

Issue 13	Joint Action Towards the Delivery of New Homes	
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>Police Scotland (PP16) Homes for Scotland (PP35_03) Gladman Scotland (PP40) CALA Homes (West) (PP43_01) Wallace Land Investments (PP45_01) Hallam Land Management (PP46_01) British Land Company plc (PP55_02)</p>		
Provision of the development plan to which the issue relates:		
<p>Enabling Delivery of New Homes (pages 48-49) Delivering New Homes and Joint Action (pages 49-51) Policy 7 Joint Action Towards the Delivery of New Homes (page 50)</p>		
Planning Authority's summary of the representation(s):		
<p><u>Police Scotland (PP16)</u></p> <p>Police Scotland have commented that no reference is made to the Community Empowerment Act 2015 in paragraph 6.33, page 50.</p> <p><u>Homes for Scotland (PP35_03)</u></p> <p>Within the representation form they refer to their Composite Representation Report (RSD11) and the Turley's Report on Developing an Effective Deliverable Housing Strategy, Homes for Scotland – Clydeplan (RSD10), as additional supporting evidence.</p> <p>They consider paragraph 6.28 to be unduly negative and have suggested changes to this paragraph and paragraph 6.29 to articulate the role of Local Development Plans and Housing Land Audits.</p> <p>They consider Policy 7 to be unclear in its intention and consider that it should provide a mechanism for new sites to be approved. If there is under delivery as per Scottish Planning Policy (paragraph 33) (RSD01) (They suggest that paragraphs 6.33 and 6.34 of the Proposed Plan could be included in this policy and provide alternative wording).</p> <p><u>Gladman Scotland (PP40)</u></p> <p>The Proposed Strategic Development Plan should provide further evidence for the</p>		

statement in paragraph 6.29 that “analysis indicates that delivery can be relatively unresponsive to land supply”.

CALA Homes (West) (PP43 01), Wallace Land Investments (PP45 01), Hallam Land Management (PP46 01)

The Proposed Plan does not comply with Scottish Planning Policy as it does not fully reflect the requirements of paragraph 118 and 119 (**RSD01**) that Local Development Plans must address. The economic context set out in paragraph 6.28 does not override the planning requirements of Scottish Planning Policy and should not be included in this section of the Strategic Development Plan.

Scottish Planning Policy requires a Strategic Development Plan to “*state the amount and broad locations of land which should be allocated in local development plans to meet the housing land requirement up to year 12 from the expected year of plan approval, making sure that the requirement for each housing market area is met in full*” (paragraph 118) (**RSD01**).

This is required in order to enable Local Development Plans to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption (paragraph 119) (**RSD01**).

Accordingly replacement text is required in the *Delivering New Homes and Joint Action* section to guide emerging Local Development Plans to fully reflect the policy requirements set out in paragraph 118 and 119 of Scottish Planning Policy.

Modification of this section will align the Strategic Development Plan with Scottish Planning Policy.

British Land Company plc (PP55 02)

British Land Company plc does not object to this policy to promote joint action towards the delivery of new homes. However it offers a guarded response in terms of the effectiveness of the policy itself in securing the delivery of new homes when it will rely on the concerted efforts of a wide range of stakeholders in the public, private and housebuilding sector.

British Land likes the sentiment of the Policy referring to “*development of innovative mechanisms, which improve housing delivery across all sectors. This should focus on the existing housing land supply and public sector estate whilst bringing forward new opportunities through the granting of planning permissions that contribute to sustainable development*”. Generous land supply alone will not deliver the homes, and the reference to innovative solutions in para 6.31 is encouraging, however there is no detail or guidance as to what it envisaged or intended here, although para 6.33 makes an attempt.

British Land provide some helpful comment on their view of the provisions detailed in paragraph 6.33. Although no specific changes are sought, British Land would like to see more explanation or detail about the proposed solutions to delivery as per

paragraph 6.33.

Modifications sought by those submitting representations:

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

Police Scotland (PP16)

Police Scotland have commented that reference should be made to the Community Empowerment Act 2015 in paragraph 6.33, page 50.

Homes for Scotland (PP35 03)

Homes for Scotland have suggested a number of specific changes to paragraphs and policy wording as detailed in the following:

Page 49, Paragraph 6.28

The following text (~~strikethrough~~) should be deleted:

~~6.28 Clydeplan seeks to fully support the housing and development industry to provide homes of the right tenure, quality and in locations which accord with its Vision and Spatial Development Strategy.~~

~~A key element of the Clydeplan response is to ensure the provision of a generous and effective supply of land for housing. However, achieving delivery of housing on the scale that is planned has its challenges given the demographic, economic and fiscal context:~~

~~1) total employment within the city region has dropped by 9% (86,000 jobs) since 2008;~~

~~2) mortgage lending and development finance has significantly reduced;~~

~~3) there has been a slowing in the rates of household formation, particularly amongst young adults;~~

~~4) there are continuing high levels of need for social and affordable housing and shifts to private renting;~~

~~5) house sales and transactions are currently at half pre-recessionary levels;~~

~~6) private sector completions have decreased by 60% since 2007/08 with delivery of higher density flatted developments in urban locations particularly depleted.~~

Page 49, Paragraph 6.29

The following text underlined should be added.

6.29 Part of Clydeplan's response is to ensure that a generous supply of land is available for development. However, analysis indicates that delivery can be relatively unresponsive to the land supply, with private sector completions remaining low despite a generous land supply (Background Report 7). This is clearly an issue that needs to be resolved by the Local Development Plans. A thorough review of existing housing land allocations must be undertaken to better understand the constraints to delivery that might exist. If allocations have no obvious prospect of delivery they should be discounted from the established supply. This would not preclude them from coming forward as windfall developments but

would allow a realistic housing land supply to be established.

Page 50, Policy 7:

Policy 7 - Joint Action Towards the Delivery of New Homes

1) In order to enhance housing delivery and contribute to the creation of high quality places ~~in support of the Vision and Spatial Development Strategy~~, Local Authorities, Community Planning Partners and the Housebuilding and Development industry, ~~require to take concerted strategic long term actions at the highest levels in those organisations~~ will work to ensure the identification and delivery of the homes needed to support the Vision and Spatial Development Strategy of this Plan.

Specifically:

- a) Local Authorities, at all levels and using a range of measures, ~~should~~ will continue to work proactively and collaboratively with housing delivery stakeholders.
- b) Joint action ~~should~~ will seek to prioritise activities, including the allocation of resources and development of innovative mechanisms, which improve housing delivery across all sectors.
- c) ~~6.34~~ The Housebuilding and Development industry private sector ~~also requires to respond with~~ will be supported ~~innovation and flexibility~~ to develop affordable solutions and delivery models that can be made to work in current economic and market conditions and which meet housing need including the housing need of younger people, private renters and the ageing population.

2) In order to maintain housing delivery throughout the plan period Local Authorities will:

- a) ~~6.33~~ ~~In addition to the identification of~~ identify and maintain a generous land supply in the Local Development Plan and implementation of the City Deal projects, ~~other public sector activities will include:~~
- b) fostering a positive corporate culture supportive of development delivery;
- c) ~~the provision of~~ provide certainty through up to date development plans;
- d) prepare as appropriate Supplementary Guidance, master plans ~~and~~, development briefs and planning permissions to speed up the delivery process;
- e) apply ~~the application of~~ proportionate and flexible arrangements for Planning Obligations seeking affordable developers contributions towards infrastructure needed to support new developments;
- f) effective ~~effectively~~ use of the public sector estate and land assembly including through the use of Compulsory Purchase Orders where required;
- g) support ~~for~~ registered social landlords to up-scale delivery with a range of innovative products;
- h) apply innovative approaches to the funding of infrastructure and arrangements for sharing the risk and rewards from development between the private and public sector; ~~and~~

- i) engagement with wider community planning partners and communities;
- j) test housing land for deliverability and viability annually and discount sites that continually fail to come forward for development;
- k) increase housing delivery rates through the application of the presumption in favour of development that contributes to sustainable development. This should focus on the existing housing land supply and public sector estate whilst bringing forward new opportunities through the granting of planning permissions. ~~that contribute to sustainable development and accord with the Vision and Spatial Development Strategy, Local Development Plans and other local strategies.~~

Gladman Scotland (PP40)

The Proposed Strategic Development Plan should provide further evidence for the statement in paragraph 6.29 that “*analysis indicates that delivery can be relatively unresponsive to land supply*”.

CALA Homes (West) (PP43 01), Wallace Land Investments (PP45 01), Hallam Land Management (PP46 01)

Modify the following text in the Proposed Plan as shown below.

6.28 Clydeplan seeks to fully support the housing and development industry to provide homes of the right tenure, quality and in locations which accord with its Vision and Spatial Development Strategy. A key element of the Clydeplan response is to ensure the provision of a generous and effective supply of land for housing. ~~However, achieving delivery of housing on the scale that is planned has its challenges given the demographic, economic and fiscal context:~~

- ~~1) total employment within the city region has dropped by 9% (86,000 jobs) since 2008;~~
- ~~2) mortgage lending and development finance has significantly reduced;~~
- ~~3) there has been a slowing in the rates of household formation, particularly amongst young adults;~~
- ~~4) there are continuing high levels of need for social and affordable housing and shifts to private renting;~~
- ~~5) house sales and transactions are currently at half pre recessionary levels;~~
- ~~6) private sector completions have decreased by 60% since 2007/08 with delivery of higher density flatted developments in urban locations particularly depleted.~~

6.29 Part of Clydeplan’s response is to ensure that a generous supply of land is available for development. However, analysis indicates that delivery can be relatively unresponsive to the land supply, with private sector completions remaining low despite a generous land supply (Background Report 7). 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. A review of the established land supply must be undertaken by each Local Authority prior to the preparation of the Local Development Plan. If allocations have no realistic prospect of delivery, these sites should be removed from the established supply. This would not preclude these sites from contributing as windfall development in the future.

British Land Company plc (PP55_02)

No specific changes are sought, however British Land would like to see more explanation or detail about the proposed solutions to delivery as per Para 6.33.

Summary of responses (including reasons) by Planning Authority:

Compliance with Scottish Government Planning Policy

CALA Homes (West) (PP43_01)

Wallace Land Investments (PP45_01)

Hallam Land Management (PP46_01)

Clydeplan does not accept the modification that the Proposed Plan is contrary to paragraphs 118-119 of Scottish Planning Policy (**ASD01**), for the reasons set out in the following.

It is not explicit in what regard this assertion is made however specific modifications are proposed, in the form of additional text at paragraph 6.29 addressed under that topic heading below.

As a general principle Clydeplan would assert that both the Main Issues Report and Proposed Plan closely reflect the policy principles, details and style of, Scottish Planning Policy and National Planning Framework 3. Clydeplan has received 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 (**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 Centre for Housing Market Analysis conferred “robust and credible” status on 21st May 2015 (**ASD22**).

Paragraph 6.28

Homes for Scotland (PP35_03)

CALA Homes (West) (PP43_01)

Wallace Land Investments (PP45_01)

Hallam Land Management (PP46_01)

Clydeplan does not accept the modification to delete the text relating to the demographic, economic and fiscal context in paragraph 6.28 as Clydeplan considers that it is important to describe those factors influencing development delivery with reality. In its approach to the development of the housing policy response in the Proposed Plan, Clydeplan has attempted to present a realistic view

of the impacts of the recession and wider economic and other influences that have impacted on the delivery of housing. It is therefore regarded as important to describe some of the demographic, economic and fiscal factors, currently having a significant influence on the delivery of housing on the ground.

Whilst no specific modification is sought, Clydeplan considers the comment made by Homes for Scotland (PP35_03) in relation to paragraphs 6.66-6.71 that some sites may require some form of subsidy to realise their development is helpful in the context of the delivery of housing across the city region. If the Reporter is so minded, Clydeplan would suggest that an additional bullet point be added to paragraph 6.33 before the final bullet point resulting in the following additions (underlined) and deletions (strikethrough):

- 'innovative approaches to the funding of infrastructure and arrangements for sharing the risk and rewards from development between the private and public sector; ~~and~~
- direct subsidy; and,
- engagement with wider community planning partners and communities.'

Paragraph 6.29

Homes for Scotland (PP35_03)

CALA Homes (West) (PP43_01)

Wallace Land Investments (PP45_01)

Hallam Land Management (PP46_01)

Clydeplan does not accept the modification which would introduce additional text describing the role of Local Development Plans and the role of Housing Land Audits as Clydeplan considers that Policy 8, Housing Land Requirement covers these matters adequately.

Policy 8 is very specific and clear on the role of Local Development Plans in making provisions for the all tenure housing land requirement and maintaining a five year effective land supply; the role of annual housing land audits; and the role of Development Management in addressing any potential shortfalls. An implicit role of the annual land audit, as detailed in the current and emerging advice (PAN 2/2010 at Section 2 (**ASD26**) and the Draft Planning Delivery Advice: Housing and Infrastructure at pages 12-18 (**ASD30**) is to review land allocations, identify constraints and assess their prospect of delivery. These matters are agreed annually with Homes for Scotland on behalf of the industry and therefore for these reasons, Clydeplan does not therefore accept that the points suggested as additions to paragraph 6.29 are necessary as they are fully covered in Policy 8, Housing Land Requirement.

Gladman Scotland (PP40) have asked for further evidence for the statement in this paragraph that "*analysis indicates that delivery can be relatively responsive to the supply*". The source of this conclusion is from ongoing analysis of the annual land audits and Background Report 7 is referenced in this regard (**ASD08**). Since finalising the Proposed Plan, analysis of the 2014 Audit has been published which further supports this statement (**ASD09**). The specific sections are Section 4 of

Background Report 7 on “Long Term Trends” and the same numbered section of the Land Supply for Housing Monitoring Report 2014 and in particular the graphs at paragraphs 4.22 and 4.28. Clydeplan therefore considers that the evidence is available to justify its conclusion regarding the responsiveness of delivery to supply in the Clydeplan area and does not accept that further evidence is required.

Paragraph 6.33

Police Scotland (PP16)

Clydeplan does not accept the modification that there is a need to refer to the Community Empowerment (Scotland) Act 2015 at paragraph 6.33 as suggested by Police Scotland (PP16) as it is considered that not every relevant piece of legislation requires to be referenced within the Plan.

The text at paragraph 6.33 on Page 50 provides a list, which is not exhaustive, of other public sector activities that will be required to contribute towards delivery, in addition to City Deal and providing a generous land supply through Local Development Plans. Additionally, included at the final bullet point is “engagement with wider community planning partners and communities” and this reference to community engagement is considered to adequately cover this issue.

Policy 7 and Paragraphs 6.33 and 6.34

Homes for Scotland (PP35 03)

Clydeplan does not accept the modification to introduce alternative wording for Policy 7 with alterations combining text from paragraphs 6.33 and 6.34, for a number of reasons set out and expanded on, in the following. In summary, Clydeplan considers that:

- retaining comments within paragraphs 6.33 and 6.34 around the role of the private sector and public sector within the narrative rather than the Policy is generally preferred;
- and the proposed references to the role of land audits and housing delivery are already covered adequately under Policy 8, Housing Land Requirement.

The Policy refers to the role of the private sector which is crucial; however the main focus of the Policy is aimed at activities within the local authorities over which Clydeplan has more direct involvement. Further text on the role of the private sector is provided in the narrative at paragraph 6.34 and retaining those comments within the narrative rather than the Policy is considered appropriate. The suggested inclusion of the words that the housebuilding and development industry “will be supported”, is adequately covered within the second paragraph of the Policy 7, and is therefore considered unnecessary. For these reasons, Clydeplan does not therefore accept the proposed conjoining and alterations of Policy 7 and Paragraph 6.34.

The representee also suggests the incorporation of Paragraph 6.33, along with amendments, into a new second part of Policy 7. Policy 7 is overarching about the

role and emphasis of activities that all stakeholders will require to adopt to facilitate delivery, albeit with the focus on the public sector. Paragraph 6.33 provides a long, but not exhaustive list, of examples of the types of actions that the public sector can take to assist in supporting development delivery. As such the list is not definitive but is appropriately placed within the narrative of the Plan rather than within Policy 7. For these reasons Clydeplan does not accept the suggested incorporation of paragraph 6.33 within the policy wording.

Specific wording changes are suggested to Policy 7 at Point 2 (a) referring to the role of Local Authorities in maintaining a generous land supply; at Point 2 (j) referring to the role of land audits; and at Point 2 (k) on increasing delivery rates through the presumption in favour of development. Policy 8 is very specific and clear on the role of Local Development Plans in making provisions for the all tenure housing land requirement, the role of housing land audits in testing and reviewing allocations annually, and the role of Development Management in addressing any potential shortfalls. The Plan refers to the presumption in favour of sustainable development at paragraphs 1.8, 5.5 and also recognising the contribution to sustainable development within Policy 8, bullet point 5 on the Development Management context and for these reasons Clydeplan does not therefore accept that Policy 7 requires modification in these regards.

Other

British Land Company plc (PP55_02)

The comments of British Land PLC are noted and welcomed and Clydeplan will seek to engage directly with key stakeholders, through joint working around the Action Programme, to develop mechanisms to support development delivery.

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]