is recognised at para 6.29. However no explanation or solution is offered nor is this issue discussed under Housing Land Supply in paragraphs 6.66-6.71.

A more robust assessment of the land identified is needed and a proper view taken of the likelihood of it coming forward for social and/or private housing development within a 5-7 year period bearing in mind the time it takes to gain planning consent, ground conditions issues, how long the land has been identified with no development coming forward, delivery rates etc. Also consideration needs to be given to the types of homes that can be built and sold/rented in different housing market areas and how this meets the needs identified. There is no point in allocating land for city centre flats if it is mid-market family homes that are required.

The Plan should recognise the importance of demonstrating the viability and deliverability of the land identified by the Local Authorities for housing and require the robust testing of this land in order to resolve this clearly identified issue. This is in line with the paragraph 123 of Scottish Planning Policy (**RSD01**) and paragraph 55 of Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits (**RSD17**).

A new policy wording is suggested on Housing Land Supply that sets criteria for testing sites for viability and deliverability and for the length of time a site can have an allocation and not be developed before it is considered non-effective.

Cala West (PP43_02)

Wallace Land Investments (PP45_02)

Hallam Land Management (PP46_02)

The representees have asserted that Clydeplan Proposed Strategic Development Plan does not comply with Scottish Planning Policy. Accordingly replacement text is required in the Housing Land Supply section to guide emerging Local Development Plans (Local Development Plans) to reflect the policy requirements set out in paragraphs 117 to 119 of Scottish Planning Policy (**RSD01**).

Given the representees position with respect to Issue 10, Selection of Growth Scenario, they consider that the Housing Land Supply section of the Proposed Plan requires modification to reflect the High Migration Scenario representing sustainable economic growth in accord with the policy requirements of Scottish Planning Policy, paragraphs 117 to 119 (**RSD01**).

The Clydeplan Proposed Plan concludes that *“There is sufficient existing private land supply with generosity overall, albeit with a potential local shortfall in the Airdrie and Coatbridge housing sub-market area”* (paragraph 6.69). This is an assumption and prejudices the outcome for emerging Local Development Plans. Scottish Planning Policy requires Local Development Plans to *“provide for a minimum of 5 years effective land supply at all times... and ...in allocating sites, planning authorities should be confident that land can be brought forward for*

development within the plan period and that the range of sites allocated will enable the housing supply target to be met' (paragraph 119) **(RSD01)**.

Making assumptions regarding the effectiveness of the established housing land supply is not a role for the Strategic Development Plan (Scottish Planning Policy paragraph 118) **(RSD01)**.

Accordingly all reference to the quantum of future housing land supply required to be allocated through Local Development Plans is required to be amended in the Proposed Plan. The Strategic Development Plan needs to identify the scale which is the Housing Supply Target and Housing Land Requirement.

Stewart Milne Homes (PP49_01) (PP49_02) (PP49_03)

Stewart Milne Homes state that Background Report 7, Land Supply for Housing Monitoring Report 2013 **(RSD18)** shows that, while some of the Flagship Initiatives are beginning to deliver development – the River Corridor and Clyde Gateway in particular – other parts of the strategy are not delivering, notably Ravenscraig and the Community Growth Areas. They consider that this raises serious questions about why the same strategy which has not fully delivered twice should deliver now.

The Proposed Plan contains too much detail on housing land supply. The purpose of a Strategic Development Plan is to set out Housing Land Requirements, which must be delivered by Local Development Plans.

They assert that most of the authorities have failed to maintain a 5 year effective land supply and provide an assessment of their view on this matter. They consider that the Clydeplan area overall has a 2.5 year effective land supply.

They consider that most of the established supply is not effective and has never been tested for effectiveness or deliverability with the housing industry. Much of the future supply is assumed to come forward from the Urban Capacity Study. From Background Report 9 **(RSD19)** which summarises the Urban Capacity Study findings, the representees state that 32% of the established supply is not included in any audit and 64,000 units of supply programmed between 2020 and 2029, have not been subject to detailed testing or assessment.

Stewart Milne Homes' view is that Schedules 9 and 10 are not necessary in a Strategic Plan and that the plan should confine itself to setting out the Housing Land Requirements which should be delivered by the subsequent Local Development Plan. References to Schedules 9 and 10 should be removed from the text where they occur.

It is also important that the Plan's primary focus is on delivering the all-tenure requirement and reference is made to the modifications to the previous plan in support of this point.

Mr W Hill & Mr R Hill (PP53_01) (PP53_03)

Messrs Hill consider that a significant proportion of the housing land supply is not

effective for the delivery of housing in the short term and is unlikely to be capable of becoming effective in the long term.

They consider that the approach to the existing housing land supply is wholly unrealistic and in need of substantial review. The difficulty with the approach taken by Clydeplan is that it is relying on sites to deliver housing which are either effective or likely to become effective. They cite one example of this being the South Wishaw Community Growth Area (CGA), where it is now widely accepted that it is largely undeliverable, either in the short or long term.

Paragraph 6.69, implies that Clydeplan is directing Local Development Plans to allocate no further housing land until 2029, other than 290 houses in Airdrie & Coatbridge.

Their view is that it would be misguided and wrong for Clydeplan to precisely define the housing land supply at this stage in the planning process. Scottish Planning Policy requires Strategic Development Plans to identify the Housing Land Requirement, but does not require or imply that the Strategic Development Plan should identify the Housing Land Supply and thereby reach a conclusion on the amount of land to be allocated. Indeed, it is premature and unnecessary to do so.

In their view, therefore, not only are the estimates of housing supply in Clydeplan unrealistic but they should not be included in any circumstances.

British Land Company plc (PP55_02)

British Land plc is concerned that the release of previously identified greenfield sites, including the Community Growth Areas yet to materialise are being relied upon to provide the ambitious yet realistic levels of growth in a period that will stretch to 2036.

Modifications sought by those submitting representations:

Suggested Text deletions marked with ~~strikethrough~~
Suggested Text additions underlined

Homes for Scotland (PP35_02) (PP35_03)

Paragraphs 6.66 to 6.71 require to be rewritten to reflect the fact that they are a point in time and that circumstance will inevitably change. Reference should be made to the need for Local Development Plans to verify the position at their time of writing. In these paragraphs reference should be made to the fact that in spite of this apparent generous supply in some areas there is an overall undersupply if the amendments called for in our Representation on 'Planning for Enough Homes' (PP35_02) are made, that delivery is falling short and that the Local Authorities in making their plans should verify the viability and deliverability of the land currently identified. Reference should be made to the need for the Local Authorities to determine what type of housing their land supply is suited to and make sure that the right range and type of sites is included in their supply. Reference should also be made to the influence of market factors on these sites and recognise that there

are a large proportion of these sites in weaker housing market areas that will therefore not be delivered without some sort of subsidy. This section should also make mention of legacy sites and the proportion of these identified sites that were identified in the last plan and explain why it is legitimate that these should be carried forward or why they should be discounted.

Paragraph 6.71 should not conclude that “no strategic scale additions to the supply are required.” As this pre-empts any work done by the individual Local Authorities in making their Plans in the future and that there is likely to be a shortfall in housing land if the amendments are made that we call for in our representation on Planning for Enough Homes.

Schedules 9 and 10 should remove the supply and shortfall/surplus columns.

They suggest that a new policy could usefully be added here that sets criteria for testing sites for viability and deliverability and for the length of time a site can have an allocation and not be developed before it is considered non-effective. This should be based on the advice contained in Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits and include socio-economic / cost and values tests.

New Policy - Housing Land Supply

1) Local Authorities must identify and maintain a generous housing land supply. A generosity of 20% will be applied unless it can be demonstrated that there is no significant past under delivery.

2) In preparing their Local Development Plan and in undertaking annual housing audits each Local Planning Authority will assess all land currently allocated for housing and potential new allocations against the following criteria.

a) Can the whole or a portion of a site be developed for housing (i.e. residential units can be completed and available for occupation) within 5 years

b) Is the site free of constraints on the following basis:

i) ownership: is the site in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal;

ii) physical: is the site, or relevant part of it, free from constraints including designations, slope, aspect, flood risk, ground stability, access or contamination or can these be mitigated in a timely and affordable manner;

iii) deficit funding: is any public funding required to make residential development economically viable or deliverable committed by the public bodies concerned;

iv) marketability: is the site in an area where there is a strong enough housing market to support its development, can the cost of development be reconciled with local values, is there good prospect that housing for sale or rent will be taken up in this area;

v) infrastructure: is the site either free of infrastructure constraints, or can any required infrastructure be realistically provided by the

developer or another party to allow development to happen and what are the timescale for this.

c) Does the allocation of a site meet the identified housing need and can it deliver the right types of housing in the areas where there is established need/demand.

d) If the site is already allocated and hasn't delivered it must be discounted unless it can satisfy criteria (a, b & c) above.

3) If it can be demonstrated that an effective 5 year housing land supply is not in place and/or housing delivery rates fall below the levels required to meet housing needs within the Local Development Plan period the presumption in favour of development that contributes to sustainable development will apply and unallocated housing sites, subject to the restrictions placed on this in the Scottish Planning Policy, will be considered favourably for housing development.

Cala West (PP43 02)

Wallace Land Investments (PP45 02)

Hallam Land Management (PP46 02)

Various modifications to paragraphs 6.66-6.71 are suggested as follows:

6.66 For the purposes of strategic planning, it is essential to consider the longer term supply of land available to meet housing need and demand for the planning periods from the base year of 2012, to 2024 and 2029. The Local Authority Housing Land Audits (Background Report 7) estimate the programming of housing sites for a seven year period and together with an Urban Capacity Study undertaken in 2013 these two sources provide an estimate of the potential future housing land supply in the city region to 2037. In preparing Local Development Plans, each planning authority should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met, providing for a minimum of 5 years effective housing land supply at all times.

6.67 There is a an substantial established supply of land for housing in the Clydeplan area, with just under 118,000 all tenure units (social and private) programmed in the 2013–29 period and more than 34,000 additional units identified into the longer term to 2037. The land supply comprises committed sites where a start has been made (350 sites, 14,350 units), uncommitted sites with planning permission (520 sites, 35,000 units), sites in Local Development Plans (240 sites, 13,900 units) and other proposed housing sites (665 sites, 54,500 units).

~~6.69 Looking at the private sector land supply, there are almost 100,000 units to 2029 which will enable delivery of over 5,800 units per annum. The private sector land requirement (76,670) exceeds the original Housing Estimates (52,540) by 46%, whilst the all tenure requirement exceeds the Housing Estimates by 17%. The private sector land requirements should be met at housing sub-market area to provide for local and mobile housing demand and Schedules 9 and 10 set out the land requirement compared with the land supply at both Housing Sub-Market Area and Local Authority geography. There is sufficient existing private land supply with generosity overall, albeit with a potential local shortfall in the Airdrie and Coatbridge~~

~~housing sub-market area. This shortfall will be a matter for North Lanarkshire Council to consider in the context of its Local Development Plan. The effectiveness of the housing land supply will be tested prior to preparation of each Local Development Plan Proposed Plan to identify the scale of further housing allocations to be made.~~

~~6.71 This under recording of the social sector in the programmed medium to longer term supply, when compared with the housing land requirement, leads to a theoretical shortfall of 13,420 units i.e. Schedule 6, 2012–29 Housing Land Supply minus Housing Land Requirement (17,870–31,290). However, there is a surplus in the private sector of 23,060 units (99,730–76,670) and in the overall land supply of 9,640 (117,600–107,960). When considered alongside the contribution of windfall sites that come forward, particularly to meet social housing need, it is concluded that no strategic scale additions to the supply are required.~~

- ~~• **Delete** Schedule 9 Private Housing Land Requirement by Housing Sub-Market Area.~~
- ~~• **Delete** Schedule 10 Private Housing Land Requirement by Local Authority.~~

Stewart Milne Homes (PP49_01) (PP49_02) (PP49_03)

As they consider that the Strategic Development Plan should confine itself to setting out the housing land requirements which should be delivered by the subsequent Local Development Plans, Schedules 9 and 10 should be deleted and all related references should be removed from the text where they occur.

Mr W Hill & Mr R Hill (PP53_01) (PP53_03)

They consider that if estimates of housing supply are to be included in Clydeplan, they should be scaled down to reflect the fact that there is much uncertainty regarding delivery. Also, it should be made very clear that the housing numbers identified are just estimates, which will be reassessed through the Local Development Plan process to establish the need or otherwise for new housing land to be allocated.

British Land Company plc (PP55_02)

No specific modification is sought.

Summary of responses (including reasons) by Planning Authority:

Overview

Clydeplan has undertaken significant analysis of land supply, delivery and related trends over the long term within the Glasgow and the Clyde Valley city region. In the circumstances in which there is a substantial supply of land for housing, almost twice as much as in 1997, with delivery at half of long term average rates, this calls into question the strength of the correlation between increasing supply and improvements in delivery. Many other wider economic, societal and demographic trends influence delivery, with the land availability being only one consideration.

Throughout its approach Clydeplan has sought to reflect these realities including that in the circumstances described in the Clydeplan area, the relationship between land supply and delivery can be weak (Monitoring Statement January 2015, pages 43-51 **(ASD07)**, Background Report 7 Land Supply for Housing Monitoring Report 2013 **(ASD08)**, and Land Supply for Housing Monitoring Report 2014 **(ASD09)**).

Given these considerations, combined with the evidence on the scale and quality of the land supply and a Spatial Development Strategy which focuses on urban regeneration, Clydeplan has sought to focus the policy agenda primarily but not exclusively, on delivering the existing land supply, hence the policy focus on Leadership and Delivery (Section 4 of the Plan), and Policy 7 Joint Action Towards the Delivery of New Homes.

Stewart Milne Homes (PP49_01) (PP49_02) (PP49_03) and Messrs Hill (PP53_01) (PP53_03) have queried the amount of detail provided on land supply in the Plan, however for the reasons detailed in the foregoing, it was considered important to describe fully, the land supply context on which this Proposed Plan is predicated.

Clydeplan's detailed responses to the issues raised relevant to Housing Land Supply are provided in the following.

Selection of Scenario

Homes for Scotland (PP35_02, PP35_03)

CALA Homes (West) (PP43_02)

Wallace Land Investments (PP45_02)

Hallam Land Management (PP46_02)

Stewart Milne Homes (PP49_01) (PP49_02) (PP49_03)

Mr W Hill & Mr R Hill (PP53_01) (PP53_03)

Clydeplan does not accept the modifications to the section of the Plan on Housing Land Supply and other sections of the Plan; re-running of the Housing Need and Demand Assessment; and amending Proposed Plan Policy 8 and the associated text, schedules and Background Reports. As documented in the Proposed Plan at Paragraphs 6.47-6.51 and within its response to Issue 10, Selection of Growth Scenario and Issue 11, Housing Land Requirement, Clydeplan fully supports and has justified its adoption of the Sustained Growth Scenario and does not accept that a higher migration scenario should have been adopted.

Compliance with Scottish Government Planning Policy

CALA Homes (West) (PP43_02)

Wallace Land Investments (PP45_02)

Hallam Land Management (PP46_02)

Clydeplan does not accept the modification as it considers that the Plan complies with paragraphs 117-119 of Scottish Planning Policy **(ASD01)** for the reasons set out in the following.

The representees assert that the Plan is contrary to paragraphs 117-119 of Scottish

Planning Policy but are not explicit in what regard this assertion is made. However, specific modifications have been proposed by the representees as detailed under the headings in the following sections of this response where those matters are responded to in detail.

Clydeplan would assert that both the Main Issues Report and Proposed Plan closely reflect the policy principles, detail, and style of, Scottish Planning Policy and National Planning Framework 3. Clydeplan has received detailed written feedback from the Scottish Government on the Main Issues Report and the Draft and Final Proposed Plans. Given the lack of comment from the Scottish Government on this matter in its response to the Proposed Plan (**ASD27**), Clydeplan considers that the Proposed Plan is compliant with Scottish Planning Policy and National Planning Framework 3. Additionally, in relation to the Housing Need and Demand Assessment, the Scottish Government CHMA conferred “robust and credible” status on 21st May 2015 (**ASD22**). Clydeplan does not therefore accept that the Proposed Plan is contrary to Scottish Planning Policy.

Paragraphs 6.66-6.71 General -

Quality of the Land Supply, Rigour of the Audit Process and Point in Time

Homes for Scotland (PP35 02) (PP35 03)

CALA Homes (West) (PP43 02)

Wallace Land Investments (PP45 02)

Hallam Land Management (PP46 02)

Stewart Milne Homes (PP49 02) (PP49 03)

Mr W Hill & Mr R Hill (PP53 01) (PP53 03)

British Land Company plc (PP55 02)

Clydeplan does not accept the modifications relating to the assessment and quality of the land supply and the view that the land supply should be described as a point in time without prejudicing the future role of Local Development Plans, for a number of reasons set out and expanded on, in the following. In summary, Clydeplan considers that:

- The audit process is undertaken annually to agreed and rigorous standards;
- The audit produces a rationale and consistent view of land available for housing the majority of which is agreed with Homes for Scotland;
- Through annual monitoring, Clydeplan has developed a detailed understanding of the quality and scale of the land supply, and this information has been utilised appropriately to inform the plan;
- Policy 8, Housing Land Requirement is an appropriate policy response and will ensure that Local Authorities respond to address any land supply shortfalls that may emerge in future.

As detailed in Scottish Planning Policy and Planning Advice Note 2/2010 an annual housing land audit is recommended as a tool to critically review and monitor the availability of effective housing land and progress of sites and this is reflected in bullet point 4 of Policy 8, Housing Land Requirement.

Clydeplan is satisfied with the accuracy of the assessment of the effectiveness of the housing land supply undertaken annually by the Local Authorities which is agreed (or disputed) with Homes for Scotland. The process is undertaken under consistent Clydeplan guidance (**ASD28**) which has been shared with Homes for Scotland. Every year sites are added, completed, de-allocated/removed from the audit, split to reflect phasing and programming, capacities amended, and other similar updates to reflect planning applications, Local Development Plans and the views of Homes for Scotland. Effectiveness of the supply is considered and agreed, or not, between the Local Authorities and Homes for Scotland. The dispute rate in the Clydeplan area averages 2.6% of the effective supply and the vast majority of the land supply is agreed as undisputed (Background Report 7, Land Supply for Housing Monitoring Report 2013, pages 13-14 (**ASD08**) and Land Supply for Housing Monitoring Report 2014, pages 19-20 (**ASD09**)).

Clydeplan has undertaken detailed analysis of the land supply documented in its annual housing land monitoring reports, and the Local Authorities and Clydeplan, working with Homes for Scotland, have scrutinised and challenged the quality of the supply. The land supply contains a range and choice of sites, locations and opportunities for different house types. Analysis in the 2013 Monitoring Report indicates that the projects within the Spatial Development Corridor (pages 26-28 of the Proposed Plan) are delivering development. Detailed analysis has been undertaken of the Community Growth Areas within the Annex to the Monitoring Statement (**ASD07**), which reveals that, whilst levels of delivery are currently low, that in the majority of cases the expectation from planning authorities and the industry, is that development will improve through time. Those Community Growth Areas that are not expected to deliver housing either in the short term or at all, are either not included in the audit as in the case of Easterhouse; are programmed in the longer term post seven year period; or are subject to review by the local authority as in the case of Wishaw. The seven year programming of all of these locations is agreed with Homes for Scotland annually.

Clydeplan does not accept the modification to paragraphs 6.66-6.71 as it considers that it is important that the Plan has a base date to determine both demand and supply. Clydeplan considers that the Plan requires to be predicated upon a position at a base year. For this Plan the projections are from base year 2012, (based on the 2012 based National Records of Scotland Projections) updated to reflect the most up to date land supply position at 2013. Policy 8, Housing Land Requirement is the policy response that is to ensure that Local Authorities, through Local Development Plans and Development Management, meet the Housing Land Requirement through Local Development Plans, monitor the land supply position and respond to address any shortfalls that may emerge in future.

Paragraphs 6.66 to 6.71 - Other

Paragraph 6.66

CALA Homes (West) (PP43 02)

Wallace Land Investments (PP45 02)

Hallam Land Management (PP46 02)

Clydeplan does not accept the modification to paragraph 6.66 as it considers that this is appropriately reflected in the Plan and therefore not necessary. Clydeplan considers that given the assessment of the land supply through the annual audit process which is agreed with Homes for Scotland, combined with the Policy requirement of Policy 8 of the Proposed Plan which requires that Local Development Plans allocate sites to meet the Housing Land Requirement; provide a minimum 5 year land supply; monitor the land supply through the annual audit; and take steps to remedy any shortfalls; that the suggested addition of text to paragraph 6.66 is not necessary.

Paragraphs 6.67

CALA Homes (West) (PP43 02)

Wallace Land Investments (PP45 02)

Hallam Land Management (PP46 02)

Clydeplan does not accept the modification to delete the word “substantial” in relation to the established supply as Clydeplan considers that it is highly relevant to emphasise the current scale of the land supply and therefore to derive the appropriate policy responses.

The diagram on Page 17 of the Land Supply for Housing Monitoring Report 2014, “Established and Effective Private Sector Land Supply 1996-2014 (**ASD09**), reveals that the housing land supply is currently almost double what it was in 1996, whilst currently delivering only half the amount of completions. Understanding these trends will lead to the appropriate policy responses which will not always be about supplementing the housing land supply. Hence the need to emphasise the scale of the land supply and the policy focus on leadership, delivery and regeneration.

Paragraphs 6.69

CALA Homes (West) (PP43 02)

Wallace Land Investments (PP45 02)

Hallam Land Management (PP46 02)

Clydeplan does not accept the modification to delete and amend the text of paragraph 6.69 as Clydeplan considers that:

- it is highly relevant to emphasise the current scale of the land supply and therefore to derive the appropriate policy responses; and
- the additional text proposed relating to the land supply and its testing at Local Development Plans adds no value to the requirements of Policy 8 and

is unnecessary.

The introductory text at this paragraph describing the scale of the private sector land supply, is considered highly relevant in communicating the issues to a range of the Plan's readers. The points are made here to emphasise conclusions in the Proposed Plan and elsewhere, that land is not always a major impediment to delivery within the city region and that wider economic and fiscal conditions are having significant impacts, a consequence of which is the policy focus of the Plan on leadership and delivery.

See also topic 'Schedules 9 and 10' below.

Schedules 9 and 10

Homes for Scotland (PP35_03)

CALA Homes (West) (PP43_02)

Wallace Land Investments (PP45_02)

Hallam Land Management (PP46_02)

Stewart Milne Homes (PP49_03)

Clydeplan does not accept the modification that Schedules 9 and 10 should be deleted or amended (including reference to them at paragraph 6.69), or that the columns relating to the land supply and surplus/shortfalls should be removed, for a number of reasons. Clydeplan considers that inclusion of Schedules 9 and 10 are required by Scottish Planning Policy, that the columns on the "housing land supply" and "surplus/shortfall" add transparency and clarity, and that Policy 8 allows for the future responses of Local Authorities.

By way of further explanation, the inclusion of the columns relating to the housing land supply at 2013 and the surplus/shortfall are intended to provide clarity and transparency on the land supply position by housing market area and local authority, at the point in time when the Strategic Development Plan is prepared. This reveals for example, that there is a shortfall within the Airdrie and Coatbridge Housing Market Sub-area in both periods of the projection which seems important for the Strategic Development Plan to highlight.

Beyond this point in time, Policy 8 is to ensure that the Local Authorities continue to monitor the land supply, maintain a five year effective supply and take appropriate action through Local Development Plan and Development Management, to remedy any shortfalls. This Policy therefore enables Local Authorities to respond and take action in the future at any time, to remedy any shortfalls in the land supply.

Paragraphs 6.71

Homes for Scotland (PP35_02) (PP35_03)

CALA Homes (West) (PP43_02)

Wallace Land Investments (PP45_02)

Hallam Land Management (PP46_02)

Clydeplan does not accept the modification that this paragraph is deleted and/or that the final conclusion of the paragraph is deleted for a number of reasons set out

and expanded on, in the following. In summary, Clydeplan considers that:

- The paragraph adds clarity, reality and describes the complex and differing ways in which delivery responds between the tenures and relative to land supply;
- The conclusion that there is a sufficiency in the all-tenure supply overall and is considered important in relation to Clydeplan's response and the response of the Local Development Plans; and
- it is considered appropriate for the Plan to clearly state that at this time no strategic scale additions to the supply are required.

Further explanation is provided in the following.

The introductory text combined with paragraph 6.70 and the section on Tenure at paragraphs 6.43-6.45, is intended to describe Clydeplan's understanding of how the social sector housing need, land supply and delivery operate, which are all influenced in a manner that is different to the private sector. This understanding is supported through preparation of the Housing Need and Demand Assessment combined with analysis of the social sector land supply, funding and delivery.

To discuss land supply issues without describing these differences, would fail to acknowledge these realities and the complex and differing ways in which delivery responds between the tenures and relative to land supply. Clydeplan has sought to describe these differences realistically and coherently, and therefore does not accept the proposed modification that this text should be deleted.

Paragraph 6.71 however concludes that despite these differences in the responsiveness of the social sector land supply, that there is a sufficiency in the all-tenure supply overall and this conclusion is considered important to state in relation to Clydeplan's response in the Proposed Plan and the response of the Local Development Plans that will follow.

It has specifically been suggested that the final conclusion of paragraph 6.71 "that no strategic scale additions to the supply are required" be deleted. Bullet point 5 of Policy 8 combined with the other references within the Plan to the presumption in favour of proposals that contribute to sustainable development at paragraphs 1.8 and 5.5, enable development proposals to be assessed positively, and the land supply will be supplemented in this manner. Given this, combined with Clydeplan's position with regard to Issue 10, Selection of the Growth Scenario, it is considered appropriate for the Plan, to clearly state that at this time no strategic scale additions to the supply are required.

Urban Capacity Study

Stewart Milne Homes (PP49_03)

Clydeplan does not accept the comments around the Urban Capacity Study including that most of the established housing land supply has never been tested for effectiveness or deliverability with the housing industry. Clydeplan considers that there is substantial rigour already built in to the annual housing audit process,

including consideration of the established land supply, which makes up the largest element of the Urban Capacity Study.

They also states that 32% of the established housing land supply is not included in any housing land audit and that 64,000 units of supply programmed between 2020 and 2029, have not been subject to detailed testing or assessment.

By way of clarification, the Urban Capacity Study is used to consider potential additional contributions to the housing land supply from sites not already programmed in the housing land audit which programmes sites over a seven year period. A large element of the Urban Capacity Study is simply the sites already in the Housing Land Audit programmed in the post seven year period for longer term strategic planning purposes. Those sites are considered by Homes for Scotland as part of the annual review of the land audit and as part of that review process, Homes for Scotland may and do, ask for sites that they consider to have no prospect of delivery to be removed from the audit.

101,611 units were identified through the Urban Capacity Study with the vast majority of those sites coming from the Housing Land Audit and programmed in the post 2020 effective period **(ASD29)**.

New sites arising from the Urban Capacity Study, and not already in the Housing Land Audit, typically come from the following sources: sites currently in other land uses; pending planning applications; sites in emerging Local Development Plans; and public sector assets including for example schools and hospitals. Some of these require to be regarded as Confidential.

Of the 101,611 units, 11,929 required to be treated as confidential with the majority of the remaining 89,682 already included in the Housing Land Audit and already therefore shared with the industry through the annual consultation with Homes for Scotland. From the table "Capacity Source" (Section 8, Background Report 9, Urban Capacity Study **(ASD29)**), 66% of sites programmed in the Urban Capacity Study come from existing housing land audit sites which have already been considered by Homes for Scotland but not programmed in the longer term.

In conclusion, the vast majority (66%) of the land supply programmed in the Urban Capacity Study is simply those sites already in the established part of the housing land audit considered by Homes for Scotland every year. Analysis of the likelihood of sites in the Urban Capacity Study entering the Housing Land Audit and being delivered, documented in paragraphs 6 and 7 of the appendix of the Guidance Note for the Study, gives greater confidence on the validity of the use of an Urban Capacity Study **(ASD29)**.

Given the foregoing, Clydeplan therefore considers that the Urban Capacity Study is a reasonable basis on which to consider the contributions to the longer term land supply, the majority of which has already been considered by the industry through the Housing Land Audit process.

Suggested New Policy - Housing Land Supply

Homes for Scotland (PP35_03)

Clydeplan does not accept the modification to introduce a new policy on Housing Land Supply as Clydeplan for a number of reasons set out and expanded on, in the following. In summary, Clydeplan considers that:

- Clydeplan's approach to 10% generosity to be applied only to the private sector has been justified in the Plan and in response to Issue 11, Housing Land Requirement;
- It is clearly intended in the Scottish Government Draft Planning Delivery Advice that once generosity is applied at the level of the Strategic Development Plan it is not to be revisited at the Local Development Plan stage and the proposed modification would run counter to this; and
- The other matters covered in point 2 and 3 in relation to land audits and the presumption in favour of sustainable development are already addressed within the Plan and therefore the modification is considered unnecessary.

The suggested text for a new policy on Housing Land Supply is predicated on an implied assumption that the quality of the land supply is not rigorously tested, a view which is not accepted by Clydeplan as described earlier in this response under the section, "Paragraphs 6.66-6.71 – Quality of the Land Supply, Rigour of the Audit process and Point in Time".

Point 1 of the new policy as proposed by Homes for Scotland (PP35_02) (PP35_03) relates to the maintenance of a generous supply of housing land and the application of generosity at 20%. The justification for a 10% generosity level to the private sector, has been provided under Issue 11, Housing Land Requirement and Clydeplan does not therefore accept this suggestion.

Additionally, the Draft Planning Delivery Advice: Housing and Infrastructure (**ASD30**) includes the following paragraphs:

- *'33. Within strategic development plan areas, consistency and agreement on the distribution of the target among the constituent local authorities is essential, as once the HST has been set by the strategic development plan, there should be no further debate within the local development plan. Effective Implementation by local development plans, depends on achieving clarity, rather than flexibility, at the strategic level.'*
- *36. Generosity is applied at the strategic development plan level, and not revisited at the local level.'*

It is clearly intended that once generosity is applied at the level of the Strategic Development Plan it is not to be revisited at the Local Development Plan stage. Clydeplan therefore does not accept the proposed wording at Point 1 of the proposed new policy.

Point 2 of the proposed new policy covers those matter that are routinely covered

as part of the annual housing land audit process required under Policy 8 of the Proposed Plan and covered by Scottish Government advice included in Section 2 of Planning Advice Note 2/2010 (**ASD26**) and the emerging Draft Planning Delivery Advice: Housing and Infrastructure pages 12-18 (**ASD30**). Given that there is rigour built into the annual audit process as described in the foregoing, the suggested wording is considered unnecessary and therefore Clydeplan does not accept the proposed new policy wording.

In relation to Point 3 of the proposed policy wording, bullet point 3 of Policy 8 covers the maintenance of a five year effective land supply. Also, the Proposed Plan already supports the presumption in favour of sustainable development referenced at paragraphs 1.8, 5.5, bullet point 5 of Policy 8, and Diagram 11, Box 2. Clydeplan does not therefore accept these modifications as they are considered unnecessary.

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]