

**Issue No: 20**

**Issue: Generous Land Supply**

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<b>Issue 20</b>	<b>Generous Land Supply</b>	
<b>Development plan reference:</b>	Section 4 Spatial Development Strategy Sustainable Framework 3 Sustainable communities	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>E8 Taylor Wimpey UK Ltd  E9 Wallace Land  E10 CALA Homes/ Taylor Wimpey UK Ltd  E14/1 Land Synergy  E15/1 Bellisle Developments Ltd  E18 Wm. Short esq.  E19 Duchal Estate  E20 H. J. Paterson  E24 Banks Group  E29/2 Ogilvie Homes Ltd  E30 NHS Greater Glasgow and Clyde  E31 Caledonian Properties  E34 James Barr Ltd  E35 Messrs Keith &amp; John Lawrence  E42/2 Lynch Homes  E42/6 Lynch Homes  E45/2 Cala Homes (West)  E45/6 Cala Homes (West)  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>		
<b>Provision of the development plan to which the issue relates:</b>	Sustainable Framework 3 Sustainable communities (pages 40 to 49)	
<b>Planning authority's summary of the representation(s):</b>		
<p>The main issue relates to respondents questioning the generosity and flexibility of the housing land supply to meet identified housing requirements in the Proposed Plan. The issue is articulated in various ways by different respondents.</p> <p>Relevant individual representations are summarised below:</p> <p><b>E8 Taylor Wimpey UK Ltd</b>  Considers that there is a complete lack of real flexibility in the housing calculations and in remitting any additional releases of unquantifiable scale to the discretion of each Local Authority. This encourages differing attitudes of Councils in reacting to local demand issues; this is not helpful without some kind of strategic context.</p> <p><b>E9 Wallace Land, E10 CALA Homes/ Taylor Wimpey UK Ltd</b>  Concerned that the Proposed Plan establishes a position that there is no need for any new strategic land releases and that there is continued reliance on the Urban</p>		

Capacity Study; the strategy flowing from that 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.

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

Consider that it is likely that the effectiveness of the housing land supply has been significantly overestimated by the Strategic Development Planning Authority; consequently, to accord with Scottish Planning Policy, the Proposed Plan should provide the means of provision of a 'generous' supply of new effective sites from the outset of the plan period.

**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 consider 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, 'Providing an Effective Supply of Land for Housing') and consider that these comments have not been reflected in the Proposed Plan and that as a result the Plan should:

- include additional housing land release, revisiting Schedules 8 and 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.

**E24 Banks Group**

The following main points are raised:

- Considers that the Plan does not reflect the Chief Planner's letter of 29<sup>th</sup> October 2010 ('Providing an Effective Supply of Land for Housing') which requested that planning authorities review the effectiveness of their current housing land supply and that they should consider bringing forward more effective opportunities.
- Does not regard 6,000 house completions per annum as ambitious.
- Considers, in line with Planning Advice Note 2/2010, 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.
- 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.

**E29/2 Ogilvie Homes Ltd**

The Proposed Plan should aspire to much greater growth in the region and fails to allocate new housing land which conflicts with the policy requirements of Scottish Planning Policy and the Government's specific objective to provide a 'generous' supply of housing land, and the need to maintain a 5 year effective supply of housing land at all times. Both National Planning Framework for Scotland 2 and Scottish Planning Policy set out that the planning system should allocate a generous supply of land to meet identified housing requirements across all

tenures.

### **E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties**

The Strategic Development Planning Authority should identify additional land 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**

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. Considers that additional sites should be allocated to compensate against sites becoming non-effective and ensure that flexibility is retained moving forward. It is considered that there is reliance by the 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)**

The following main points are raised:

- Dismiss the asserted elements of flexibility in the Plan and seek to incorporate 'real' measures of flexibility.
- Scottish Planning Policy requires a 'generous' supply of appropriate and effective sites.
- The Plan claims that flexibility has been introduced through the following three ways, these claims are considered invalid for the following reasons:

#### i. Selection of demographic scenario (paragraph 4.65)

The assessment of the strategic housing requirement from the Housing Need and Demand Assessment is a matter of judgement for the Strategic Development Planning Authority. However, once this is selected then Scottish Planning Policy is clear on the implications for the Proposed Plan - this housing requirement should be met in full supported by a development strategy which can deliver the effective land supply to meet this level of sustainable growth. The Proposed Plan provides no element of flexibility other than the choice of the growth estimate.

#### ii. Overlap between assessed needs and household projections

Meeting the assessed backlog of housing need is one of the outcomes from the Housing Need and Demand Assessment process. This critical component of housing need and demand was not taken into account in previous Structure Plan methodologies to assess strategic housing requirements. Backlog of need is part of the new methodology to assess the strategic housing requirements. It is not an element of flexibility. The key concern for the strategic development strategy is the approach to be adopted to meet this backlog. This is not flexibility but a key element of the development strategy.

#### iii. Discounting windfall sites from supply

Scottish Government only wishes to include future sources of land supply which are identified such as allocated land and sites with planning permission. This helps ensure that an effective housing land supply is evident. Excluding this source of land supply does not increase flexibility.

- Considers further flexibility can be provided by ensuring that appropriate policy mechanisms are in place in the Local Development Plans to ensure that a 5 year effective land supply is available at all times.

#### **E42/6 Lynch Homes, E45/6 CALA Homes (West)**

Consider that there is a lack of flexibility in the Plan, resulting in no new land for private housing. Scottish Planning Policy obliges development plans to maintain a 5 year effective housing land supply at all times. This provides a generous land supply. This flexibility is needed in the Proposed Plan and this has not been addressed.

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

Raises the following main points:

- the Proposed Plan does not demonstrate that there is sufficient evidence in the proposed plan or its supporting papers to demonstrate that the plan identifies a generous supply of land to meet identified housing needs across all tenures, as sought by Scottish Planning Policy.
- Paragraph 4.67 of the Proposed Plan explains the different affordability assumptions that have been used for calculating housing needs in the market and affordable sectors. Nevertheless it is considered evidence exists in the Housing Need and Demand Assessment on which to base an overall housing requirement figure across all tenures, and that this should have been the starting point for the consideration of housing land supply issues in the plan.

#### **E52/13 Mactaggart and Mickel (Homes) Ltd.**

- the private sector requirement remains too cautious and does not follow government guidance in seeking to provide a generous housing land supply.
- acknowledges 10% surplus forecast, however, proposes a generous surplus would be 25-33% at the outset.

#### **E53/1 SRG Estates**

The following main points are raised:

- disputes that flexibility is built into the Proposed Plan in paragraph 4.71. Considers that additional land must be allocated to encourage development in a depressed market.
- the reference to 'generous allocations of land for future housing' is challenged given the wider economic context i.e. it is considered that Community Growth Areas are unlikely to be effective in the short term so supplementary alternative proposals/strategies should be identified at a strategic level in order to avoid resultant unmet demand.

#### **E55/4 Homes for Scotland**

The following main points are raised:

- does not agree fully with paragraph 4.71, while higher population projections than General Register Office for Scotland (now National Records of Scotland) are elements of flexibility, backlog need and discounting of 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 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.
- Document HFS2, supplied as a supporting document to their representation, sets out Local Authority requirements and supply – the close correspondence of figures questions if this represents 'generous' land supply. Reference is made to research by Turley Associates, provided as a Supporting Document to the representation HFS3, suggesting that 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, Page 15.)

**Modifications sought by those submitting representations:**

**E8 Taylor Wimpey UK Ltd**

No specific modifications sought.

**E9 Wallace Land, E10 CALA Homes/ Taylor Wimpey UK Ltd**

No specific modifications sought.

**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 17 Effectiveness and Additional Housing Land).

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

Taking account of difficulties in delivering the established housing land supply, revise Schedules 8 and 9 to include additional housing land releases. The plan should also be modified to introduce flexibility for future housing land allocations.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land).

### **E24 Banks Group**

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 within the new hierarchy of development within the Planning etc. (Scotland) Act 2006, to allow the provision of a wider range of opportunities. Local Development Plans should be given more flexibility to provide a generous housing land supply.

Windfall sites cannot be regarded as part of the planned housing requirement and can only be considered effective once planning applications are approved.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land).

### **E29/2 Ogilvie Homes Ltd**

Failure to allocate new housing land conflicts with the policy requirements of Scottish Planning Policy, and the Government's specific objective to provide a 'generous' supply of housing land, and the need to maintain a 5 year effective supply of housing at all times. Both National Planning Framework for Scotland 2 and Scottish Planning Policy set out that the planning system should allocate a generous supply of land to meet identified housing requirements across all tenures.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land).

### **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 then it would maintain flexibility in the land supply.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land and Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

### **E31 Caledonian Properties**

Additional sites should be identified to compensate for sites becoming non-effective such as Community Growth Areas, 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.

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

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

Seek the following modifications because it is misleading to suggest that these elements add flexibility to the Proposed Plan:

- delete last sentence in paragraph 4.65 "The demographic scenario is the first of several elements of flexibility built into the Housing Need and Demand Assessment."
- delete last two sentences in paragraph 4.69 "There is also evidence to suggest an overlap between assessed needs and household projections. This represents another element of flexibility in the Housing Need and



Demand Assessment.”

- 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 17 Effectiveness and Additional Housing Land).

#### **E42/6 Lynch Homes, E45/6 CALA Homes (West)**

Specific modifications sought relate to Issue 27 Strategy Support Measure 10 Housing and Local Flexibility.

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

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 17 Effectiveness and Additional Housing Land, Issue 22 All Tenure Housing Requirement and Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

#### **E52/13 Mactaggart and Mickel (Homes) Ltd.**

Seek the following modifications:

- 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 17 Effectiveness and Additional Housing Land and Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

### **E53/1 SRG Estates**

Specific modifications sought relate to Issue 17 Effectiveness and Additional Housing Land.

### **E55/4 Homes for Scotland**

Seeks the following modifications:

- delete paragraph 4.71 entirely. Renumber remaining paragraphs accordingly.
- 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 4.87 third sentence, delete all after ‘local authorities’ and replace with “...should identify generous supplies of housing land and should evaluate carefully the options for maximising the delivery of affordable housing as part of mixed and sustainable communities.”

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land and Issue 22 All Tenure Housing Requirement).

## **Summary of responses (including reasons) by planning authority:**

### **General**

- This Issue addresses the question of whether the Glasgow and the Clyde Valley Strategic Development Planning Authority has interpreted satisfactorily the requirement in Scottish Planning Policy (Supporting Document 1) for generosity in the land supply.
- Many of the housing issues are inter-related and other aspects of the response will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the various housing issues is detailed in the paper ‘Housing Land - A Strategic Overview’.
- The Housing Need and Demand Assessment, the tool used to calculate housing requirements, is a new methodology.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority and Housing Market Partnership have produced a Housing Need and Demand Assessment that has been declared ‘robust and credible’ in a letter from the Scottish Government’s Centre for Housing Market Analysis dated June 2011 (Supporting Document 2).
- The Scottish Government’s Housing Need and Demand Assessment Guidance, Page 7 (Supporting Document 3) 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.

- However, a number of methodological issues and gaps were identified in the guidance (detailed in the Housing Need and Demand Assessment, 2011, Paragraph 1.47, Page 17 and Technical Appendix 6, Section 2 (Supporting Document 4). Methodological solutions were agreed and developed by the eight Glasgow and Clyde Valley local authorities through their Housing Market Partnership to fill these gaps.
- The Housing Need and Demand Assessment, although looking to 2025, will be reviewed in five years (2016) alongside the Proposed Plan.
- To aid clarity, the process for establishing projected future housing requirements and housing land supply (summarised in Box 1 in Planning Advice Note 2/2010) (Supporting Document 5) needs to be transparent. Broadly, it comprises:
  - The Housing Need and Demand Assessment provides important underlying evidence for the Strategic Development Plan, Local Housing Strategies and Local Development Plans.
  - The Housing Need and Demand Assessment results, and issues arising, are to be assessed by Local Authorities in policy terms, and translated by them into Housing Supply Targets for all tenures, taking into account a range of factors.
- The spatial pattern of housing land supply requirement is then derived from the Housing Supply Targets in the form of a 'generous' land supply. This generosity offers flexibility in the system; for instance,
  - to resolve difficulties which may arise from sites not coming forward for development as anticipated or developments being delayed
  - to ensure a degree of choice in site availability and location
  - to cope with variability in demand and development so that the land supply should not constrain delivery of new homes...in particular so that it should not hinder the aspiration to raise the rate of new house building.
- Local Authorities must ensure at least a five year effective housing land supply at all times.
- Outcomes should be monitored, and the Housing Need and Demand Assessment, Local Housing Strategies and development plans should be reviewed and revised every 5 years.

The Authority's response considers two sub-issues, before addressing the specific modifications proposed:

- 1. Flexibility in the Housing Need and Demand Assessment Approach; and**
- 2. Generosity, before addressing the specific modifications proposed.**

## **Sub-issues**

### **1. Flexibility in the Housing Need and Demand Assessment Approach (Paragraph 4.71)**

The approach adopted by the Glasgow and the Clyde Valley Strategic Development Planning Authority, in preparing the Housing Need and Demand Assessment, favoured generosity in the assumptions used in three particular elements:

- *Population and household projections:* the Glasgow and the Clyde Valley Strategic Development Planning Authority prepared its own population and household projections using a 'tried-and-tested' approach (Issue 3 Economic and Demographic Framework). It was faced with the choice of either using the National Records of Scotland 2006-base projections, or preparing its own set of projections using the latest information (Housing Need and Demand Assessment Technical Appendix 6, Paragraph 5.1) (Supporting Document 6).
- An exercise has been undertaken which indicates that the projection adopted in the Proposed Plan is considerably more optimistic than the National Records of Scotland principal household projection (Housing Need and Demand Assessment, Chapter 3) (Supporting Document 7).
- The projection plans for 21,600 more households in the private sector to 2025 than that of the National Records of Scotland principal projection. This projection, in combination with three elements of flexibility (Proposed Plan, page 42, paragraph 4.71)
  - Optimistic household projections
  - Backlog need, over and above household projections
  - Discounting windfall locations

addresses the question by **E55/4 Homes for Scotland** which asked how much additional flexibility is built into the Housing Need and Demand Assessment Projections.

- The adoption of optimistic household projections is seen as reasonable in the context of an aspirational long-term plan to 2025 and 2035. The Proposed Plan, in line with legislation, takes a long term view. Short term market fluctuations are frequently integral to such a long term outlook.
- Similarly, the Housing Need and Demand Assessment recognised that in the short term, household growth would be less (Housing Need and Demand Assessment, Chapter 4, Page 91, paragraph 4.52) (Supporting Document 8). At the same time the Housing Need and Demand Assessment used assumptions on household growth, which reflected longer term conditions. If we had focussed on the short term outlook, then the household projections would have been considerably lower.
- *Backlog Need:* the Scottish Government's Housing Need and Demand Assessment Guidance (Supporting Document 9) introduced the requirement to consider backlog need in the private sector for the first time in the context of strategic planning for housing.

- It is a complex concept, with potential for significant variation between authorities depending on local policy and interpretation. The Housing Need and Demand Assessment records concern at the potential for double counting between the household projections and backlog need (Chapter 5, Pages. 105-106, paragraphs 5.17 5.18) (Supporting Document 10). This methodological problem of potential double counting is highlighted also in a recent paper reviewing the experience of preparing Housing Need and Demand Assessments in Scotland: “Wagging the Dog: Assessing Housing Need” by Newhaven Research for the Chartered Institute of Housing in Scotland, 2011; Pages 36-37 (Supporting Document 11).
- Notwithstanding, in accordance with Housing Need and Demand Assessment Guidance, the full backlog need figures were used in projections. The Proposed Plan recognises that the adoption of the full backlog figure provides significant flexibility, although it could not be accurately quantified due to the inconsistencies between the different methodologies required for the private and affordable tenures.
- *Windfall*: the Strategic Development Planning Authority recognises that windfall sites cannot be counted towards meeting the housing land requirement until planning permission for housing has been granted or they are under development (Planning Advice Note 2/2010, Paragraph 62) (Supporting Document 5); for that reason windfall sites are not included in the Housing Land Audit or the Urban Capacity Study.
- However, it seems reasonable for the Proposed Plan to recognise that some additional housing sites are likely to come forward in this manner during the life of the Plan, offering some additional flexibility. The recognition of windfall sites as flexibility is particularly important in the Glasgow and Clyde Valley Conurbation where there is an established brownfield regeneration strategy. There is a constant supply of new sites emerging from regeneration processes, planned and unplanned, within the urban fabric and it is important to be mindful of this emerging supply.
- Research by Turley Associates for the Scottish Government, ‘The Effectiveness of Housing Land Audits in Monitoring Housing Land Supply in Scotland’, 2008, Page 15 (Supporting Document 12), suggested that new windfall sites more than made up for the “lack of delivery” from the existing supply within the five-year period studied, and even more so for the seven years over which the city-region authorities programme their supply. Due to their very nature windfall sites are unknown and it is not appropriate to attempt to quantify this sort of additional supply.

## 2. **Generosity**

- Scottish Planning Policy (Supporting Document 1) states that “The delivery of housing through the development plan to support the creation of sustainable mixed communities depends on a generous supply of appropriate and effective sites being made available to meet need and demand, and on the timely release of allocated sites” (Paragraph 70). In turn “Allocating a generous supply of land for housing in the development plan will give the flexibility necessary for the continued delivery of new housing even if unpredictable changes to the effective land supply occur

during the life of the plan” (Paragraph 71). “A supply of effective land for at least 5 years should be maintained at all times to ensure a continuing generous supply of land for house building (Paragraph 75).

- For the Proposed Plan period of 2009-25, for the private sector, there is considered to be a net requirement for 97,000 new housing completions. The land supply is estimated to offer 108,000 completions, leaving a surplus of 11,000 (Schedule 6 on page 43). This surplus is equivalent to around 11% on top of the requirement.
- Scottish Planning Policy does not provide a definition of ‘generosity’; it is left to the Strategic Development Planning Authority to take a balanced judgement on the matter. That judgement clearly must be taken in the context of wider policy considerations and other factors impinging on housing market circumstances.
- Given the aforementioned three factors of flexibility, the Strategic Development Planning Authority takes the view that it has provided a generous supply. The Authority does not accept that simply allocating more land will increase delivery of new homes (ref Issue 17 Effectiveness and Additional Land), in the absence of other fiscal measures to make debt financing more readily available and mortgages more affordable. The Authority has taken the view that a generosity allowance of 25% - 33% at the outset, as suggested by Mactaggart and Mickel (Homes) Limited (Representation E52-13), is unnecessary and has potentially significant negative consequences for the Spatial Vision and Spatial Development Strategy.
- Large additional land releases, as implied by many of the representations, would be also contrary to the Scottish Government’s National Planning Framework for Scotland 2, paragraphs 81 and 91) (Supporting Document 13) and its ‘direction of travel’ towards a low-carbon sustainable future.
- However, the Strategic Development Planning Authority is aware of economic circumstances which currently prevail with market volatility and uncertainty, and in recognition of these, the Proposed Plan has included Strategy Support Measure 10 to provide Local Authorities with the flexibility to respond to local circumstances.

#### **Response to specific modifications sought**

**E8 Taylor Wimpey UK Ltd, E9 Wallace Land, E10 CALA Homes/ Taylor Wimpey UK Ltd; E14/1 Land Synergy, E15/1 Bellisle Developments Ltd, E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson, E34 James Barr Ltd, E35 Messrs Keith & John Lawrence, E29/2 Ogilvie Homes Ltd, E30 NHS Greater Glasgow and Clyde, E53/1 SRG Estates**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications. These representations are non-specific in their request for allocation of additional land to ensure a generous housing land supply. Based on the foregoing arguments, the Strategic Development Planning Authority is satisfied that it has provided a generous supply, at around 11% of land supply, underpinned by significant flexibility in arriving at this figure. In reality, it would anticipate a ‘generosity’ level significantly in excess of the 11% figure.

**E24 Banks Group, E31 Caledonian Properties**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the grounds that it has already allocated a generous land supply.

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

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.65 on the grounds that the demographic scenario adopted does in fact comprise real flexibility, as detailed in Sub-issue 1 above.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.69 on the grounds that the methodology for calculating backlog need includes some element of overlap/double counting with the household projections, and the decision to use the full backlog figure errs on the side of flexibility, as detailed in Sub-issue 1 above.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to Paragraph 4.71 on the grounds that the three elements of flexibility specified offer significant flexibility, as discussed in Sub-issue 1 above. Furthermore the Proposed Plan already incorporates a generous land supply, as discussed in Sub-issue 2 above. There is therefore no requirement to re-calculate figures and provide an alternative Schedule 6.

**E42/6 Lynch Homes, E45/6 CALA Homes (West)**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the grounds that it has already allocated a generous land supply.

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

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the grounds that it has already allocated a generous land supply.

**E52/13 Mactaggart and Mickel (Homes) Ltd.**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects these proposed modifications on the grounds that it has already allocated a generous land supply, consistent with Scottish Planning Policy, as discussed in Sub-issue 2 above.

**E55/4 Homes for Scotland**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.71 on the grounds that the three elements of flexibility specified do offer flexibility, as discussed in Sub-issue 1 above.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.75 on the grounds that it has already allocated a generous land supply, as detailed in Sub-issue 2 above.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.87 on the grounds that it has already allocated a generous supply of housing land, as detailed in Sub-issue 2 above.

**Reporter's conclusions:**

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**Reporter's recommendations:**

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