

Issue No: 27

Issue: Strategy Support Measure 10: Housing and local flexibility

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1. Scottish Planning Policy, The Scottish Government, 2010, sections 35, 37, 38 and 40 (Extract)
2. Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, June 2011, Background Report 4 'Vacant and Derelict Land, 2010' (See Background Reports hard copy folder)
3. Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, June 2011, Background Report 13 'Urban Capacity Study 2009' (See Background Reports hard copy folder)
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Issue 27	Strategy Support Measure 10: Housing and local flexibility	
Development plan reference:	Spatial Development Strategy Spatial Framework 3 Sustainable Communities (page 49)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E5/4 Mr Michael and Mr Roger Jones E8 Taylor Wimpey UK Ltd E11/3 Ashfield Land E14/3 Land Synergy E15/3 Bellisle Developments Ltd E30 NHS Greater Glasgow and Clyde E31 Caledonian Properties E42/2, E42/6 Lynch Homes E45/6 CALA Homes (West) E46/5 Susan Barnes (Landowner) E49/5 Jackton & Thorntonhall Community Council E52/15 Mactaggart and Mickel (Homes) Ltd. E55/4 Homes for Scotland</p>		
Provision of the development plan to which the issue relates:	Spatial Framework 3 Sustainable Communities (page 49) Local Authority Flexibility and Strategy Support Measure 10 - Housing development and local flexibility	
Planning authority's summary of the representation(s):		
<p>Two diametrically opposed lines of modification are sought</p> <ol style="list-style-type: none"> 1) amend the text to increase the levels of overall flexibility accorded to Local authorities to increase the housing land supply, including the identification of triggers for the future release of effective sites when a five-year effective supply is not being maintained, or, 2) amend the text to remove the flexibility accorded to Local Authorities. <p><u>1) Increase Flexibility</u></p> <p>E5/4 Mr Michael and Mr Roger Jones Local Authorities should have flexibility over suitable greenfield opportunities within or attached to disadvantaged communities.</p> <p>E8 Taylor Wimpey UK Ltd, E11/3 Ashfield Land, E14/3 Land Synergy, E15/3 Bellisle Developments Ltd Remove the strategic priority focus on brownfield land as the source of new housing land allocations with greenfield sites being considered suitable where they accord with the sustainability principles of the plan.</p> <p>E8 Taylor Wimpey UK Ltd Remove the stipulation in Strategy Support Measure 10 that housing development proposals must meet all the provisions of the Measure</p>		

E8 Taylor Wimpey UK Ltd, E52/15 Mactaggart and Mickel (Homes) Ltd.

Meet all the provisions of the sustainable location assessment (Diagram 4, page 6) when it is used by Local Development Planning and Management Authorities

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties, E42/2 Lynch Homes

To support flexibility, the Strategic Development Plan should include the identification of triggers for the future release of effective sites when a five-year effective supply is not being maintained.

E31 Caledonian Properties

General request to allocate more land for housing development to meet Plan's requirements.

E46/5 Susan Barnes (Landowner)

Introduce new text into paragraph 4.89 and Strategy Support Measure Plan to allow for local scale provision, i.e. fewer than 50 units, as a economic reinforcement of local centres.

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

Amendments which put the focus on Local Development Plans to ensure five year effective land supplies and Development Management mechanisms to support that focus.

E55/4 Homes for Scotland

Remove paragraph 4.89 and Strategy Support Measure 10 and replace with general text emphasising generous land supplies to meet varying market conditions and ensure five year supplies are maintained through monitoring by the Local Development Planning Authority.

2) Remove Flexibility

E49/5 Jackton & Thorntonhall Community Council

Delete paragraph 4.89 and Strategy Support Measure 10 and delete provisions for flexibility to lie with the Local Development Plan and Management Authorities.

Modifications sought by those submitting representations:

E5/4 Mr Michael and Mr Roger Jones

Section 4 paragraph 4.89 at the end of paragraph add 'The exception to this preference would be within or adjacent disadvantaged peripheral housing estate communities where local authorities should assess greenfield sites on their merits to contribute to sustainable development including increased transport provision or local services to allow reconnection opportunities.'

E8 Taylor Wimpey UK Ltd

Delete last sentence in paragraph 4.89, as there is no need to expect releases to be primarily on brownfield land as brownfield land is unconstrained by supply and demand calculations and some authorities like East Dunbartonshire and East Renfrewshire, have limited opportunities for brownfield releases.

Delete the word 'only' from the last line of 2nd paragraph of Strategic Support Policy 10, and 'in full' 4th word of 2nd bullet point.

E11/3 Ashfield Land, E14/3 Land Synergy, E15/3 Bellisle Developments Ltd

Last sentence of paragraph 4.89 be reworded 'These additional releases would be expected to be primarily on brownfield sites where possible, however with a view to maintaining a range and choice of housing sites, greenfield sites should also be considered where these would be in accordance with the sustainability principles of the SDP.'

E31 Caledonian Properties

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

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties, E42/2 Lynch Homes

Include the identification of triggers for the future release of effective sites when a 5 year effective supply is not being maintained.

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

Re-word paragraph 4.87 line 6 'have produced levels of housing need and demand'.

Delete paragraph 4.88.

Paragraph 4.89 amend first sentence

'Using the 2010 Housing Land Audit, the SDP has identified that the supply of land within the city region needed to meet projected housing need and demand'.

Paragraph 4.89 delete last sentence and substitute

'In addition, the land releases proposed between 2020 and 2025 can be brought forward through the development management process (without the need for an alteration to the Local Development Plan) if there is a shortfall in the effective land supply. It is necessary for all Local Development Plans to incorporate a policy mechanism to enable a 5 year effective housing land supply to be maintained at all times. This policy mechanism should allow the development process to approve greenfield as a brownfield sites for housing.

Strategy Support Measure 10 amend first sentence

'Local Authorities should continue to audit their housing land supply in light of the prevailing housing market conditions, with a view to augmenting, where appropriate, the effective supply in the short term to 2020'.

Strategy Support Measure 10 amend second sentence

This action is particularly relevant where a private sector contribution could address affordable housing needs.

Strategy Support Measure 10 add additional sentence

'Local development Plans should include a policy mechanism to ensure that a five year housing land supply is maintained at all times and this can release land for sustainable development including greenfield land.'

E46/5 Susan Barnes (Landowner)

Paragraph 4.89 amend last sentence

Add '...or limited growth of local centres...' after 'brownfield sites'.

Strategic Support Measure 10 add new sentence.

'are of less than 50 units in scale and have been assessed against other potential sites within or adjacent to the relevant local centre.'

E49/5 Jackton & Thorntonhall Community Council

Delete sub-section 4.89 and Strategy Support Measure 10 entirely.

E52/15 Mactaggart and Mickel (Homes) Ltd.

Strategy Support Measure 10 reword bullet point two

"Have been assessed against the criteria listed in the sustainable location assessment (Diagram 4)".

E55/4 Homes for Scotland

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."

Delete paragraph 4.89 and Strategic Support Measure 10. Replace with new text: "A generous supply of land should ensure that changes in market conditions can be accommodated. LDPs (Local Development Plans) should ensure through annual monitoring that a minimum 5-year supply of effective housing land is available at all times. If a shortfall emerges, Councils may bring forward additional land using the criteria in Diagram 4 to ensure that needs are met in the most sustainable way".

Summary of responses (including reasons) by planning authority:

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 Housing Land - A Strategic Overview topic paper.

E5/4 Mr Michael and Mr Roger Jones

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as the use of exceptions in this instance potentially undermines the sustainability principles of the Strategic Development Plan by introducing local considerations inappropriate to at the strategic scale. These considerations are more appropriately dealt with at the local development plan level.

E8 Taylor Wimpey UK Ltd, E11/3 Ashfield Land, E14/3 Land Synergy, E15/3 Bellisle Developments Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification for the following reasons:

- the Proposed Plan reflects the Scottish Government's Scottish Planning Policy's (2010) (Sections 35, 37, 38, Page 7 and Section 40, Page 8) (Supporting Document 1) promotion of regeneration and re-use of previously development land, as the focus for sustainable development, living within environmental limits and improving the quality of the built environment.
- brownfield land remains a significant resource in the city-region providing a

range of strategic spatial options for sustainable development, Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, June 2011, Background Reports 4 'Vacant and Derelict Land 2010' and 13 'Urban Capacity Study 2009' (Supporting Documents 2 and 3).

- Brownfield land's prioritisation for development is wholly consistent with the focus on meeting the Scottish Government's ambition of low-carbon, climate change mitigation and sustainable development.
- paragraph 4.89 and Strategy Support Measure 10 both emphasise that brownfield land options remain the primary strategic focus, but as reflected in the wording and intent of the Measure, greenfield options may be appropriate if the brownfield option is undeliverable in the short term.
- it would be inconsistent with the basic philosophy of the Proposed Plan other than to place the strategic focus on the brownfield land resource.

E8 Taylor Wimpey UK Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications for the following reasons as Strategy Support Measure 10 :

- provides clarity to local planning authorities regarding local flexibility and scale, on how to exercise that flexibility in their local development plans and development management decisions when meeting the needs of the Spatial Development Strategy.
- emphasises that flexibility be applied framed by the principles of the Proposed Plan, its sustainable locations' focus, infrastructural investment and emerging Local Development Plan frameworks.
- is not a 'carte blanche' to development, but is carefully designed to support the direction and focus of the Spatial Development Strategy and the proposed modification would weaken that strategic focus.

E8 Taylor Wimpey UK Ltd, E52/15 Mactaggart and Mickel (Homes) Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification for the following reasons:

- the sustainable locations assessment tool (Diagram 4, page 6) provides the development management authority with a framework to assess the sustainability of a proposed development location.
- the sustainable locations assessment tool is designed to reflect the basic integrated strategic thinking of the Proposed Plan and therefore needs to be applied in its entirety. It is not a 'pick-and-mix' tool where its use can support any particular development agenda, as that agenda may conflict with other competing strategic components.

E31 Caledonian Properties

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification for the following reasons:

- the Proposed Plan provides a generous land supply for housing development, as well as according local flexibility, where appropriate, to

secure local scale developments over and above the existing supply.

- allocating even more land in non-sustainable locations, in a period where demand is significantly depressed by economic conditions, lack of mortgage finance and consumer confidence, would not lead to enhanced levels of development.
- the Proposed Plan, through the Community Growth Areas, thirteen in number and with capacity for over 20,000 units already provides a significant potential for sustainable greenfield development in addition to its brownfield focus.
- allocating even more land in non-sustainable locations over and above the current generous supply would add to land banks in non-sustainable locations and erode the strategic focus on sustainable development. It would be in direct contradiction of the Proposed Plan's drive to meet the Scottish Government's vision of a sustainable and low-carbon future.

E46/5 Susan Barnes (Landowner)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it is considered a local issue which will be addressed within forthcoming local development plans and does not require a Strategic Development Plan response.

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties, E42/2 Lynch Homes

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers that Strategy Support Measure 10 provides the appropriate strategic 'trigger' for local authorities in relation the continual auditing of their housing land supply and thereby supports flexibility in the housing land supply.

E42/6 Lynch Homes, E45/6 CALA Homes (West), E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification:

- local development planning authorities are directed by Scottish Planning Policy (section 72, page 15) to maintain a five-year housing land supply so it is unnecessary for the Proposed Plan therefore to repeat that stipulation.
- management of the local development plan process and its need for alterations is an issue for the relevant local authority.
- the Proposed Plan already provides an overall strategic context of a generous land supply to address market sector demand, and in respect of the 'affordable' sector, provides land supply flexibility to the local authority, as appropriate, whilst additional local housing and planning work is undertaken to confirm the needs of that sector.
- Strategy Support Measure 10 is the Proposed Plan's framework for that local flexibility, ensuring its need to reflect the principles of the Strategic Development Plan and meet the requirement to locate new development in sustainable locations.

Category 2

E49/5 Jackton & Thorntonhall Community Council

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

- Paragraph 4.87 (page 49) of the Proposed Plan highlights, as an integral component of the Housing Needs and Demand Assessment (Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, June 2011, Background Report 12 'Housing Need and Demand Assessment') (Supporting Document 4 - deemed 'robust and credible' by the Scottish Government's Centre for Housing Market Analysis), that a range of assumptions are inherent in the methodology which are critically sensitive, and that even small variations in these assumptions can lead to radically different results.
- Local variations in the outcomes of the Housing Needs and Demand Assessment suggest that more detailed work will be necessary in Local Housing Strategies and Development Plans in order to confirm final outcomes.
- New-build housing, as a response, is not an automatic outcome and in terms of a sustainable approach, capitalising on the current building stock is the first step.

Paragraph 4.89 and Strategy Support Measure 10 reflect therefore a need for flexibility in responding to this issue through release of more land to address local short-term issues.

Reporter's conclusions:

Reporter's recommendations: