

*improving living in scotland*



**Response to Further Information Request 1  
Proposed Inverclyde Local Development Plan Examination  
LDP-280-2**

**February 2019**

## **About Homes for Scotland**

Homes for Scotland is the voice of the home building industry.

With a membership of some 200 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people want to live.

Visit [www.homesforscotland.com](http://www.homesforscotland.com) for further information and follow us on twitter @H\_F\_S

## **Process**

Homes for Scotland represents members on a wide range of issues affecting their ability to deliver much needed homes.

Our views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from member companies.

This response has been discussed and agreed by the Homes for Scotland Strathclyde Home Builders Committee

## Information Requested

Homes for Scotland welcomes the opportunity to provide comment on Inverclyde Council's and Clydeplan Strategic Development Planning Authority's (SDPA) response to Further Information Request (FIR) 01.

As part of this commentary, Homes for Scotland has prepared a Housing Land Supply Statement which, in accordance with the approved Clydeplan Strategic Development Plan (SDP) Policy 8 Housing Land Requirement, provides this Examination with the up to date housing land supply data as set out in the Council's finalised Housing Land Audit 2018 (HFS001).

The Housing Land Supply Statement explains in detail the statutory policy requirements that underpin the approved SDP and how those are to be addressed by the Council in the Inverclyde Proposed Local Development Plan (LDP).

Reference is made to the Core Documents submitted by the Council to this Examination where appropriate. Homes for Scotland has provided the following additional documents to assist the Reporter in the determination of this FIR:

- HFS01 Finalised Housing Land Audit 2018
- HFS02 PAN 2/2010 Affordable Housing and Housing Land Audits
- HFS03 Housing Land Audit 2018 – Homes for Scotland Disputes
- HFS04 Homes for Scotland Housing Land Audit 2018 – 2018 to 2029
- HFS05 Technical Report 07 *Strategic Housing Estimates*
- HFS06 Background Report 8 *Beyond the Housing Need and Demand Assessment*
- HFS07 Inverclyde Draft Housing Supply Target Template
- HFS08 Background Report 9 *Urban Capacity Study 2013*
- HFS09 Inverclyde Strategic Housing Investment Plan 2019 – 2024

Homes for Scotland notes the response from the Council and the SDPA to each of the Reporter's questions set out in the Further Information Request, offering commentary as follows.

Inverclyde Council Response
<p><b>FIR – Point 3</b></p> <p>Homes for Scotland agrees with the Reporter that the Council has changed position from the Main Issues Report, to the Proposed LDP and now what is stated in the Schedule 4 for Issue 5 <i>Housing Land Supply, Housing Supply Targets and Housing Land Requirement</i>.</p> <p>Contrary to the Council's assertion before this Examination, there are not ... <i>two commonly recognised ways of updating figures to a new base date: compound and annualised</i>. Homes for Scotland disagrees with the Council that ... <i>there is currently no clear guidance at a national level on which approach is preferred</i>.</p> <p>The Housing Land Supply Statement (paragraphs 3.1 to 3.11) identifies the clear guidance in the approved SDP as to how the housing land requirements are to be met.</p> <p>Therefore, the correct approach is as follows:</p>

<b>Housing Land Requirement</b> Source: Clydeplan SDP	
<b>Housing Completions</b> Source: Housing Land Audit	<i>minus</i>
<b>Programming of Established Land Supply</b> Source: Housing Land Audit	<i>minus</i>
<b>Surplus or Shortfall</b> Scale of Additional Allocations Required	<i>equals</i>

The SDP was approved with modifications by the Scottish Ministers, taking account of Scottish Planning Policy. The policy framework in the SDP requires the Council to adopt up to date housing land supply data to ensure that sufficient housing land is allocated which is effective, or capable of becoming so, such as to meet the housing land requirements identified in Schedules 8, 9 and 10.

Both Schedule 9 and 10 clearly identify that the private housing land supply at 2013 includes housing completions to date (footnote 1). Housing completions to date are to be included in assessing whether or not the housing land requirements are met.

The Council's two approaches set out in the Housing Land Technical Report (CD0013, Table 6) are both contrary to SDP Policy 8 *Housing Land Requirement*.

For the purposes of this Examination, the methodology set out in the Housing Land Supply Statement (paragraphs 3.1 to 3.90) should be adopted to assess whether or not the housing land requirements are met.

#### **FIR – Point 6**

Homes for Scotland notes the Council commentary. However, the assertion that completions should be compared against the housing supply target and not the housing land requirement is contrary to the SDP. As set out above, the statutory policy requirements of the approved SDP require the Proposed LDP to meet the housing land requirements set out in Schedules 8, 9 and 10 and not the housing supply targets. This was also the approach taken by Reporters in the recent Dundee LDP examination (Decision Pgs. 69, 70 & 73).

The housing land requirements are set out in the Housing Land Supply Statement (paragraphs 2.6 to 2.21). The Council is required to allocate a range of sites which are effective or expected to become effective in both plan periods, 2012 to 2024 and 2024 to 2029 ensure delivery of all housing land requirements.

This appears to be the position adopted by the Council for the Main Issues Report, which was subsequently altered for the Proposed LDP and altered again in the Schedule 4 for Issue 5.

#### **FIR – Points 7 and 8**

Homes for Scotland agrees with the Reporter's conclusions. The Reporter should note that the finalised Housing Land Audit 2018 (HFS01) has been published by the Council. This up to date housing land data is fully assessed in the Housing Land Supply Statement.

The Reporter will note that the Housing Land Audit 2017 did not include programming of the new allocations set out in the Proposed LDP. In examining whether the Proposed LDP meets the housing land requirements, consideration needs to be given to the evidence

presented in the Housing Land Audit 2018.

The Reporter will note that 40% of the private sector housing land supply is disputed. This significant disparity requires to be fully addressed as part of this Examination. It is clear that the Council is not critically assessing its housing land supply in accordance with national policy and guidance.

Homes for Scotland considers that the outcome of the private sector by Kilmacolm and Quarriers Village LASA assessment is as follows:

	2012 - 2024	2024 - 2029	2012 - 2029	
<b>Housing Land Requirement</b> Source: Proposed LDP	140	60	200	
<b>Housing Completions</b> Source: Housing Land Audit	3	0	3	<i>minus</i>
<b>Programming of Established Land Supply</b> Source: Housing Land Audit	65	0	65	<i>minus</i>
<b>Surplus or Shortfall</b> Scale of Additional Allocations Required	<b>-72</b>	<b>-60</b>	<b>-132</b>	<i>equals</i>

There is a shortfall of 72 private homes over the period from 2012 to 2024 and 60 private sector homes over the period from 2024 to 2029. Given the 3 completions in the area to date it would not be appropriate to assume any windfall completions in this part of Inverclyde. In accordance with approved SDP Policy 8 and informed by up to date housing land supply data, the Proposed LDP does not allocate sufficient housing land which is effective, or capable of becoming so, to assist meet the private sector housing land requirement for the Renfrewshire HSMA as set out in Schedule 9.

### FIR – Point 9 and 10

Homes for Scotland notes the Council's response. The Council point out that the HLR for the Renfrewshire sub housing market area within Inverclyde can be derived from the schedules set out in Clydeplan. Noting the Council's purported repopulation agenda, we do not follow how its latest approach, of seeking to argue that the identified housing land requirement for Inverclyde should be met in an adjoining authority, fits with this ambition. This is particularly so given the shortage of supply across the Local Authority we demonstrate in our Housing Land Supply Statement.

In terms of Policy 8, the Council can ensure that the housing land requirements set out in Schedules 8 and 10 are met as follows:

- all tenure by local authority area; and
- private sector by local authority area.

Based on Housing Land Audit 2018, Homes for Scotland considers that the outcome of the of the all tenure by Inverclyde local authority area assessment is as follows:

	2012 - 2024	2024 - 2029	2012 - 2029	
<b>Housing Land Requirement</b> Source: Clydeplan SDP	3,630	1,440	5,070	
<b>Housing Completions (2012 to 2018)</b> Source: Housing Land Audit	890	0	890	<i>minus</i>
<b>Windfall Allowance (2021 to 2029)</b> Source: Housing Land Audit	90	150	240	<i>minus</i>

<b>Programming of Established Land Supply</b> Source: Housing Land Audit	1,870	746	2,616	<i>minus</i>
<b>Surplus or Shortfall</b> Scale of Additional Allocations Required	<b>-780</b>	<b>-544</b>	<b>-1,324</b>	<i>equals</i>

There is a shortfall of 780 all tenure homes over the period from 2012 to 2024 and 544 all tenure homes over the period from 2024 to 2029. In accordance with approved SDP Policy 8 and informed by up to date housing land supply data, the Proposed LDP does not allocate sufficient housing land which is effective, or capable of becoming so, to meet the all tenure housing land requirement for the Inverclyde local authority area as set out in Schedule 8.

It should be noted that the programming set out in the Housing Land Supply Statement is higher than the representation of Homes for Scotland's position set out in the finalised 2018 Audit. Homes for Scotland suggested reduced programming for some sites, but this has been interpreted as disputing all programming for these sites in the 2018 Audit. This is not accurate. Our programming includes sites such as Spango Valley and Inverkip Power Station which have been in the Audits for a significant number of years where serious deliverability issues remain. As such it represents an optimistic scenario assuming a significant increase in completions on recent years despite limited proposed changes to the land supply in the proposed LDP.

Based on Housing Land Audit 2018, the outcome of the private sector by Inverclyde local authority area assessment is as follows:

	2012 - 2024	2024 - 2029	2012 - 2029	
<b>Housing Land Requirement</b> Source: Clydeplan SDP	2,360	980	3,340	
<b>Housing Completions</b> Source: Housing Land Audit	542	0	542	<i>minus</i>
<b>Programming of Established Land Supply</b> Source: Housing Land Audit	788	637	1,425	<i>minus</i>
<b>Surplus or Shortfall</b> Scale of Additional Allocations Required	<b>-1,030</b>	<b>-343</b>	<b>-1,373</b>	<i>equals</i>

There is a shortfall of 1,030 private sector homes over the period from 2012 to 2024 and 343 private sector homes over the period from 2024 to 2029. In accordance with approved SDP Policy 8 and informed by up to date housing land supply data, the Proposed LDP does not allocate sufficient housing land which is effective, or capable of becoming so, to meet the private sector housing land requirement for the Inverclyde local authority area as set out in Schedule 10.

In accord with the Reporter's conclusions, agreed by Clydeplan SDPA and approved by the Scottish Ministers, these identified housing land shortfalls can be addressed fully by allocating further effective housing land in the Kilmacolm and Quarriers Village local authority sub area.

#### **FIR – Point 11 and 12**

Homes for Scotland agrees with the Reporter that Schedule 8 as well as Schedule 10 are best addressed through this Examination.

If the Reporter agrees that there remains a significant housing land shortfall in the all

tenure or private sector housing land supply by local authority area as demonstrated in the Housing Land Supply Statement (paragraphs 4.4 to 4.28), this can be addressed across the local authority.

#### **FIR – Points 13 and 14**

Homes for Scotland notes the Council's comment. This matter is addressed above.

#### **FIR – Points 15, 16 and 17**

Homes for Scotland notes the Council's comment. In accord with SDP Policy 8, the latest housing land audit for Inverclyde is the Housing Land Audit 2018 (HFS01). The Housing Land Supply Statement assesses whether or not the housing land requirements are met based on the Housing Land Audit 2018. This is consistent with para. 6.66 of the SDP which states that LDPs should be informed by up to date housing land supply data.

#### **FIR – Point 18 and 19**

Homes for Scotland notes the Council's comment. This matter is addressed above.

#### **FIR – Point 19**

Homes for Scotland notes the Council's comment. The Council has not carried forward the housing land requirements from the approved SDP. Nor has the addressed whether those housing land requirements as required by the approved SDP.

#### **FIR – Point 20**

Homes for Scotland notes the Council's comment. It is clear in the SDP (Policy 8) that the LDPs should make provisions

*“for the all tenure Housing Land Requirement by Local Authority set out in Schedule 8, for the Private Housing Land Requirement by Housing Sub-Market Area set out in Schedule 9 **and** for the Private Housing Land Requirement by Local Authority set out in Schedule 10;”* (SDP, p. 54, our emphasis).

There is a requirement to plan to meet all three in order to provide a further layer of security to seek to ensure that shortfalls do not arise. As we have demonstrated above there is a very substantial shortfall in private land supply across Inverclyde. This is required to be addressed in the proposed LDP. As such additional effective sites will need to be allocated.

Homes for Scotland notes the Council's commentary regarding the Appeal. We would respectfully suggest that the allocation of sites and wider spatial strategy is a matter for the LDP examination.

#### **Clydeplan SDPA Response**

#### **FIR – General Observations**

Homes for Scotland notes the Clydeplan SDPA's General Observations and offer no

comment.

**Date: 15<sup>th</sup> February 2019**