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**Response to Further Information Request 2
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 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 response to Further Information Request (FIR) 02.

As part of this commentary, Homes for Scotland has prepared a Housing Land Supply Statement which, in accord with 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 addresses each of the Reporter's questions set out in the Further Information Request, offering commentary on response received from the Council.

FIR – Point 1
Homes for Scotland agrees that the Proposed LDP requires to be prepared to be consistent with the approved SDP. The Housing Land Supply Statement (paragraphs 2.1 to 2.21) identifies the housing land requirements that the Proposed LDP is required to meet.
FIR – Point 2
Homes for Scotland agrees that the Proposed LDP does not demonstrate that any of the housing land requirements will be met. The Housing Land Supply Statement (paragraphs 3.1 to 3.90) identifies the methodology to adopt to determine whether the housing land requirements set out in the approved SDP will be met.
FIR – Point 3
Homes for Scotland notes that Scottish Planning Policy (CD035) identifies that the housing

land requirement can be met from the following sources:

- sites from the established supply which are effective or expected to become effective in the plan period;
- sites with planning permission;
- proposed new land allocations; and
- proportion of windfall development in some cases.

Scottish Planning Policy expects the contribution to the housing land requirement from windfall sites must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends. In urban areas this should be informed by an urban capacity study.

The Reporter will note that there is no urban capacity study as part of the Core Documents before this Examination.

However, Background Report 9 Urban Capacity Study 2013 (HFS08) informed the preparation of the approved SDP. The base date of this urban capacity study is 31st March 2013.

FIR – Points 4 and 5

Homes for Scotland notes this statement and agrees that the Housing Land Technical Report (CD013) does not present any evidence for a contribution from windfall sites and states:

The expectation is that some of the land currently identified for private sector housing in the post-2024 period, of which there is a surplus, will in fact be developed for affordable housing, as will 'windfall' sites.

The Schedule 4 for Issue 5 *Housing Land Supply, Housing Supply Targets and Housing Land Requirement* is also silent on the expected contribution from windfall sites.

Homes for Scotland agrees with the Reporter that Background Report 9 Urban Capacity Study 2013 (HFS08) informed the preparation of the approved SDP. The base date of this evidence is 31st March 2013 and is the only urban capacity study available.

FIR – Points 6 and 7

Homes for Scotland notes the Reporter's request.

SPP defines windfall sites as *...sites which become available for development unexpectedly during the life of the development plan and so are not identified individually in the plan.*

The Housing Land Supply Statement (paragraphs 3.75 to 3.90) identifies that, based on the evidence presented in Background Report 9 *Urban Capacity Study 2013* (HFS08) and past housing completions, the following contributions from windfall sites may be expected from 2021 to 2029:

- a private windfall allowance **0** homes per annum is appropriate; and
- an affordable windfall allowance of **30** homes per annum would be appropriate.

The reason for this is that:

- there has been no private sector windfall completions from the established housing land supply set out in the Housing Land Audit 2013; and
- only one site identified in the SHIP (HFS09) does not form part of the Housing Land Audit 2018 programming – Strone Farm, Greenock which is expected to deliver 16 affordable homes in 2019/20. It is also noted that the Council has secured funding for 45 affordable homes in 2021/22 and another 45 affordable homes in 22/23. Over the 4 year period, there are 106 affordable homes that are not accounted for in the Housing Land Audit 2018.

An affordable windfall allowance of a maximum of 30 homes per annum would be appropriate from 31st March 2021 onwards, taking account of the committed funding in the SHIP where investment in sites is confirmed for the first 3 years and therefore the period beyond is unknown.

The Reporter will note that the affordable windfall allowance would apply to the all tenure by Inverclyde local authority area housing land requirement only.

No private sector windfall allowance would apply to the Discrete Market Area Inverclyde Housing Sub Market Area (HSMA) and the Renfrewshire HSMA (Kilmacolm and Quarriers Village local authority sub area) housing land requirements.

However, Homes for Scotland notes that the Council has provided alternative information to the Reporter.

The Council has included housing completions from sites which it states were not allocated in the development plan when they were granted planning permission as set out in Table 1 *Inverclyde HMA private completions on windfall sites 2008-2018* and Table 2 *Inverclyde HMA affordable completions on windfall sites 2008-2018*.

The evidence submitted by the Council fails to include important relevant information on the site put forward. The Council has included many sites that were identified as allocations in the superseded Inverclyde Local Plan (CD032).

The Local Plan confirms that it ...*incorporates modifications to the First Review: Final Draft Plan (2002), approved by the Council on 24th February 2005 arising from the Local Plan Inquiry held in April/May 2004, and subsequent decisions of the Council on 6th September 2005.*

The housing land supply evidence to inform the Local Plan is set out in Schedule 7.1 *Housing Development Opportunities*. This Schedule confirms that the ...*source of the above figures is the Finalised 2004 Housing Land Supply, updated to reflect decisions of the Council prior to adoption.*

The following sites identified in Table 1 by the Council were included as allocations in the Local Plan and are therefore not windfall sites:

LP 2005 Reference	Town	ADDRESS
ho63	INVERKIP	KIP MARINA
ho64	INVERKIP	LANGHOUSE ROAD
ho17	GREENOCK	RATHO ST/EAST HAMILTON ST

ho7	GREENOCK	KINGSTON BASIN
ho7	GREENOCK	KINGSTON BASIN
ho7	PORT GLASGOW	KINGSTON BASIN
ho7	PORT GLASGOW	KINGSTON BASIN
ho7	PORT GLASGOW	KINGSTON BASIN
ho7	PORT GLASGOW	KINGSTON BASIN
ho7	PORT GLASGOW	KINGSTON BASIN
ho51	GREENOCK	LYLE ROAD
ho28	GREENOCK	OCTAVIA TERRACE

Of the remaining sites, the following would be considered windfall in terms of the definition set out in SPP:

HLA Reference	Town	ADDRESS	Completions
IC0393	GREENOCK	NEIL STREET	4
IC0391	GREENOCK	11A JAMAICA STREET	3
IC0406	GREENOCK	10 ELDON STREET	3
IC0414	GREENOCK	87 NEWTON STREET	2
IC0420	GOUROCK	CLOCH RD - RAMADA	35
IC0420A	GOUROCK	CLOCH RD - RAMADA	34
IC0434	PORT GLASGOW	BURNSIDE FARM	5
IC0425	GREENOCK	39 NEWTON ST	8
IC0432B	GREENOCK	EAST CRAWFORD STREET	3
IC0431A	PORT GLASGOW	MORAY ROAD	1
IC0447	GREENOCK	20 SHANKLAND ROAD	4
IC0452	GOUROCK	RESERVOIR ROAD	5
IC0439C	GREENOCK	CUMBERLAND ROAD PHASE 1	1
IC0455	GREENOCK	21 BRACHELSTON STREET	6
IC0439D	GREENOCK	CUMBERLAND ROAD PHASE 2	1

IC0456	GREENOCK	27 UNION STREET	4
IC0460	PORT GLASGOW	65 CHURCH STREET	4
IC0440B	GREENOCK	BANFF ROAD	1
IC0461	GREENOCK	LORNE COURT, 94 WEST BLACKHALL STREET	4

Over a 10 year period, there have been 128 private homes completed on windfall sites. This would amount to a windfall allowance of 13 private homes per annum over a 10 year period.

No private windfall allowance would apply to the Renfrewshire HSMA (Kilmacolm and Quarriers Village local authority sub area) housing land requirement.

The Reporter should note that IC0420 CLOCH RD – RAMADA was granted planning permission on Appeal. The scale of completions are the exception rather than the rule.

If completions from this site are excluded, then there have been only 59 private completions on windfall sites, all of which were within the Inverclyde HSMA. This equates to 6 private homes per annum. This contribution is negligible and as such no private windfall allowance should be assumed.

All the affordable sites identified by the Council in Table 2 would be considered windfall in terms of the definition set out in SPP:

HLA Reference	Town	ADDRESS	Completions
IC0407	PORT GLASGOW	HIGHHOLM AVENUE	28
IC0408	GREENOCK	112 WEST BLACKHALL STREET	9
IC0412	GREENOCK	EARNHILL ROAD	14
IC0428	GREENOCK	INVERKIP ROAD	20
IC0423	GREENOCK	CARWOOD ST	15
IC0432A	GREENOCK	EAST CRAWFORD STREET	5
IC0431	PORT GLASGOW	MORAY ROAD	31
IC0446	GOUROCK	17 ADELAIDE STREET	5
IC0439A	GREENOCK	CUMBERLAND ROAD PHASE 1	28
IC0441	GREENOCK	WESTMORLAND ROAD/STAFFORD ROAD	24
IC0439B	GREENOCK	CUMBERLAND ROAD PHASE 2	29
IC0439E	GREENOCK	CUMBERLAND ROAD PHASE 2	1

IC0440A	GREENOCK	BANFF ROAD	33
IC0440C	GREENOCK	BANFF ROAD	8
IC0398	GREENOCK	GARVALD STREET/BAWHIRLEY ROAD	45
IC0448	GREENOCK	EARNHILL ROAD EXTENSION	15

Over a 10 year period, there have been 310 affordable homes completed on windfall sites not allocated in a development plan. This would amount to a windfall allowance of 31 affordable homes per annum over a 10 year period. However, it is notable that the majority of these sites were granted planning permission more than 5 years after the adoption of the relevant plan.

The affordable windfall allowance would only apply to the Inverclyde local authority area all tenure housing land requirement from 2021 onwards.

Homes for Scotland would wish to reiterate that the urban capacity study that informs the approved SDP, and therefore this Proposed LDP, has a base date of 31st March 2013.

Therefore any historic completions data should be based on this date moving forward. As the Council has not identified the housing completions on an annual basis, it is not possible to determine when any of these completions actually occurred.

Homes for Scotland therefore request that the windfall completions data presented in Tables 1 and 2 by the Council is supplied on an annual basis for the period 2013/14 to 2017/18 in line with Background Report 9.

Homes for Scotland notes that the Council has attempted to go further than was requested by the Reporter. The Council has identified sites that are not allocated in the adopted LDP but have been identified in the Strategic Housing Investment Plan funding to commence (HFS09).

However, the Council omits that several of these sites are included in the housing land supply as set out in the Housing Land Audit 2017 (CD027). This document informs the Proposed LDP and therefore programmed completions from these sites have been taken into account.

Only Dubbs Road, Port Glasgow, Strone Farm, Greenock and Upper Bow, Greenock are not included in the Housing Land Audit 2017.

However, all sites other than Strone Farm, Greenock are included in the finalised Housing Land Audit 2018 (HFS01).

This includes the sites identified as private sector in the adopted LDP which are now affordable sites in the SHIP. The Reporter should note that these previously private sites were identified by the Council in the adopted LDP and not promoted by home builders as part of the adopted LDP. It is therefore not surprising that these sites have not proven effective for private home building since the LDP's adoption and are now being taken forward as affordable sites by the Council and its partners.

Based on this evidence, Homes for Scotland considers that the following contributions from windfall sites may be expected from 2021 to 2029:

- a private windfall allowance **0** homes per annum is appropriate; and

- an affordable windfall allowance of **30** homes per annum would be appropriate.

For the purposes of this LDP Examination, if the Reporter concludes that the housing land requirements are not met, Homes for Scotland recommends that those sites before this LDP Examination that promoted by home builders are allocated to address any emerging housing land shortfall.

Accordingly, as the Housing Land Audit 2018 presents the most up to date housing supply data, the Proposed LDP should be updated to reflect this evidence in accord with Policy 8 of the approved SDP.

Date: 15th February 2019