

Issue No: 17

Issue: Effectiveness and Additional Housing Land

Contents Page

1. Schedule 4

Representations

2. Quarriers (E6)
3. Taylor Wimpey UK Ltd (E8)
4. Wallace Land (E9)
5. CALA Homes/ Taylor Wimpey UK Ltd (E10)
6. Cemex UK Ltd. (E12)
7. Land Synergy (E14/1)
8. Bellisle Developments Ltd (E15/1)
9. Wm. Short esq (E18)
10. Duchal Estate (E19)
11. H. J. Paterson (E20)
12. Scottish Property Federation (E23)
13. Banks Group (E24)
14. Ogilvie Homes Ltd (E29/2)
15. NHS Greater Glasgow and Clyde (E30)
16. Caledonian Properties (E31)
17. James Barr Ltd (E34)
18. Messrs Keith & John Lawrence (E35)
19. Lynch Homes (E42/2)
20. Lynch Homes (E42/4)
21. CALA Homes (West) (E45/2)
22. CALA Homes (West) (E45/4)
23. Susan Barnes (Landowner) (E46/1)
24. Susan Barnes (Landowner) (E46/2)

25. Susan Barnes (Landowner) (E46/4)
26. Jackton & Thorntonhall Community Council (E49/5)
27. Hometown Foundation (E50)
28. Scottish Government (Directorate for the Built Environment) (E51/1)
29. Mactaggart and Mickel (Homes) Ltd. (E52/13)
30. SRG Estates (E53/1)
31. Homes for Scotland (E55/4)

Supporting Documents

1. Letter from the Scottish Government's Centre for Housing Market Area Analysis 'Glasgow and the Clyde Valley's Housing Need & Demand Assessment (HNDA): Final Appraisal by the Centre for Housing Market Analysis (CHMA) (21 June 2011)
2. Housing Need and Demand Assessment Guidance, The Scottish Government 2008 (Extract)
3. Scottish Planning Policy, The Scottish Government, 2010
4. Planning Advice Note PAN 2/2010 'Affordable Housing and Housing Land Audits'. The Scottish Government, 2010 (Extract)
5. Scottish Planning Policy 3 'Planning for Homes' (Revised 2008) (Extract)
6. Scottish Planning Policy 3 'Planning for Homes' (Revised 2008), Annex A (Extract)
7. Glasgow and the Clyde Valley Strategic Development Planning Authority, March 2009, Housing Land Audit Guidance Notes Draft 2009
8. Glasgow and the Clyde Valley Strategic Development Planning Authority, 'Urban Capacity Study Issues Report 2009'
9. Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, Background Report 13, Urban Capacity Study 2009 (Extract)
10. National Planning Framework for Scotland 2. The Scottish Government, 2009 (Extract)
11. East Renfrewshire Council's Local Plan Examination Report, September 2010 (Extract)
12. Letter from the Chief Planner 'Providing an Effective Supply of Land for Housing', 29 October 2010
13. Housing Need and Demand Assessment Guidance. The Scottish Government, 2008 (Extract)
14. Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, Background Report 12, Housing Need and Demand Assessment, Technical Appendix TA01 'A Housing Market Area Framework' (Extract)

Issue 17	Effectiveness and Additional Housing Land	
Development plan reference:	Section 4 Spatial Development Strategy Sustainable Framework 3 Sustainable communities	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E6 Quarriers E8 Taylor Wimpey UK Ltd E9 Wallace Land E10 CALA Homes/ Taylor Wimpey UK Ltd E12 Cemex UK Ltd. E14/1 Land Synergy E15/1 Bellisle Developments Ltd E18 Wm. Short esq E19 Duchal Estate E20 H. J. Paterson E23 Scottish Property Federation E24 Banks Group E29/2 Ogilvie Homes Ltd E30 NHS Greater Glasgow & Clyde E31 Caledonian Properties E34 James Barr Ltd E35 Messrs Keith & John Lawrence E42/2 Lynch Homes E42/4 Lynch Homes E45/2 CALA Homes (West) E45/4 CALA Homes (West) E46/1 Susan Barnes (Landowner) E46/2 Susan Barnes (Landowner) E46/4 Susan Barnes (Landowner) E49/5 Jackton & Thorntonhall Community Council E50 Hometown Foundation E51/1 Scottish Government (Directorate for the Built Environment) E52/13 Mactaggart and Mickel (Homes) Ltd. E53/1 SRG Estates E55/4 Homes for Scotland</p>		
Provision of the development plan to which the issue relates:	Schedules 6 (page 43), 7 (page 43), 8 (page 44) and 9 (page 45) Paragraphs 4.65 (page 40) - 4.86 (page 49)	
Planning authority's summary of the representation(s):		
<p>This issue relates to representations which question the effectiveness of the housing land supply and/or request the provision of additional land for housing. The issue is articulated in various ways by different respondents.</p> <p>Relevant individual representations are summarised:</p>		

E6 Quarriers

This representation is concerned that there are no options for the delivery of new land for private housing outside the context of brownfield regeneration opportunities. It raises five main points:

- no apparent comprehensive assessment of the deliverability of existing supply;
- a singular reliance on brownfield development;
- theoretical oversupply of market housing;
- backlog in affordable housing provision;
- need to deliver land for affordable housing and the role that private housing plays enabling that development.

E8 Taylor Wimpey UK Ltd.

This representation considers that there is an urgent need to address the issue of effectiveness of housing land supply including:

- questioning the lack of progress on Community Growth Areas to 2025;
- non-effective nature of sites within the land supply;
- non-effective nature and market conditions within Clyde Gateway;
- use of last 5 years completion sites as a proxy for the next 15 years; and
- urgent need for affordable and intermediate housing either provided by, or cross-subsidised by, the private sector;
- The representation also objects to the non identification in the conurbation of any additional housing land to 2025.

E9 Wallace Land

This representation is concerned that the Proposed Plan establishes a position that there is no need for any new strategic land releases; that there is continued reliance on the Urban Capacity Study; and that the strategy that flows from this position does not serve to deliver 'a generous supply of land for housing' or 'give the flexibility necessary for the continued delivery of new housing' as required by Scottish Planning Policy.

E10 CALA Homes/ Taylor Wimpey UK Ltd

This representation has similar concerns to Wallace Land (E9). It also highlights ongoing delay in delivery of residential units at some Community Growth Areas such as South Wishaw and Larkhall/Ferniegair.

E12 Cemex UK Ltd.

The Proposed Plan's reliance on sites identified in the 2009 Housing Land Audit and 2009 Urban Capacity Study over-estimates the amount of effective housing land and its deliverability. The 2009 Housing Land Audit was based on pre-recession data and whilst account has been taken of the changed economic climate, the 'effectiveness' of a number of sites must be called into question.

Community Growth Areas are included in Housing Land Audits and these large-scale residential led developments have been difficult to deliver. The potential future supply identified in the Urban Capacity Study faces even greater uncertainty – a number of sites carry inherent risks in deliverability and raise issues such as ownership, contamination and physical constraints as identified in Planning Advice Note 2/2010.

The representation also refers to the response by Homes for Scotland to the Main Issues Report consultation, which assessed the effective land supply and concluded that there was a significant shortfall in supply.

The representation raises “serious concerns therefore with the methodology and assumptions upon which the Housing Need and Demand Assessment and Spatial Development Strategy is based. Within the context of continued uncertainty in the housing market and conflicting conclusions about projected housing completions, it is suggested that reference to surplus of housing land to meet private sector demand be removed from the Plan.”

E14/1 Land Synergy, E15/1 Bellisle Developments

These representations consider that it is likely that the effectiveness of the housing land supply has been significantly overestimated by the Strategic Development Planning Authority and a great many sites previously considered to be effective are no longer financially viable. The following main points are raised:

- If there is an abundant effective supply then the current backlog of need would not be so great.
- The Urban Capacity Study reconsidered all non- and part-effective sites identified in the Housing Land Audit therefore creating an overlap between the supply set in each.
- The Urban Capacity Study has not subjected each site to the tests of effectiveness as set out in Planning Advice Note 2/2010.
- While a commitment to bring forward sites already allocated/identified in existing local plans is accepted, these should be supplemented by a range of new sites that have the potential to deliver quickly as and when required, in the event that the committed sites fail to deliver on schedule or in the event that some of the committed sites do deliver and demand has increased following the easing of lending restrictions. This would ensure a flexible and robust housing land supply that can adapt as circumstances change, as required by Scottish Planning Policy.
- While the Strategic Development Plan proposes a degree of flexibility to bring forward additional sites as and when they are required, this may not be sufficient and the identification of additional clean and genuinely effective sites from the outset would far more likely result in the delivery of sufficient housing.

E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson, E34 James Barr Ltd, E35 Messrs Keith & John Lawrence

These representations consider that the Proposed Plan does not take account of the current difficulties in delivering the established housing land supply and considers that the Strategic Development Plan’s housing targets are unlikely to be met unless this issue is addressed at the strategic level. The representations refer to comments in the Chief Planner’s letter (October 2010) and consider that these comments have not been reflected in the Proposed Plan. The Plan should:

- include additional housing land release, revisiting Schedules 8 & 9 to reflect this;
- introduce flexibility for future housing land allocations;
- acknowledge the delays facing the deliverability of Community Growth Areas;

- specify the vital role that smaller, more deliverable sites could play in meeting housing needs early in the plan period.

E23 Scottish Property Federation

Broadly supports the aspirations for growth, “however there is concern amongst members that the aspiration for growth is not supported by the housing allocations and some members advise that there is an undersupply of housing to 2025. For example, in the current climate only the sites that are viable with little risk will be developed, leaving many of the strategic sites, which the Glasgow and the Clyde Valley Strategic Development Planning Authority is relying on to come forward, as undevelopable. There is concern that the Community Growth Areas are ineffective and identifying them for development in the short-medium term will artificially inflate housing supply. We would suggest that the Local Development Plans be encouraged to bring forward smaller effective sites to make up for the larger constrained sites. We support Homes for Scotland on their views on this issue.”

E24 Banks Group

The following main points are raised:

- The Plan does not reflect the Chief Planner’s letter (29th October 2010) which requested that planning authorities review the effectiveness of their current housing land supply and that they should consider bringing forward more effective opportunities.
- Development of brownfield sites has become less feasible in the current financial climate due to remediation costs and funding difficulties often associated with such sites. Many of these sites, including sites in the existing established housing land supply and indeed within the effective supply, are unlikely to be effective in the current financial climate. This potential constraint to the development of such sites should be recognised in the Strategic Development Plan.
- 6,000 house completions per annum is not regarded as ambitious.
- Circular 2/2010 (Planning Advice Note 2/2010) makes it clear in paragraph 62 that windfall sites cannot be regarded as part of the planned housing requirement and can only be considered effective once planning applications are approved.
- The use of an Urban Capacity Study which continues to contain sites which cannot be revealed to the public in the Background Report is highly unsatisfactory.
- There is no evidence of a more generous housing land supply; much more flexibility should be given to Local Development Plans to deal with this.
- Consideration needs to be given to the release of additional land in more effective locations to accommodate the short term impact of the current economic recession achieved through a combination of medium sized sustainable locations and by a more liberal approach to small scale locations of under 50 houses which are not classed as major development.
- The respondent does not see any reason why substantial progress cannot be made within the next 2 years on the Gartcosh/Glenboig Community Growth Area, where the respondent has an interest.

E29/2 Ogilvie Homes Ltd

The following main points are raised relating to additional land release:

- Serious concerns over the failure to identify any additional strategic land releases for private sector housing in the period up to 2025.
- Shares the concerns raised by Homes for Scotland that the Glasgow and the Clyde Valley Strategic Development Planning Authority takes an overly pessimistic view of Housing Need and Demand and an overly optimistic view of existing effective housing land.
- Approach is contrary to Scottish Planning Policy and National Planning Framework for Scotland 2 and the Government's specific objective to provide a 'generous' supply of effective housing land (giving flexibility) to meet identified housing requirements across all tenures and the need to maintain a 5 year effective supply of housing at all times.
- "We would suggest that there is a need for a proper and realistic reappraisal of the likelihood of resolving constraints on existing strategic allocations, as well as the need to identify additional effective housing land throughout the Glasgow and the Clyde Valley Strategic Development Plan area. The proposal to identify no new strategic housing land allocations in the period to 2025 must be reconsidered. The release of further effective housing land in marketable, accessible, sustainable and viable locations is therefore required and these must be capable of delivery throughout the plan period."

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties

(In response to paragraph 4.71) There are a number of National Health Service properties that will become surplus to requirements during the period of the Proposed Plan, and it is considered that these will contribute to the city-region's economic growth and quality of life. It is also considered that triggers should be identified for the release of future phases of effective sites where a 5 year effective supply is not being maintained. Additional land should be identified for housing above and beyond that identified over the plan period. By identifying additional land then it would maintain flexibility in the land supply.

E31 Caledonian Properties

States that it is inevitable that some larger and more complicated sites such as the Community Growth Areas are likely to be unviable or difficult to fund during the plan period. It is our opinion that additional sites should be allocated to compensate against this and ensure that flexibility is retained moving forward. It is considered that there is reliance by the Glasgow and the Clyde Valley Glasgow Strategic Development Planning Authority on these sites and there should be a strategy in place to ensure that if these sites are not delivered then a mechanism is in place to allow for other sites to be brought forward.

E42/2 Lynch Homes, E45/2 CALA Homes (West)

These representations consider that the Proposed Plan does not make clear the assumption that all of the sites in the land supply in the Urban Capacity Study (over 100,000 homes) are assumed to be effective over the plan period. No evidence has been provided by the Glasgow and the Clyde Valley Strategic Development Planning Authority to confirm effectiveness and as such, the conclusion reached that no further land supply is needed for private housing is

fundamentally flawed as well as contrary to the requirements in Scottish Planning Policy.

These representations also consider that the Proposed Plan should discount the Urban Capacity Assessment as part of the effective land supply to meet the strategic housing requirement and seek its allocation as part of the effective land supply.

E42/4 Lynch Homes, E45/4 CALA Homes (West)

These representations raise the following main points:

- There has been a lack of proper assessment of the future effective housing land supply across the region leading to the conclusion that no further housing land supply should be released over the period to 2025.
- The Spatial Development Strategy is founded on the premise that the sites identified in the Urban Capacity Study can become effective over the plan period, 100,000 units, which they consider not to be tenable because Urban Capacity Study sites have not been tested as being effective and these sites have not been agreed by the private housebuilders as capable of being developed. The Urban Capacity Study needs to prove that its potential land supply can be effective, which is best done by Local Authorities allocating all effective Urban Capacity Study sites in Local Development Plans in accordance with Planning Advice Note 2/2010.
- The Plan does not accord with Scottish Planning Policy Paragraph 72 which sets out the information requirements to be reported in the Proposed Plan. It is considered that Schedules 6 – 9 do not accord with the requirements of Scottish Planning Policy, methodology in Planning Advice Note 2/2010 and the Housing Need and Demand Assessment Guidance. The representations propose a replacement Schedule 6, deletion of Schedules 7 – 9, and a replacement schedule 7. These proposed changes would: remove the tenuring of the land requirements; use a draft 2010 Housing Land Audit as the base; and exclude all capacity identified in the Urban Capacity Study because it has not been assessed against Planning Advice Note 2/2010.
- A replacement Schedule 6 is proposed that does not differentiate land requirements by tenure; is derived from a draft 2010 Housing Land Audit; uses different time periods to those in the Housing Need and Demand Assessment; and presents all tenure annual requirement. It also provides annualised housing requirements which can be used to provide estimates of housing growth over the longer term period to 2033 (20 year) required by Scottish Planning Policy, which is omitted from the Proposed Plan. It provides an estimate of strategic housing requirements for the region and its constituent authorities – this key target is not included in the Plan.
- The replacement Schedule 7 proposed identifies annual shortfalls and scale of housing allocations necessary to Year 7 for all tenures by Local authority, which is omitted from the Proposed Plan.

E46/1 Susan Barnes (Landowner)

Sufficient scope should be provided for local planning authorities to allocate local-scale development to locations outwith the defined core areas. The majority of the Community Growth Areas remain undeveloped since their identification in the 2006 Structure Plan and therefore will form a significant contribution to the

housing land requirement over the Strategic Development Plan period. The general location of the core strategic growth areas (Community Growth Areas) is not disputed; however, progress has been and will continue (over the next 5 years) to be slow, therefore the scope for local flexibility and additional sites should be clarified within the Proposed Plan to ensure a clear and transparent framework for the planning system in the West of Scotland. The scope for local-scale housing development proposals to 'support the local centre' is accepted in the Strategic Development Plan ('Diagram 4') but an additional sentence should be added to clarify that local-scale development can provide flexibility and a deliverable supply of land, whether for private or affordable housing, on the basis that it is well located in relation to the centre.

E46/2 Susan Barnes (Landowner)

The importance of the identified Community Growth Areas is not disputed but given the on-going delays and implementation issues associated with these large-scale development areas, clarification should be given to ensure that there remains scope for localised development. The representation considers that the Proposed Plan should acknowledge the role for suitably-scaled development (predominantly housing or mixed-use) in supporting and providing sufficient space to grow for local communities.

E46/4 Susan Barnes (Landowner)

The Proposed Plan makes no additional strategic housing allocations due to the focus on delivery of the Community Growth Areas; however deliverability of these areas will remain a critical issue. Local Authorities should be given clearer guidance to ensure housing land supply is maintained and they have scope to allocate land outwith these areas as necessary.

E49/5 Jackton & Thorntonhall Community Council

Consider that a generous supply of housing land has been identified in the Proposed Plan therefore there can be no benefit to housebuilders or any other party in identifying even more supply. The problems currently facing the house building industry do not stem from a lack of developable land but from a lack of demand. Increasing land supply would be more likely to exacerbate this situation since it would tend to drive down the market value of the existing land bank thereby threatening the financial stability of the sector.

E50 Hometown Foundation

Potential for not satisfying housing land requirements should be recognised, especially Community Growth Areas at Carluke & Larkhall, so that alternatives can be considered. It is considered that a review of the effectiveness of some sites is undertaken. It is not accepted that there is no strategic requirement to 2025 for additional land.

E51/1 Scottish Government (Directorate for the Built Environment)

Note that Table 7 (Schedule 6 our correction as no Table 7 in Proposed Plan) anticipates 108,000 planned private sector completions 2009-25. From earlier discussions we have gathered that this figure assumes the entirety of the established supply will become available for development within the plan period, but it is not clear from the plan or supporting documents we have seen. We recommend that the reporter clarifies this point and satisfies themselves that this

figure is based upon a realistic assessment of the likely deliverability of sites that may be in the established supply, but are not currently effective.

E52/13 Mactaggart and Mickel (Homes) Ltd.

The following main points are raised:

- The private sector requirement remains too cautious and does not follow government guidance in seeking to provide a generous housing land supply.
- A significant number of Community Growth Areas are currently not effective and will remain so for the foreseeable future.
- Shorter term completions are required by smaller settlement extensions that are not dependent upon key infrastructure investment.
- Further effective housing land is required to be planned for in terms of supply to meet short to medium term demand over the initial first seven year period from 2008-15. Local Development Plans should be allowed to select growth options that reflect local circumstances.
- Significant reliance on the Urban Capacity Study as detailed in paragraph 4.75, whilst indicating a significant number of units can come forward, at present many of these sites are constrained and are not effective.

E53/1 SRG Estates

The following main points are raised:

- Additional land (especially outwith Community Growth Areas) must be allocated to encourage development in a depressed market.
- Large scale sites are inherently fraught with deliverability difficulties. The current economic climate, which has resulted in a well-documented downturn in housing completions, has simply exacerbated the problems faced by such sites in the short to medium term.
- Where allocations cannot be deemed effective in the short term, it is vital that supplementary alternative proposals/strategies are identified at a strategic level in order to avoid resultant unmet demand.

E55/4 Homes for Scotland

The following main points are raised:

- Has no objection to the demographic and economic projections which form the basis of the Plan, or to the assessment of demand and need contained in the Housing Need and Demand Assessment.
- Does not seek changes to the numerical basis of the housing policies. It does seek a different presentation of the requirements and supply to ensure that local planning authorities genuinely have the flexibility and discretion, as implied by Part 1 of the Plan, to identify effective housing land to meet needs and demands across all tenures.
- Does not fully agree with paragraph 4.71 – while higher population projections than those provided by GROS (General Register Office for Scotland – now part of National Records of Scotland) are elements of flexibility, backlog need and discounting windfall sites are not.
 - Housing Need and Demand Assessment Guidance is clear that backlog need is part of the core projection of need and therefore cannot be considered flexibility.
 - Planning Advice Note 2/2010 states in paragraph 62 that windfall

sites are not part of the planned housing supply, should not be counted towards meeting the housing requirement, and are only effective once planning consent is granted. The implication is that the Plan expects effective housing land supplies to be augmented in practice by windfall; however, this does not conform to the requirement in Scottish Planning Policy that there is a 'generous' land supply actually allocated in the development plan.

- It would be helpful to know how much additional flexibility the Glasgow and the Clyde Valley Strategic Development Planning Authority actually believes is built into the Housing Need and Demand Assessment projections, as this information is not quantified anywhere. Our position is that the Housing Need and Demand Assessment projections are a starting point, onto which additional flexibility is built by the provision of a generous allocated land supply.
- Disputes the assumption made about available land supply, in particular the Plan's assertion that it already knows where all necessary housing land can be found for the next 20 years.
- Acknowledges that 2009 Housing Land Audits were prepared to reflect the economic circumstances and were audited by Homes for Scotland; and that 2009 Urban Capacity Study is an established methodology that includes all the established but not yet effective sites from the audits, as well as an assessment of potential from other sources. However, rejects the assertion in the Proposed Plan that the Urban Capacity Study is a sound basis for saying there will be sufficient effective land to meet requirements for the next 20 years; it is the role of Local Planning Authorities to validate future effective supply beyond that agreed in Audits as effective for the next seven years.
- Considers that Homes for Scotland had no active part in preparing the Urban Capacity Study; the proportion of the established supply from the 2009 audits which is non-effective has risen from 48-62%; other sources of assumed capacity are not identified in detail and cannot therefore be verified; the Urban Capacity Study is an estimate of supply, it follows that these estimates have to be validated in order for their contribution to meeting needs to be proved; validation must involve applying the tests of Planning Advice Note 2/2010 to land proposed to be allocated in Local Development Plans (10 years effective supply from date of adoption).
- Assumed sufficiency at a Strategic Development Plan level in fact masks considerable variations by Council area.
- Document HFS2, submitted in support of the representation, sets out Local Authority requirements and supply – the close correspondence of figures questions if this represents 'generous' land supply.
- Document HFS3, submitted in support of the representation, makes reference to research by Turley Associates that typically some 25-30% of assumed housing land supplies never come to fruition (Holder, Robin and Pickles, Helen, Turley Associates (2008) "The Effectiveness of Housing Land Audits in Monitoring Housing Land Supply in Scotland". Edinburgh: The Scottish Government Social Research).
- Taking into account figures for affordable need it is difficult to understand why the need for additional land for affordable housing is not an issue on

which the Strategic Development Plan gives guidance.

- Excessive emphasis on brownfield land and regeneration without sufficient regard to achieving a range and choice of housing types and residential locations.
- Document HFS1, submitted in support of the representation, sets out an analysis (based on the draft 2009 Housing Land Audits), of requirements and supply using an approach which is in conformity with Scottish Planning Policy.
- Homes for Scotland agrees with paragraph 4.86 that it is for local authorities to determine their respective housing supply targets and associated housing land requirements in their Local Housing Strategies and Local Development Plans.

The following representations indicate that they endorse and support the views of Homes for Scotland: E9 Wallace Land; E10 Cala Homes and Taylor Wimpey; E23 Scottish Property Federation; E29/2 Ogilvie Homes Ltd.

Modifications sought by those submitting representations:

E6 Quarriers

No specific modification sought in relation to effectiveness.
(Related aspects are dealt with in Issue 13 Green Belt).

E8 Taylor Wimpey UK Ltd.

There is an urgent need for this Plan to address the issue of effectiveness. Support is expressed for Paragraphs 4.87 and 4.89, which outline the circumstances for Local Authorities to release additional land. No specific modification sought.

E9 Wallace Land

No specific modification sought.

E10 CALA Homes/ Taylor Wimpey UK Ltd

No specific modification sought.

E12 Cemex UK Ltd.

A more flexible approach should be adopted in the forthcoming Plan, recognising the inherent uncertainties in the current housing market and the impact this has upon local authorities' ability to maintain an effective 5-year housing land supply. In particular we would suggest that reference to a surplus of effective and established land to meet private sector housing demand should be removed from the Plan to reflect the continued uncertainty in the deliverability of the established land supply during the Plan period.

E14/1 Land Synergy, E15/1 Bellisle Developments Ltd

The Strategic Development Plan should provide a generous supply of new effective sites from the outset of the plan period which will assist in the maintenance of a continuous effective supply of housing land and the realisation of the spatial development strategy.

(Related aspects are dealt with in Issue 20 Generous Land Supply).

E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson

The Proposed Plan should take account of the current difficulties in delivering the established housing land supply. Schedules 8 and 9 in particular should be revised to include additional housing land release. The Plan should also be modified to introduce flexibility for future housing land allocations, acknowledge the delays facing Community Growth Areas as well as specifying the vital role that smaller, more deliverable sites could play in meeting housing needs early in the plan period, while both public and private expenditure remains constrained.

E23 Scottish Property Federation

The Plan's aspiration for growth is not supported by the housing allocations and some members advise that there is an undersupply of housing to 2025. There is concern that the Community Growth Areas are ineffective and identifying them for development in the short-medium term will artificially inflate housing supply. Local Development Plans should be encouraged to bring forward smaller effective sites to make up for the larger constrained sites.

E24 Banks Group

Many brownfield sites are unlikely to be effective in the current financial climate. This potential constraint to the development of such sites should be recognised in the Strategic Development Plan. Consideration needs to be given to the release of additional land in more effective locations to accommodate the short term impact of the current economic recession. This should be achieved through a combination of medium sized sustainable locations and by a more liberal approach to small scale locations of under 50 houses which are not classified as major development. Local Development Plans should be given more flexibility to provide a generous housing land supply.

(Related aspects are dealt with in Issue 20 Generous Land Supply).

E29/2 Ogilvie Homes Ltd

- We would suggest that there is a need for a proper and realistic reappraisal of the likelihood of resolving constraints on existing strategic allocations, as well as the need to identify additional effective housing land throughout the Strategic Development Plan area.
- The proposal to identify no new strategic housing land allocations in the period to 2025 must be reconsidered. The release of further effective housing land in marketable, accessible, sustainable and viable locations is therefore required and these must be capable of delivery throughout the plan period.

(Related aspects are dealt with in Issue 20 Generous Land Supply and Issue 24 Housing Land Additions: Specific Locations).

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties

The Glasgow and the Clyde Valley Strategic Development Planning Authority should identify additional land for housing above and beyond that identified over the plan period. By identifying additional land it would maintain flexibility in the land supply.

(Related aspects are dealt with in Issue 20 Generous Land Supply and Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

E34 James Barr Ltd, E35 Messrs Keith & John Lawrence

Include additional housing land release and amend Schedules 8 and 9 and related text accordingly. Further flexibility required in relation to housing land allocations i.e. a requirement for further private sector housing land release is required.

(Related aspects are dealt with in Issue 20 Generous Land Supply).

E42/2 Lynch Homes, E45/2 CALA Homes (West)

- Discount the Urban Capacity Study as part of the effective land supply to meet the strategic housing requirement and seek its allocation as part of the effective land supply.
- Paragraph 4.71 delete existing text and replace with the following:

“The overall strategic housing requirement for all tenures is shown in Schedule 6.

Local Development Plans are expected to allocate sufficient land to meet these requirements and to maintain a 5 year land supply at all times.

Councils will undertake appropriate assessments to ensure that all sites to be allocated are effective in accord with Scottish Government guidance and to assess the level of completions expected from these allocations and effective land supply to ensure that the 5 year land supply is maintained at all times.

Councils have undertaken an Urban Capacity Study. Any sites which are effective should be allocated in the Local Development Plans. This will provide a valuable source of brownfield land in accord with the strategy.

These approaches will ensure flexibility in the Strategic Development Strategy.”

(Related aspects are dealt with in Issue 20 Generous Land Supply).

E42/4 Lynch Homes, E45/4 CALA Homes (West)

These representations propose the following modifications:

- 4.70 delete from the first sentence “..the private sector”
- 4.71 (duplicate modification to E42/2 & E45/2 above)
- 4.72 delete from the second sentence “Considerable...” and replace with “However, it needs to recognise that limited...”
- 4.72 add at the end of the paragraph:
“As required by Scottish Planning Policy, Schedule 7 details the scale of land release to be allocated in the Local Development Plans to Year 7. Local Development Plans are advised to adopt the annualised estimate of the strategic housing requirement to assess the housing shortfalls and allocations needed over the 10 year plan period.
“Local Development Plans should through the Local Housing Strategy adopt the findings from the Housing Need and Demand Assessment to assess Local Housing Needs and any affordable housing shortfall. If a shortfall is identified then an affordable housing policy is appropriate.
“Local Development Plans can allocate land for affordable homes to help deliver the Strategic Development Strategy.”
- 4.77 delete paragraph and replace with “Having determined the strategic housing requirement for each local authority area, Schedule 7 (amended) details the scale of housing allocations to be met by site allocations to year 7 as required by Scottish Planning Policy. This is based on the effective

land supply in the latest Housing Land Audit (2010). Windfall sites are not included in this land supply assessment. The land identified in the Urban Capacity Study has not been agreed effective and therefore cannot be included in this land supply. Land which is part of the Urban Capacity Study can be allocated in the Local Development Plans it can be demonstrated that these are effective in the relevant plan period.”

- Delete Schedules 7, 8 and 9 and replace with new Schedule 7 before paragraph 4.77.

Schedule 7: Housing Shortfalls to Year 7

Local Authority	Housing Shortfalls to Year 7		
	Annualised Housing Requirement to Year 7 (i)	Effective Housing Supply (ii)	Housing Shortfall
East Dunbartonshire	4,065	1,110	2,955
East Renfrewshire	2,129	1,329	800
Glasgow City	36,700	18,024	18,676
Inverclyde	1,905	2,171	0
North Lanarkshire	9,376	6,515	2,861
Renfrewshire	4,868	4,311	557
South Lanarkshire	12,559	9,728	2,831
West Dunbartonshire	1,739	1,968	0
GCV total	73,340	45,156	28,679

**Source: (i) Strategic Housing Requirement (Schedule 6)
(ii) Assessed from 2010 Housing Land Audits as approved (2009 HLA for East Dunbartonshire)**

Replace Schedule 6 with revised Schedule 6 (this revised Schedule 6 is also referred to in E42/2 above).

Schedule 6 (amended): Housing Requirements

Local Authority	Housing Requirement to Meet Housing Need & Market Demand						
	7 Year 2013-20			12 Year 2013-2025			Annual Requirement
	Market	Affordable	Total	Market	Affordable	Total	
East Dunbartonshire	1,718	3,650	5,368	2,118	4,850	6,968	581
East Renfrewshire	1,400	1,750	3,150	1,700	1,950	3,650	304
Glasgow City	16,164	26,850	43,014	26,164	36,750	62,914	5,243
Inverclyde	891	2,175	3,066	991	2,275	3,266	272
North Lanarkshire	9,673	0	9,673	16,073	0	16,073	1,339
Renfrewshire	5,282	363	5,644	7,982	363	8,344	695
South Lanarkshire	10,055	7,675	17,730	12,555	8,975	21,530	1,794
West Dunbartonshire	1,782	0	1,782	2,982	0	2,982	248
GCV total	46,964	42,463	89,426	70,564	55,163	125,726	10,477

Note: Based on Planning Scenario/High Affordability including lower estimate of Backlog of Need

(Related aspects are dealt with in Issue 22 All Tenure Housing Requirement).

E46/1 Susan Barnes (Landowner)

Page 6, Diagram 4 'Supply-side: Sustainable Location Assessment', 'Network of Centres' add sentence: "Providing local-scale development opportunities that are, or can be, sustainably linked with existing local centres."

E46/2 Susan Barnes (Landowner)

Add sentence at end of paragraph 4.15: "It is recognised that Community Growth Areas will require to be augmented by local-scale development at local centres, proposals for which should be considered by local planning authorities on their planning merits".

E46/4 Susan Barnes (Landowner)

Add sentence, prior to last sentence of paragraph 4.75, page 42: "...subject to local planning authorities augmenting supply when necessary with suitably scaled allocations at local centres."

E49/5 Jackton & Thorntonhall Community Council

No specific modification sought.

(Related aspects are dealt with in Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

E50 Hometown Foundation

- The plan should recognise the potential for such development (Owenstown) as part of the development strategy in bringing forward alternatives to the established Community Growth Areas or allocated sites if some of these are not effective or delayed in delivery. In particular, the Community Growth Areas identified at Carluke and Larkhall have been slow to come forward and the potential for not satisfying housing land requirements should be recognised by the plan so that alternatives can be considered. The phased development of a new settlement could deliver this requirement should existing identified locations not be effective.
- In order to maintain choice and encourage new investment and growth the lack of any strategic requirement to 2025 for additional land to be identified is not accepted.

(Related aspects are dealt with in Issue 23 Definitions of Intermediate Housing and Affordable Housing)

E51/1 Scottish Government (Directorate for the Built Environment)

- We suggest that the Reporter invites the Glasgow and the Clyde Valley Strategic Development Planning Authority to revisit its housing requirement to 2025 to take account of all tenures. In doing so the outputs of the Housing Need and Demand Assessment should be the starting point, but other factors including realistic prospects for the housebuilding industry, for growth, and for the availability of public subsidy to support affordable housing may also be taken into account. The Glasgow and the Clyde Valley Strategic Development Planning Authority should then be invited to identify a housing land requirement more than sufficient to accommodate this target (i.e. incorporating a generosity allowance), and taking account of a realistic assessment of the proportion of the established supply likely to become effective by 2025.

- If the Reporter concludes from this exercise that the Proposed Plan does not deliver a generous supply of housing land, then we suggest that Schedule 9 of the Plan is reworked to identify the shortfall in each sub-market area (and including a distribution of mobile demand) and a requirement included in the Plan for the eight planning authorities to allocate land to meet these shortfalls through their Local Development Plans.

(Related aspects are dealt with in Issue 19 Housing Market Areas, Issue 20 Generous Land Supply and Issue 22 All Tenure Housing Requirement)

E52/13 Mactaggart and Mickel (Homes) Ltd.

- Requests a strategic plan that is consistent with government planning policy.
- Provide for allocations throughout each council area to ensure that effective housing opportunities are realised and that a generous housing land supply is maintained at all times throughout the plan area and over the plan period.

(Related aspects are dealt with in Issue 20 Generous Land Supply)

E53/1 SRG Estates

Where allocations such as the defined Community Growth Areas cannot be deemed effective in the short term, supplementary proposals/strategies should be identified at the strategic level. This would allow for sustainable housing development to come forward outwith the Community Growth Areas and placate housing need and demand in the short term.

E55/4 Homes for Scotland

- Paragraph 4.72 second sentence delete “considerable” and replace with “some”. Add a final sentence: “Mixed sustainable communities also depend on a variety of locations and types of land being identified, including a mix of brownfield and greenfield.”
- Paragraph 4.75 delete third sentence and replace with: “These sources of supply represent the locations which Local Authorities should consider first when identifying land through the Local Development Plan. Local Development Plans must allocate a generous supply of land to meet requirements which is effective or capable of becoming effective, and should ensure through monitoring the maintenance of a minimum 5-year effective housing land supply at all times.”
- Paragraph 4.78 delete first sentence and replace with: “The projections of need are higher in the earlier period because the Housing Need and Demand Assessment has identified backlog need.”
- Paragraph 4.84 delete first two sentences and replace with: “The intermediate sector potentially is part of the wider approach to meeting affordable housing needs. Local Authorities will assess the overall scale of housing land required to meet all needs, but should note that some households who can access intermediate housing may be more mobile than those in the social-rented sector. Some flexibility in land allocations may be needed to reflect this.”

(Related aspects are dealt with in Issue 20 Generous Land Supply, and Issue 22 All Tenure Housing Requirement)

Summary of responses (including reasons) by planning authority:

General

These representations question some aspects of the effectiveness of the housing land supply and consequently seek additional housing land release to meet the economic and household forecasts and projections underpinning the Proposed Plan.

In addressing the issue of effectiveness, the Glasgow and the Clyde Valley Strategic Development Planning Authority is satisfied with the accuracy of its assessment of the effectiveness of the housing land supply, and maintains its view that there is not a need for additional strategic land releases for private sector housing. The Proposed Plan concludes that there is a surplus of housing land already identified through the Housing Land Audit and Urban Capacity Study to 2025.

This is challenged by the representations, based on arguments relating to

- Over-optimistic assessment of 'effectiveness'
- Over-reliance on Community Growth Areas, although most representations accept the role of the Community Growth Areas in the longer term.

It should be noted that although the effectiveness of the land supply is questioned, most representations accept the assessment of future demand.

Core arguments in the representations

The representations argue that

- Current market circumstances undermine effectiveness and that there is a requirement for additional flexibility
- A more realistic assessment of effectiveness would result in recognition of a requirement for additional strategic housing land release.
- There appears to be an underlying presumption that such additional strategic land release automatically would stimulate additional housing supply and contribute to resolving unmet demand.

Approach to answering the representations

The Authority's response considers these as two sub-issues –

1. Effectiveness
2. Additional Land for Housing.

Effectiveness is examined in relation to three components: Housing Land Audit; Urban Capacity Study and Community Growth Areas.

Finally, the response addresses the specific modifications proposed.

It is important to note that many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 – 27. The relationship between the housing issues is detailed in the paper 'Housing Land - A Strategic Overview'.

At the outset, it is also important to recognise that the Housing Need and Demand Assessment, the method to calculate housing requirements, is a new methodology. In the Glasgow and the Clyde Valley area, its Housing Need and Demand Assessment has been declared 'robust and credible' in a letter from the Scottish Government's Centre for Housing Market Analysis in June 2011 (Supporting Document 1). The Scottish Government's Housing Need and

Demand Assessment Guidance (March 2008) (Supporting Document 2, Page 7) explains that where a Housing Need and Demand Assessment is 'robust and credible' its approach will not be considered at examination. Instead the examination will focus on the proposed spatial policies for housing set out in the Proposed Plan and their relationship with the findings of the housing need and demand assessment.

Sub-issue1: Effectiveness

E6 Quarriers; E8 Taylor Wimpey UK Ltd; E12 Cemex UK Ltd.; E14/1 Land Synergy; E15/1 Bellisle Developments Ltd; E18 Wm. Short esq.; E19 Duchal Estate; E20 H. J. Paterson; E23 Scottish Property Federation; E24 Banks Group; E29/2 Ogilvie Homes Ltd; E30 NHS Greater Glasgow & Clyde; E31 Caledonian Properties; E34 James Barr Ltd; E35 Messrs Keith & John Lawrence; E42/2 Lynch Homes; E42/4 Lynch Homes; E45/2 CALA Homes (West); E45/4 CALA Homes (West); E49/5 Jackton & Thorntonhall Community Council; E50 Hometown Foundation; E51/1 Scottish Government (Directorate for the Built Environment); E52/13 Mactaggart and Mickel (Homes) Ltd.; E53/1 SRG Estates; E55/4 Homes for Scotland

The majority of representations challenge the effectiveness of the housing land supply through the Housing Land Audit, Urban Capacity Study and/or the Community Growth Areas.

Effectiveness – Basic Position within the Proposed Plan

- The Authority's position is for a private sector requirement for 97,000 new housing completions by 2025. The Plan has identified land available for 108,000 units, averaging 6,000 completions annually.
- This figure exceeds the projected demand by a surplus of 11,000 units.
- Therefore, there is more than sufficient land available to fulfil demand in the city-region to 2025. The housing land supply used in the Proposed Plan is based on the 2009 Housing Land Audit and the 2009 Urban Capacity Study, which includes the Community Growth Areas identified in the 2006 Structure Plan.

Effectiveness – Meeting the Definition in the Proposed Plan

- 'Effective housing land supply' is defined in Scottish Planning Policy, Glossary (Supporting Document 3), as "The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration, and will therefore be available for the construction of housing."
- In the city-region, the Housing Land Audit considers effectiveness for seven years, to allow two years for adoption of the strategic development plan, whilst providing a five year effective land supply for local development plans, consistent with Scottish Planning Policy, Paragraph 72 (Supporting Document 3).
- Furthermore, Planning Advice Note 2/2010, Paragraph 55, clearly states "To assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing..." (Supporting Document 4). Paragraph 55 identifies seven criteria by which planning authorities can

determine the effectiveness of individual sites in the Housing Land Audit. These are:

- Ownership
 - Physical
 - Contamination
 - Deficit funding
 - Marketability
 - Infrastructure
 - Land use.
- The 2009 Housing Land Audit was undertaken based on these criteria and audited by Homes for Scotland. The resulting agreed position provided the basis for the Private Sector comparison of supply and demand in the Housing Need and Demand Assessment.
 - Two of these criteria, Ownership and Marketability, are worthy of further consideration in current economic circumstances, and may relate to the representations questioning the effectiveness of the land supply.
 - *Ownership*: “the site is in the ownership or control of a party which can be expected to develop it or 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” - there is a strong commercial aspect to this factor which may affect some parts of existing landbanks - even if a site is in a developer’s ownership and has planning consent and has no abnormal physical/infrastructure constraints, it may not in fact be developed if the developer judges that it will not generate a satisfactory return.
 - *Marketability*: “the site, or relevant part of it, can be developed in the period under consideration” - even if a site, under normal circumstances, could be developed in the period under consideration, nothing will happen if the developer judges market vitality to be so low and demand so sluggish that the risk of profitable sales is unacceptable. In this instance alternative sites may not be any more effective than the example given and may not deliver completions any sooner. A key issue here is the level of current actual demand.
 - ‘Established housing land supply’ is defined in Planning Advice Note 2/2010, Glossary, (Supporting Document 4) as “The total housing land supply – including both unconstrained and constrained sites. This will include the effective housing land supply, plus the remaining capacity for sites under construction, sites with planning consent, sites in adopted local development plans and where appropriate other buildings and land with agreed potential for housing development.”
 - The Established Land Supply at 2009 has mostly been included in the Urban Capacity Study although some sites have been excluded due to the 2009 Urban Capacity study being predominantly based on the draft 2009 Housing Land Audits (ref Issue 21 Urban Capacity Study).

Housing Land Audit – Compliance with Scottish Government Guidance

- The annual Housing Land Audit is fully audited with Homes for Scotland.
- Housing Land Audits are an accepted means of monitoring land supply in Scottish Planning Policy (Supporting Document 3) and Planning Advice Note 2/2010 (Supporting Document 4).
- The 2009 Housing Land Audit provides seven years effective housing land to 2016, with most of the remaining established land supply being identified in the Urban Capacity Study.
- At the time of the preparation of the 2009 Housing Land Audit (base date 31st March 2009), the consolidated Scottish Planning Policy had not been published; therefore, the policy framework was provided by Scottish Planning Policy 3 'Planning for Homes' (Revised 2008) (Supporting Document 5).
- Guidance on undertaking Housing Land Audits was found within Scottish Planning Policy 3 Planning for Homes, Annex A Housing Land Audits (Supporting Document 6), as Planning Advice Note 2/2010 had not been published.
- It should be noted that only limited change has occurred between Annex A of Scottish Planning Policy 3 and the Housing Land Audit section in Planning Advice Note 2/2010. References below will relate to Planning Advice Note 2/2010 and Scottish Planning Policy.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority considers its approach to assessing effectiveness is compliant with Scottish Planning Policy and Planning Advice Note 2/2010.
- The Housing Land Audit in the Glasgow and the Clyde Valley Strategic Development Plan area is undertaken by the constituent authorities using jointly agreed 'Housing Land Audit Guidance Notes' (Supporting Document 7) which are consistent with Government guidance and advice.

Housing Land Audit – Consistency and Process

- Liaison meetings throughout the year address problems arising in undertaking the audit and promote consistency in the approach between authorities. This consistency allows annual monitoring of the housing land supply in the city-region to be undertaken within the Housing Market Area framework which operates across local authority administrative boundaries.
- The 2009 Housing Land Audit was undertaken taking into account the changing market circumstances arising from the economic downturn and the reduced capacity of the house building industry.

Housing Land Audit – Trends in the city-region

- Compared to 2008 figures, the 2009 Housing Land Audits revised effectiveness downwards between 5% and 30% (recognising varying circumstances between local authorities).
- The finalised Housing Land Audits were agreed with Homes for Scotland, with only a minor dispute of 4% (1,500 units) of the overall capacity (relating to three local authorities).
- Only 38% of the total land supply was considered effective in 2009

compared with 52% in 2008 and up to 60% in the preceding 4 years. During these discussions, Homes for Scotland recognised that the reduction in effective land supply would also be reflected in demand and capacity of the house building industry.

- The Urban Capacity Study equally was undertaken in the context of depressed market conditions, and authorities took a measured view of the rate of recovery in the housebuilding industry.

Effectiveness – Urban Capacity Study

- The Scottish Government encourages planning authorities to use Urban Capacity Studies to assess opportunities for further housing development within existing settlements, focusing on previously developed land and conversion of existing buildings, and reviewing land currently allocated for uses other than housing. Scottish Planning Policy, Paragraph 81 (Supporting Document 3).
- An Urban Capacity Study in the city-region is undertaken every five years to support the production of the Strategic Development Plan and a Housing Need and Demand Assessment. Some respondents have suggested that the Urban Capacity Study should be subject to the tests of effectiveness identified in Planning Advice Note 2/2010 for undertaking the Housing Land Audit.
- The criteria of effectiveness apply to the five year effective land supply in accordance with Scottish Planning Policy. Urban capacity sites cover a spectrum of current uses and may be subject to confidentiality in terms of their potential change of use and its timing. It is therefore not appropriate - nor is it the intention of the Scottish Government - to apply the criteria of effectiveness to sites identified in the Urban Capacity Study which focuses on housing development in the longer term, 2016-2033 (2016-25 are considered in the housing calculations in the Proposed Plan).
- The Urban Capacity Study has been undertaken consistently and realistically across the constituent authorities and the methodology was the subject of consultation prior to its commencement (Urban Capacity Study Issues Report 2009) (Supporting Document 8).
- The outcomes are detailed in the Urban Capacity Study 2009, Background Report 13 to the Proposed Plan (Supporting Document 9). The Glasgow and the Clyde Valley Strategic Development Planning Authority therefore rejects the view that the Urban Capacity Study should be subject to the criteria of effectiveness identified in Planning Advice Note 2/2010. Further related discussion may be found in Issue 21 Urban Capacity Study.
- Many representations highlight delivery issues because of market conditions. In this context it is worth noting that if the Housing Need and Demand Assessment had focussed on the short term, then projected household growth would have been considerably less than the figures now presented in the Housing Need and Demand Assessment, which reflect longer term conditions. Further related discussion may be found in Issue 22 Generous Land Supply.

Effectiveness – Community Growth Areas

Requests to specifically remove Community Growth Areas are dealt with in Issue 18 - Removal of Community Growth Areas.

- Most representations support Community Growth Areas over the longer term, but question their short or medium term effectiveness, anticipating delayed delivery due to the current economic situation, and abnormal infrastructure or other costs.
- The Community Growth Areas set out in the 2006 Joint Structure Plan (approved by Scottish Ministers on 29th April 2008) with an estimated capacity of approximately 19,000 houses, are a fundamental component of the long term sustainable urban expansion of the city region and make a significant **greenfield** contribution to the land supply (approximately 20% of the Established Land Supply (of which 10% are effective).
- Community Growth Areas were selected to meet the development needs set out in the Glasgow and the Clyde Valley 2006 Structure Plan Technical Report TR6/06 Assessment of Potential Areas for Urban Expansion, April 2006 (Issue 5 Supporting Document 3). Their designation was also a response to the House-building Industry's then appeal for large-scale release in order 'to procure' infrastructure investment. Paragraph 28 of the aforementioned Report highlights the preference has been given to corridors with sustainable transport access, to corridors reflecting the sensitivities of Green Belt and their capacity for significant development of a long term approach creating or enhancing communities.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority recognises that, whilst few of the Community Growth Areas are currently under construction due to current economic conditions, they all have either been integrated into Local Plans, or have been the subject of master planning, or have been granted planning permission. They remain, therefore, a fundamental component of the land supply.
- The Proposed Plan therefore anticipates that Community Growth Areas will contribute substantially to supply in the medium and longer-terms. The **Banks Group (E24)** takes the view that Gartcosh/Glenboig Community Growth Area could see substantial progress within the short term. This difference of view regarding delivery of these growth areas reflects differing judgements within the Industry regarding how quickly stability and confidence will return to markets. Current circumstances in the housing market are unusual and give rise to considerable uncertainty. The land supply will continue to be annually monitored through Housing Land Audits.
- In resisting the numerous representations for substantial additional housing land release, based on the Community Growth Areas being considered largely non-effective in the short-term, the Strategic Development Planning Authority acknowledges that any new releases would require greenfield land. With market recovery, these new alternative housing sites, added to the existing Greenfield land supply, would establish a greenfield land-bank which could undermine the basis of regeneration strategies and community renewal through brownfield land recovery, including National Development Priorities and Community Growth Areas, and diverting from strategy aimed

at sustainable development models and low carbon futures.

- The Glasgow and the Clyde Valley Strategic Development Planning Authority is mindful of the need for a balanced judgement: sustainable economic growth includes enabling the provision of a range of housing to meet various requirements, but it also requires a high quality, enhanced environment where every effort is made to regenerate vacant and derelict land (National Planning Framework for Scotland 2, paragraphs 55, 72-77, 87 and 91) (Supporting Document 10). It is considered that bringing forward significant new sites in the short to medium term would be contrary to the Spatial Development Strategy and the overall vision of the Proposed Plan which has identified a surplus in private sector supply to 2025.

Sub-issue 2: Additional Land for Housing

E8 Taylor Wimpey UK Ltd; E9 Wallace Land; E10 CALA Homes/ Taylor Wimpey UK Ltd; E12 Cemex UK Ltd.; E14/1 Land Synergy; E15/1 Bellisle Developments Ltd; E18 Wm. Short esq.; E19 Duchal Estate; E20 H. J. Paterson; E23 Scottish Property Federation; E24 Banks Group; E29/2 Ogilvie Homes Ltd; E30 NHS Greater Glasgow & Clyde; E31 Caledonian Properties; E34 James Barr Ltd; E35 Messrs Keith & John Lawrence; E42/4 Lynch Homes; E45/4 CALA Homes (West); E49/5 Jackton & Thorntonhall Community Council; E50 Hometown Foundation; E53/1 SRG Estates

- In asserting the ineffectiveness of a proportion of the identified housing land supply, many representations go on to propose additional strategic land release for housing. In some cases this is a general request for additional release, in others specific sites are proposed; small scale releases are requested on what developers deem 'clean' sites that could be developed quickly (**E14/1 Land Synergy; E15/1 Bellisle Developments Ltd; E18 Wm. Short esq.; E19 Duchal Estate; E20 H. J. Paterson; and E23 Scottish Property Federation**); and one specifies release of sites under 50 units (**E24 Banks**). For site specific representations see related Issue 24 Housing Land Allocations Specific Locations.
- This position presumes that such additional strategic land release sites would be more effective than the existing sites identified in the housing land supply and would result in additional units being completed and occupied.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority disagrees with this position and considers that a generous supply of effective land for private sector housing has already been provided through the Housing Land Audit, which has been audited by Homes for Scotland, and through the Urban Capacity Study, comprising sites from the Established Land Supply and Community Growth Areas.
- Even using optimistic household projections, taking account of the in-built flexibility in the Plan, including the exclusion of windfall sites, and revising the housing land supply to reflect depressed economic conditions, a surplus of 11,000 units has been identified by 2025 in the private sector. The question of in-built generosity/flexibility in the underlying assumptions of the Proposed Plan is dealt with under Issue 20 Generous Land Supply.

- It is important to bear in mind that the provision of land for housing does not guarantee more housing completions. Scottish Planning Policy, Paragraph 76 (Supporting Document 3) recognises this: “The delivery of housing does not rely solely on the allocation of appropriate land in the development plan. A variety of other factors are important including the planning application and its determination, negotiation of legal agreements, granting of a building warrant and roads construction consent, water and drainage connection, the capacity of the construction industry and the functioning of the housing market. Most of these factors are outwith the direct control of the planning authority”.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority is satisfied that there is a generous housing land supply as required by Scottish Planning Policy.
- It is accepted that the economic downturn and fiscal restraint may affect deficit funding for more complex regeneration projects and some contributions to affordable provision. But the severity of the change in economic circumstances has been such that construction work on several otherwise attractive and marketable sites in the city-region has simply halted.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority views current market circumstances relating to substantially reduced demand, as a result of various factors including economic uncertainty, insecure labour market, low confidence and lack of mortgage finance, as the key issues. These are not planning issues. This point is supported in East Renfrewshire Council’s Local Plan Examination Report, September 2010, Issue 26, paragraph 28 (Supporting Document 11) where the Reporter concluded that “The main barrier to the uptake of the land supply and consequent delays in programming appear to focus on the capacity of the house-building industry, the current economic climate and the nature of the housing market. These matters are not directly within the control of land use planning.”
- Furthermore, **E49/5 Jackton & Thorntonhall Community Council** also refer to these issues in their representation considering that the problems currently facing the house building industry do not stem from a lack of developable land but from a lack of demand. They consider that increasing land supply would be more likely to exacerbate this situation since it would tend to drive down the market value of the existing land bank thereby threatening the financial stability of the sector.
- It is therefore not clear from the demands for additional strategic land release how a substantial number of different sites will overcome these issues and stimulate demand. This is explicitly recognised by the Chief Planner in his letter to Heads of Planning of 29 October 2010, relating to the provision of an effective supply of land for housing, Paragraph 6 (Supporting Document 12, our emphasis): “Where a planning authority has a 5 year supply of effective housing land but the impediment to developing that site is the general availability of mortgages or low level of demand from purchasers then there will be little if anything to be gained by releasing additional sites.”

- Notwithstanding the above comments, the Glasgow and the Clyde Valley Strategic Development Planning Authority does recognise the current uncertainties in the market, and the difficulties facing the construction sector. In the short term, with constrained development finance, it is recognised that some additional small sites may facilitate developers in re-establishing supply, and this is addressed in the Proposed Plan in Strategic Support Measure 10 (for more detail see Issue 27 Strategy Support Measure 10 Housing and Local flexibility).
- The Glasgow and the Clyde Valley Strategic Development Planning Authority views this approach as a pragmatic response to highly unusual short term circumstances, and would permit local authorities to exercise their detailed knowledge of local market circumstances.
- In conclusion, it is the view of the Glasgow and the Clyde Valley Strategic Development Planning Authority that there is a generous supply within the effective land supply and the Urban Capacity Study to meet the demand projected in the Proposed Plan and therefore there is no requirement for additional strategic housing land release.
- Without a strategic requirement for additional housing land, it is considered that the Local Development Plan is the appropriate vehicle to consider any requirement for additional housing land. Strategic Support Measure 10 'Housing development and local flexibility' gives Local Authorities, where appropriate, the mechanism to augment their private sector supply to 2020 with the release of additional limited scale sites.

Response to specific modifications sought

E12 Cemex UK Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to remove reference to a surplus of effective and established land to meet private sector housing demand in Schedule 6 (page 43) and para 4.84 (page 48).

- A surplus of private sector housing land of nearly 11,000 units at 2025 has been identified in the Housing Need and Demand Assessment and the methodology has been deemed to be 'robust and credible' by the Scottish Government. It is the Authority's view, in line with the explanation above, that there is no shortfall in the private sector land supply and no basis for this modification.

E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson, E34 James Barr Ltd E35 Messrs Keith & John Lawrence

- The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to amend Schedules 8 and 9 to include additional housing land release. As argued above, there is no strategic requirement for additional housing land release and therefore no change is required.

E42/2 Lynch Homes, E45/2 CALA Homes (West)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to replace the text in paragraph 4.71.

- The Proposed Plan has clearly stated why it has not set out a strategic

housing requirement for all tenures, in paragraph 4.80. This is dealt with in greater detail in Issue 22 All Tenure Housing Requirement, while Issue 20 deals with Generous Land Supply.

- It is also considered that paragraph 4.70 outlines the role of the Local Development Plan in ensuring a five year effective land supply. It is not considered necessary for the Proposed Plan to reiterate Scottish Planning Policy to Local Development Planning authorities.

E42/4 Lynch Homes, E45/4 CALA Homes (West)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to paragraph 4.70.

- The Proposed Plan has clearly stated why it has not set out a strategic housing requirement for all tenures in paragraph 4.80. This is dealt with in greater detail in Issue 22 All Tenure Housing Requirement.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to paragraph 4.72.

- The Proposed Plan is clear in its Spatial Vision and Strategic Development Strategy to prioritise brownfield development. It is a fundamental plank of strategic and local planning that there is more than 'limited scope' to alter market perceptions and promote mixed sustainable communities in renewal and regeneration areas. All regeneration and sustainable strategies would fail were there to be such a limitation and experience of strategy since the mid-1970s has demonstrated the scale of opportunity available positively to alter market perceptions and bring market housing into the sustainable development and regeneration process.
- The Proposed Plan is consistent with National Planning Framework for Scotland 2, Paragraphs 85, 87, 89 and 91 (Supporting Document 10).
- It is not considered appropriate for the Proposed Plan, with its focus on Vision and Strategy, to instruct Local Development Plans in regard to Affordable Housing policies. It is the role of the Local Housing Strategy to determine Housing Supply Targets. Local Development Plans are required to accord with the strategy of the Strategic Development Proposed Plan.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed deletion and substitution of Schedules 6, 7, 8, and 9 with corresponding text changes to paragraphs 4.72 and 4.77.

- The Strategic Development Planning Authority's position in regard to All Tenure is detailed in Issue 22 and its position with regard to effectiveness of the housing land supply is detailed above.
- There is no requirement for annualised housing requirements to year 7 in a Strategic Development Plan.
- It is also not considered appropriate to use a 2010 Draft Housing Land Audit when it has not been finalised with Homes for Scotland.
- The Housing Need and Demand Assessment is based on a finalised 2009 Housing Land Audit and the Proposed Plan, as per Guidance, is framed by the results of the Housing Need and Demand Assessment.

E46/1 Susan Barnes (Landowner)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Diagram 4.

- The section 'Network of Centres' refers specifically to retail centres and therefore it is considered inappropriate to make a modification relative to strategic housing allocations for an overtly local planning issue.

E46/2 and E46/4 Susan Barnes (Landowner)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to paragraphs 4.15 and 4.75.

- It is considered that any additional local-scale housing land requirement is dealt with sufficiently through Strategic Support Measure 10 and through Local Development Plans.

E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to paragraph 4.72.

- The Proposed Plan is clear in its Spatial Vision and Strategic Development Strategy to prioritise brownfield development.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to paragraph 4.75.

- It is considered that paragraph 4.70 outlines the role of the Local Development Plan in ensuring a five year effective land supply.
- It is not considered necessary for the Proposed Plan to reiterate Scottish Planning Policy to Local Development Planning authorities.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to paragraph 4.78.

- The Proposed Plan already states clearly in paragraph 4.78 that backlog need has been included, in part, in the private sector projections over the 10 year period (2009-2019) as recommended in the Scottish Government's Housing Need and Demand Assessment Guidance (Supporting Document 13); as a consequence demand is higher in the first planning period (2009-2020).

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to paragraph 4.84.

- The Proposed Plan states, in paragraphs 4.83 and 4.84, that the Intermediate Sector is a potential sector which is a sub-set of the Affordable sector and recognises that some households in this sector may be more mobile than the social-rented sector.
- Details of defining the Affordable sector Housing Market Area can be found in Housing Need and Demand Assessment Technical Appendix TA01 A Housing Market Area Framework, paragraphs 5.1-5.5 (Supporting Document 14)
- Local authorities, through their Local Housing Strategies, will identify Housing Supply Targets for the Affordable sector at the appropriate

geography.

- It is considered that flexibility has been incorporated in Strategy Support Measure 10.

Reporter's conclusions:

Reporter's recommendations: