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*improving living in scotland*



**RESPONSE TO WEST DUNBARTONSHIRE PROPOSED LOCAL  
DEVELOPMENT PLAN 2018**

**NOVEMBER 2018**

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Homes for Scotland (HFS) is the voice of the home building industry in Scotland, representing some 200 companies and organisations which together deliver the majority of the country's new homes.

We are committed to improving the quality of living in Scotland by providing this and future generations of Scots with warm, energy-efficient, sustainable homes in places people want to live.

HFS makes submissions on national and local government policy issues affecting the industry. Its views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from our member companies.

# RESPONSE TO WEST DUNBARTONSHIRE PROPOSED LOCAL DEVELOPMENT PLAN 2018

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## Introduction

1. Homes for Scotland is grateful for the opportunity to comment on the emerging West Dunbartonshire Local Development Plan.
2. These submissions on West Dunbartonshire's Proposed LDP have been reviewed and agreed by Homes for Scotland's Strathclyde Area Committee.

## Executive Summary

3. *Homes for Scotland welcomes the opportunity to comment on the Proposed LDP. We support the ambitious approach to business creation, retention and the delivery of new job opportunities. However, we do not consider that the plan currently demonstrates an equally ambitious and pragmatic approach to the delivery of new homes. A more balanced spatial strategy will be required to deliver the new homes West Dunbartonshire needs and to attract and retain existing businesses and workers.*
4. *We consider that the all tenure housing land requirement for the full plan period, to 2030 should be 3,694. Against this requirement we consider there is a shortfall of at least 205 dwellings. Additional allocations of effective sites will be required to make up this shortfall.*
5. *In addition to the need for further allocations we consider that the spatial strategy requires a thorough review as there is an overreliance on brownfield sites, which are inherently more difficult to programme and riskier to develop. A more balanced strategy, including greenfield sites (which have been allocated for business use), would provide a more robust housing supply, better suited to providing the new homes West Dunbartonshire needs.*
6. *We support the continuation of the policy not to seek affordable housing provision on private housing sites. We welcome this pragmatic approach which is sensitive to the economic realities of development within West Dunbartonshire.*
7. *The vision set out in the plan is achievable, but changes to the spatial strategy are necessary if it is to be realised. If these changes are not made before the submission of the plan for examination we consider a Hearing session is necessary to undertake a thorough review and discussion of the sources of West Dunbartonshire's housing land supply.*

## Overall Vision and Spatial Strategy

8. Homes for Scotland shares West Dunbartonshire's optimism about investment in new business premises and the expansion of existing operations. We broadly agree with the principle of focusing development in and around the existing urban areas.

9. We also support the desire to reduce the amount of vacant land and Homes for Scotland members have been responsible for significant development on brownfield land in recent years within West Dunbartonshire. However, brownfield land does not always represent the most sustainable, appropriate or viable option for development and so a balanced approach will be necessary if the increase in housing delivery which is required is to be realised. This could involve allocation of greenfield land to augment the development prospects of brownfield sites and the allocation of greenfield sites in appropriate locations.
10. Overall, we welcome the emphasis on economic development within West Dunbartonshire and the provision of new infrastructure. However, to make the most of these opportunities they need to be complemented by a robust spatial strategy which will provide new opportunities for delivering the increase in housing delivery West Dunbartonshire needs to achieve. We consider that the Introduction and Spatial Strategy sections could place more focus on the delivery of new homes to support the ambitions for economic regeneration. It is regrettable that the willingness to make greenfield land available for businesses uses is not matched by a similarly pragmatic approach to housing delivery.

### Housing Supply Target and Housing Land Requirement

11. The Housing Supply Targets (HST) and Housing Land Requirements (HLR) for the 2012-24 and 2024-29 periods for West Dunbartonshire are set out in Clydeplan 2 (hereafter “the SDP”). The Planning etc. (Scotland) Act 2006 Part 1, Section 16(6) sets out that Local Development Plans (LDPs) must be prepared to be consistent with the Strategic Development Plan. Furthermore, Scottish Planning Policy (SPP) makes clear that these are the targets which the LDP should plan to meet.

*“Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet **the housing land requirement of the strategic development plan** up to year 10 from the expected year of adoption.” (para. 120 our emphasis)*

12. The relevant targets as set out in the SDP are as follows:

*Table 1 SDP Housing Supply Target (HST) and Housing Land Requirement (HLR)*

All-Tenure Targets	2012 – 2024 (12 years)	2024 – 29 (5 years)	2012 - 29
Housing Supply Target (HST)	2760	1150	3910
Housing Land Requirement (HLR)	3170	1320	4490

13. Given that the adoption of the plan is taking place part way through the SDP period, a further adjustment to these targets is required to take account of completions to date. The Reporter’s conclusions in the recent Dundee LDP examination (ref. LDP-180-2, issued 9 October 2018) are instructive on how the Housing Land Requirement should be calculated. TayPlan, the strategic development plan covering Dundee, sets out targets starting in 2016. The Reporter stated that

*“I consider that, in order to meet the HLR in TAYplan and the terms of SPP (above), the proposed plan would need to address the TAYplan requirement from 2016, and the 10-year period from the expected date of adoption of the proposed plan. On the*

*assumption that the proposed plan is adopted in 2019 (see below), that would mean the plan would need to address the HLR for the period 2016-2029” (para. 7, p. 69).*

14. In response to the suggestion that applying the HLR from the beginning of the SDP period would inflate the requirement for housing land, the Reporter concluded that
- “I do not accept the suggestion that this approach would artificially inflate the housing land requirement in the proposed plan. Instead, it would ensure that the LDP fulfils its share of the requirement for the region, and that any under-performance in the first few years of the SDP is taken into account in setting the requirement for the local development plan. **Otherwise, it could be argued the LDP would fail to accord with the SDP, as is required by statute.**” (para. 8, p.70, our emphasis)*
15. For these reasons the approach in the proposed LDP (Table 1, p.76) is incorrect as it does not take into account completions to date. Instead it just applies the 2012-24 HLR to the remaining 7 years of the period on a pro-rated basis. Such an approach would result in unmet housing need and demand between 2012 and 2017 not being planned for and going unmet. It is not compatible with the legal and policy framework set out above.
16. We consider that in order to accord with the SPP and Planning Act, the HLR should be calculated by subtracting completions to date from the 2012-24 HLR figure and adding this to the 2024-29 HLR. Given that the planned adoption of the Proposed LDP is January 2020, a further adjustment needs to be made to ensure it plans for 10 years following the date of adoption (i.e. to 2030), as required by the SPP (para. 120), because the SDP targets only run until the end of March 2029.
17. The Dundee Reporter deals with this scenario by adding the annual average of the HLR for the 2016-28 period to cover the additional year to 2029. Applying the same approach here would add give an HLR for the 2024-30 period of 1,584. This is derived by dividing the 2024-29 HLR by 5 to give an annual average which is then added to the 2024-29 HLR to give the HLR to 2030 i.e. 1,320 + (1320/5).
18. The issue of completions is complicated as West Dunbartonshire completions data is different to that produced by the Scottish government, as set out in Table 2. This is an issue which is evident across the Clydeplan area, not just West Dunbartonshire.

*Table 2 Past Completions*

	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
Scottish Government Completions	126	219	356	312	127	124
West Dunbartonshire (2017 HLA)	194	202	310	223	131	
Difference	-68	17	46	89	-4	

19. As the WDC figures can be disaggregated by housing submarket area and because the latest 2017 Housing Land Audit uses this data we have used these figures for the purposes of our calculations to ensure consistency. However, this data should be revisited at the LDP examination stage to take into account the 2018 Housing Land Audit, or subsequent iterations if available to ensure the most up-to-date data is used, as required by the SDP (para. 6.66).

20. Using the methodology outlined above in combination with the WDC completions figures provides an HLR of 2,110 to 2024 and 3,694 for the plan period (Table 3).

*Table 3 HFS HLR and HST Calculations*

	2012-24	2024-29	2029-30*	Total
Clydeplan Housing Supply Target	2760	1150	230	3910
Clydeplan Housing Land Requirement	3170	1320	264	4490
Completions 2012-17	1060			
Revised Housing Supply Target (i.e. less completions)	1700	1150	230	2850
<b>Revised Housing Land Requirement (i.e. less completions)</b>	<b>2110</b>	<b>1320</b>	<b>264</b>	<b>3694</b>
Increase Compared with WDC stated HLR	261	0	264	525
* This equates to 1/5 of the 2024-29 HST/HLR which provides the annual average of the HST/HLR over this period. This ensure the plan covers a 10-year period from adoption. This calculation is consistent with the approach of the Dundee Reporter.				

21. For the private housing and the Dumbarton and Vale of Leven Housing Market Area, the updated figures are set out in Table 4. These need to be planned to be met as well as the all tenure requirement across the Authority, as required by Policy 8 of the SDP.

*Table 4 Sub-HMA and Private Supply and HLR Analysis*

WDC Private Supply	2012-24	2024-30	Total
Private HLR	2070	1032	3102
Completions 2012-17	699		
Revised HLR	1371	1032	2403
Dumbarton and Vale of Leven Private Supply			
Dumbarton and Vale of Leven HLR	1040	430	1470
Completions 2012-17	594		
Revised HLR	446	430	876
Clydebank Private Completions 2012-17	105		

22. Clydebank is within the Greater Glasgow North and West sub-housing market area. As this is a cross boundary sub housing market area which also includes part of East Dunbartonshire and Glasgow it is not possible to provide a precise calculation with the available data. However, it is clear that delivery in Clydebank has been exceptionally low and across Glasgow as a whole only c. 30% of the 2012-24 HST had been delivered by the midpoint of the period (March 2018). Whilst relatively better delivery across East Dunbartonshire will have contributed to supply in the Greater Glasgow North and West sub-housing market area, it is evident that significant improvements in the delivery of new housing will be necessary. The HLR for the submarket area is 7,430.

## Housing Land Supply

### Housing Land Supply Position

23. The agreed 2017 HLA programmed 2,516 completions for the 2017-24 period. In addition, the Proposed LDP suggests capacity exists for a further 1,136 completions by 2029. Table 5 below sets out the sources of this supply.

*Table 5 HFS Analysis of Housing Land Supply*

Housing Land Supply	2017-24	2024-29	2029-30*	Total
Agreed 2017 Audit Programming	2516			2516
Post 2024 supply on sites programmed to deliver completions before 2024 in the 2017 HLA		683	32	715
Post 2024 supply on sites not programmed to deliver completions before 2024 in the 2017 HLA		208		208
Post 2024 supply on sites disputed by HFS (Dalquhurn & Little Mill)		125		125
SHIP sites not in 2017 HLA		110		110
Increased capacity compared with HLA (Dalquhurn)		10		10
<b>Total</b>	<b>2516</b>	<b>1136</b>	<b>32</b>	<b>3684</b>
<b>Surplus / Shortfall compared with HFS HLR</b>	<b>406</b>			<b>-10</b>
<b>Surplus / Shortfall compared with WDC HLR**</b>	<b>667</b>			<b>483</b>
*HFS Adjustment for Queens Quay (Plots 8-12) as not complete at 2029 using pre-2024 annualised programming				
** As the HLR only cover the period to 2029, only programming to 2029 is considered (i.e. 3684 – 32 = 3,652)				

24. We would dispute the inclusion of programmed completions on Dalquhurn and Little Mill, as Homes for Scotland disputed the inclusion of these sites in the 2017 HLA as they are constrained and have been in the HLA, with no progress for 27 and 22 years respectively. We also consider that the programming for Queen's Quay is over-inflated and inconsistent with the figures in the agreed 2017 HLA. An extrapolation of the agreed completions programming into the period beyond 2017 is set out in Appendix 1. This shows that the site will be capable of delivering 369 dwellings in the period for 2024-29 and 401 dwellings for 2024-30, compared with WDC programming of 429 for 2024-29 (Appendix 2). Taking these into account provides the programming set out in Table 6, giving an all tenure shortfall of 205 dwellings.
25. Having regard to the post 2024 sites which are not programmed to deliver completions prior to 2024, they have been in the HLA for an average of 12 years (with a range of between 7 and 22 years) and are not anticipated to deliver new supply in the next 6 years. These are therefore challenging sites to deliver. Whilst we note the relatively modest programming, we consider that the delivery of such sites over the Plan period is questionable and likely in some cases to slip beyond 2030. We have not factored this into the calculation of housing land supply above but



consider a wider review of the quality of the housing supply should be undertaken in addition to seeking to make up the identified shortfall.

Table 6 HFS Position on All Tenure Housing Land Supply

Housing Land Supply	2017-24	2024-29	2029-30*	Total
<b>Accepted</b>				
Agreed 2017 Audit Programming	2516			2516
Post 2024 supply on sites programmed to deliver completions before 2024 in the 2017 HLA, less disputed Queens Quay Programming		623	32	655
<b>Query</b>				
Post 2024 supply on sites not programmed to deliver completions before 2024 in the 2017		208		208
SHIP sites not in 2017 HLA		110		110
<b>Dispute</b>				
Post 2024 supply on sites disputed by HFS (Dalquhurn & Little Mill)		0		0
Increased capacity compared with HLA (Dalquhurn)		0		0
<b>Total (less disputes)</b>	<b>2516</b>	<b>941</b>	<b>32</b>	<b>3489</b>
<b>Compared with HFS HLR</b>	<b>406</b>			<b>-205</b>
<b>Compared with WDC HLR**</b>	<b>667</b>			<b>288</b>
*HFS Adjustment for Queens Quay (Plots 8-12) as it is not forecast to be complete by 2029. Pre-2024 annualised programming is used.				
** As the HLR only cover the period to 2029, only programming to 2029 is considered (i.e. 3684 – 32 = 3,652)				

26. It is unclear why SHIP sites which are referred to as priority in the 2017/18 SHIP have been programmed beyond 2024. Whilst we would not dispute their inclusion, we consider that clarity should be provided on how they will be delivered and what if any funding is in place. It is also notable that a substantial uplift in the rate of Social Rented housing delivery is programmed over the plan period. Over the 5 years to 2017 an average of 72 dwellings per annum (dpa) was delivered. This is forecast to increase to 99 over the 2017-29 period. Homes for Scotland is supportive of this ambition but in the interests of maintaining a robust housing land supply consideration should be given to ensuring sites allocated for social rent are attractive to both the private and social sectors.
27. Private supply over the period totals 2,398 dwellings at best, which results in a marginal shortfall against the revised HLR set out in Table 4. This figure has been arrived at using agreed 2017 HLA programming and the post-2024 programming with the adjustments set out in para. 23 (more detail in Appendix 1 and 2). However, as the following section sets out, this should be treated as a best-case scenario as it relies on brownfield sites which have been allocated for a significant period of time without progress. There will be slippage in the delivery of at least some of these sites.



28. As Table 6 sets out we consider that West Dunbartonshire has an all-tenure shortfall of housing land supply over the plan period and additional allocations will be required to rectify this. The potential for programme slippage is also important given the reliance on brownfield sites and 2017/18 completions (124) amounting to 50% of what was programmed (249). We consider the supply figure of 3,489 should be considered a best-case scenario.

Reliance on Brownfield Land and Programming Implications

29. It is important to note that the Proposed LDP relies entirely on the extant housing land supply with the four additional 'long term release' sites not anticipated to deliver over the plan period. It is entirely reliant on brownfield sites. Therefore, it is relevant to consider the completions which have been achieved in recent years.

30. All-tenure completions averaged 212 dpa between 2012 and 2017, however, they have significantly reduced in recent years to 127 and 124 respectively in 2016/17 and 2017/18 (according to Scottish Government data). Over the same period average private sector completions averaged 140dpa but were just 58 and 82 respectively in 2016/17 and 2017/18 (according to Scottish Government data).

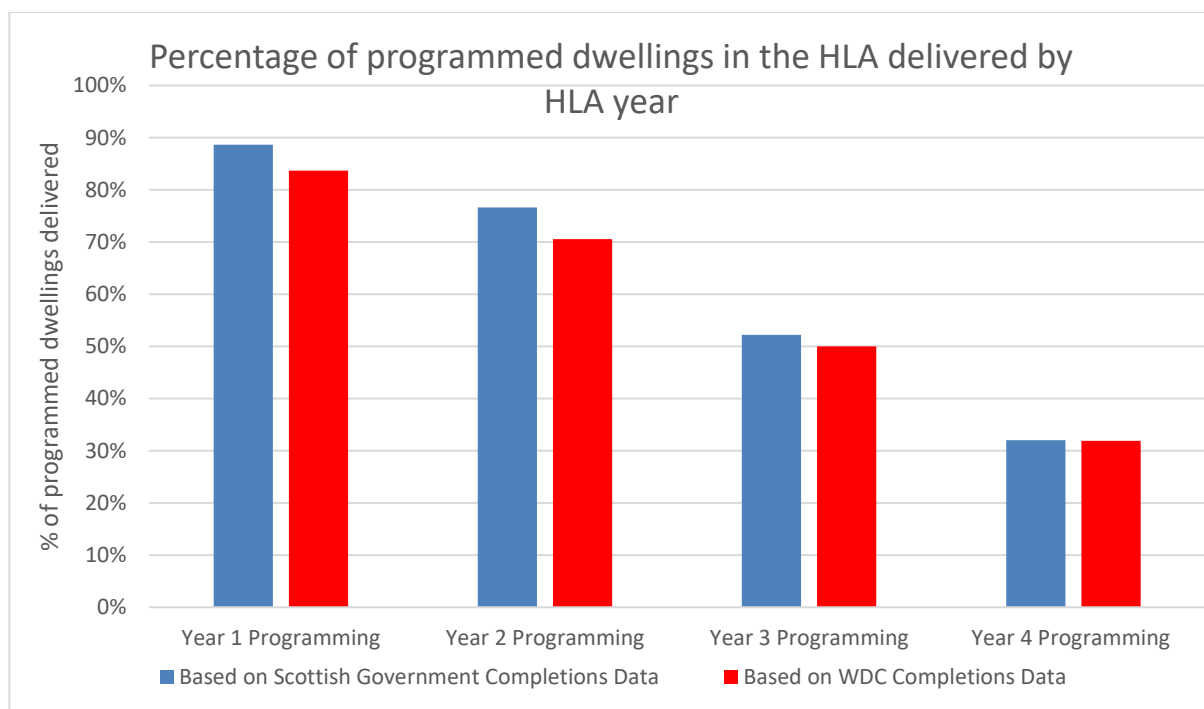


Figure 1 Comparison of HLA programming against actual completions

31. The agreed 2017 HLA programmes an average level of completions of 359 dpa (all tenure) and 243 private dpa. This represents a significant uplift on recent trends. We consider it is necessary as part of the Plan preparation process to interrogate how this step-change in completions will be achieved in light of recently reduced completion levels. We are aware of, and fully welcome, the work of the Council in this regard such as to bring forward development on sites such as Queen’s Quay. However, brownfield development is inherently difficult to programme as it is riskier to develop. Remediation and site preparation represent significant unknowns which

can reveal costly surprises when development commences even after extensive initial investigation. Figure 1 illustrates this point.

32. Figure 1 is based on analysis of the 2013, 2014, 2015, 2016 and 2017 audits. As such the sample size is greatest for year 1 (5 for Scottish Government completions and 4 for WDC completions) and reduces by 1 thereafter. It is not intended as a critique of the audit process as pre-2024 programming was agreed between HFS and WDC in 2017 and represents a reasonable programme for the delivery of a given site, all going well. Rather it is intended to illustrate that across a larger sample of sites not everything will go to plan on all of them and particularly on brownfields sites where construction is yet to begin, due to the uncertainties outlined above. Furthermore, for longer term programming, the amount of uncertainty increases, as there is more work to be undertaken before a start on site which can be a source of delays.
33. It is also not to suggest an issue in principle with the marketability of sites in West Dunbartonshire. September 2018 [Registers of Scotland](#) house price data showed a 11.9% year on year increase, making it the authority with the highest percentage increase across Scotland, well above the 5.8% National Average.
34. Furthermore, recent new build completions evidence shows robust demand for allocations in the right locations. For instance, the Lomondgate development averaged annual completions over 80 dwellings per annum between 2012/13 and 2015/16, with the rate peaking at 100 dwellings in 2014/15. It is important that the Proposed LDP seeks to respond positively to these market signals.
35. The Lomondgate development provides an example of how this could be done. This mixed-use development involved a substantial amount of brownfield land but also some greenfield land. It provides a positive example of how further development can be delivered within WDC through a balanced approach. Prioritising brownfield land but also recognising that greenfield land will be necessary both to provide a more robust and generous housing land supply and to unlock the development of some brownfield sites.
36. The current housing land supply does not meet HLR, there is a shortfall of 205 dwellings. However, as we set out in our MIR response and as demonstrated above, there will be slippage in the programming as it is wholly reliant on the delivery of brownfield sites. Additional sites should therefore be allocated to refresh the housing land supply, as we argued at the MIR stage, which is essentially unchanged over the last 8 years and has failed to deliver the new housing WDC needs. Even if a relatively modest 20% slippage occurred, the shortfall would increase to 905 against the HLR, resulting in the HST being missed.
37. Homes for Scotland fully supports WDC's business growth agenda including the spending of the City Deal spending on the Exxon site. The support for the expansion of existing businesses is also welcomed. However, this ambitious approach to job creation must be matched by an active and practical strategy to allow the necessary homebuilding to take place to meet the need arising from job creation as well as existing unmet need.
38. A fundamental goal of the City Deal is to lever in £3.3bn of private sector investment. We believe that the home building can deliver substantial investment in West

Dunbartonshire supporting the vision of the Proposed LDP, but a balanced approach to the allocation of housing land with new allocations of effective sites is necessary to ensure this can be achieved.

## Policy H1 Housing Land Supply

39. Homes for Scotland supports the consideration of what action may be needed should a deficit in five-year housing land supply arise. We also welcome the continued engagement with WDC over the production of the Housing Land Audit and are pleased that programming in the latest 2017 audit could be agreed. However, we consider that the current wording of Policy H1 does not sufficiently reflect the urgency with which a shortfall in effective supply needs to be rectified.

40. A shortfall in effective supply reflects, by definition, a lack of deliverable housing sites, but also normally arises after a deficit in housing completions. It therefore is usually more than just a warning sign that need may go unmet in the future, but clear evidence that housing delivery has been inadequate to meet identified need and demand. It should be amended as follows (**addition, deletion**):

The Council will provide a minimum of five years ~~A five-year~~ effective **housing land supply of housing land will be maintained at all times for both the Housing Sub-Market Areas and for the Local Authority Area (all-tenure and private) to ensure that the Housing Supply Target is met in full over the development plan period as set out in Policy 8 of the SDP.** ~~throughout the lifetime of the Plan to enable delivery of the strategic housing requirement. This will be monitored and updated annually using housing completions to date and the effective housing land supply set out in the Housing Land Audit.~~

41. ~~through the Housing Land Audit. The Council will prioritise the early delivery of sites within the established land supply. If the audit identifies a shortfall in the five year effective land supply. In this instance, the Council will~~ **take prompt action to rectify this by supporting housing proposals which are capable of delivering completions in the next five years and compatible with national policy.**

- ~~• Can address infrastructure constraints;~~
- ~~• Are in a sustainable location; and~~
- ~~• Do not undermine the strategic focus on urban regeneration and brownfield redevelopment.~~

42. These changes would ensure the policy better reflects the urgency of the situation. Also given that if such a situation arose policies for the supply of housing would be considered out of date in accordance with the SPP (para. 125), it would be superfluous to include restrictive policies such as those struck through above, as they would be out of date at the time of their application. Infrastructure would be a material consideration and sustainability is covered in depth in the SPP.

## Locality Place Planning

43. Homes for Scotland welcomes in principle the concept of Locality Place Plans (LPPs). We recently held a productive meeting with Officers and discussed LPPs and would like to be involved in their development. Whilst we are overall supportive of the

LPPs, we consider it is essential that they should not undermine the principle of the plan-led decision-making process. Indeed, the current production of the first local development plan since 2010 provides an excellent opportunity for community involvement in plan-making.

44. The plan-led decision-making process is set out in Statute and this in principle can be helpful in providing confidence to investors that sites allocated in the plan will be supported for development. Furthermore, the problems with an overreliance on Supplementary Planning Guidance were clearly set out by the Chief Planner in a letter on 15 January 2015, it states that “A very high level of reliance on supplementary guidance raises questions about the transparency of the development planning process as a whole.” These concerns about its appropriateness are reflected in the ambitions of the Planning Bill to remove such guidance.
45. Nevertheless, we consider that there is a place for LPP’s and would welcome the opportunity to work with WDC in their implementation. We consider some changes are necessary as set out below to ensure that home builders and other stakeholders who will play a role in delivering the Proposed LDP are involved. Furthermore the changes are necessary to ensure that further supplementary guidance does not place in jeopardy the delivery of allocated sites (**addition, deletion**):

*“The Local Development Plan Authority will adopt Locality Place Plan(s) prepared within West Dunbartonshire as Supplementary Guidance where they meet the following criteria:*

- a) Accords with the provisions of the Local Development Plan;*
- b) Reflects the land use allocations contained within the Local Development Plan and does not propose alternative uses for these allocations which would be contrary to the Plan;*
- c) Reflects the aspirations of the Local Development Plan, through Policies CP1 and CP2, to create and deliver high quality and successful places;*
- d) A place based assessment of the area has been undertaken and provides justification for any development or improvement proposals;*
- e) A spatial map detailing the Communities’ aspirations for their Place; and*
- f) The Locality Place Plan has been subject to significant and wide-ranging engagement and consultation with different ages, groups and individuals within that community or communities **including landowners and developers with interests within the area covered;***
- g) The supplementary guidance will place no additional financial burdens upon allocated sites or otherwise impact upon their viability through additional restrictions or requirements over and above those which are set out in the development plan.”***

46. These changes help to reduce the negative impact upon investor confidence the adoption of such guidance could have, whilst allowing LPPs to facilitate increased engagement in the planning system.

## Policy GI2 Open Space Standards

47. Whilst the importance of greenspace is recognised, we would question the need for set standards on this, particularly given the focus on maximising the use of brownfield land. Strict standards in addition to detailed other guidance on placemaking, would limit the ability of Officers to take into account site specific considerations in assessing whether a given development was acceptable in the round. The standards should instead be referred to as indicative, allowing developments to be properly considered at the application stage.

## Policy CON4 Installation of Superfast Broadband for New Developments

48. Whilst all home builders have a strong incentive to provide high quality broadband connections to new properties, it is important to recognise that the connection speed itself depends on wider infrastructure. Therefore, we do not consider it is appropriate to require specific connection speed as the wider infrastructure is not controlled by homebuilders on a given site and it would therefore not be possible for them to upgrade it.
49. Where wider network upgrades are required Home Builders would be keen to see such improvements realised, but this is the responsibility of infrastructure providers. Homes for Scotland does work with providers on these issues and would welcome the opportunity to discuss these matters further with the Council if required.
50. For the reasons set out above, we consider the Policy should be amended as set out below (**addition**, ~~deletion~~):

*New residential as well as business and industrial developments shall be required, **where appropriate**, to install the necessary infrastructure to enable all new premises to be connected to full fibre optical networks, and in accordance with the relevant telecommunication provider's standards. ~~Developers of these sites shall be required to ensure that all new premises have a direct full fibre connection ensuring that speeds in excess of 50 Megabytes per second can be provided at the premises and, as a consequence, are encouraged to have early discussions with the relevant telecommunications provider when formulating their development proposals.~~*

## Policy RE4 Heat Generation

51. Homes for Scotland has consistently raised concerns over the potential that a requirement to deliver heat networks in new developments could further undermine the commercial viability of those developments. Revisions to Building Standards that have achieved new homes that are already 75% more efficient than they were in 1990. Further revisions to Building Standards are likely to see new homes require next to zero space heating by 2021.
52. We consider that a continuation of a fabric first approach through buildings standards rather than planning policy is appropriate. The merit of safeguarding land within new developments which include new homes with far higher energy efficiency performance than older housing stock is questionable. We consider this land could be better utilised for immediately beneficial uses such as new homes or green space if appropriate rather than future projects which are no currently planned and do not have funding agreed. As such we consider the policy wording should be amended as follows (**additions**, ~~deletions~~)

*The Council will also be supportive of the provision of energy centres, where appropriate, within new development. All new heat generating developments should, where possible, be located close to potential heat users and the possibility of developing heat networks, including district heat networks, should be investigated. Proposals for new development should **give consideration to whether connection to existing ensure that the site can be connected to Energy Centres and Heat Networks, including district heating could be achieved.** , which may be developed in the future. Developers should ensure that the necessary capacity, infrastructure and land for future connections and the potential development of Energy Centres are safeguarded within the site.*

*Where heat networks are not viable, micro-generation and heat recovery technologies, within or associated with individual properties, will be encouraged by the Council. All proposals will require to meet with the Development Management criteria set out in Paragraph 169 of Scottish Planning Policy. Thermal treatment plants will also require to meet with SEPA's Thermal Treatment of Waste Guidelines 2014.*

## **Policy RE5 Low and Zero Carbon Buildings**

53. As set out above we consider that a continuation of a fabric first approach through buildings standards rather than planning policy is most appropriate. Furthermore, new homes are already 75% more efficient than they were in 1990 helping to reduce energy consumption.
54. In this context focusing on onsite low and zero carbon generating technologies adds significant cost and complication to building design and construction for minimal reward. We consider it would be better to allow home builders to focus on building efficient homes while directing initiatives to reduce carbon emissions at on strategic power generation sources. For these reasons we consider that RES5 should be deleted. The ambition of the policy, to reduce emissions, is already covered by Building Standards and does not need duplication. Furthermore, the reliance on brownfield sites, many with already challenging viability, means further policy requirements need to be weighed against the desirability of new development coming forward on vacant land.

## **Conclusion**

55. Homes for Scotland support West Dunbartonshire's ambitious plans for economic growth. However, we feel it would be a missed opportunity if these were not matched by a similarly ambitious and credible strategy to boost housing delivery to meet need and demand and help to foster further economic growth.
56. We consider the current spatial strategy is too narrowly focused to achieve this and meet the housing targets set out in the SDP. We therefore consider there is a need for a more balanced strategy including the allocation of new sites on greenfield land.
57. There is a proven market for new housing in West Dunbartonshire on allocated sites in the right location. We would urge the Council to amend the plan, allocating additional effective sites, so that the economic benefits of new home building can be fully realised.



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## Appendix 1: Queens Quay Adjusted Programming

	Remaining Capacity at March 2017	Agreed 2017 HLA Programming							HFS Extrapolated Programming						Total Completions	Remaining Capacity at March 2030
		17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30		
QUEENS QUAY - EAST YARD	300				40	40	40	40	40	40	40	20			300	0
QUEENS QUAY - PLOT 7	189				30	30	30	30	30	30	9				189	0
QUEENS QUAY - PLOTS 8-12	556				32	32	32	32	32	32	32	32	32	32	320	236
<b>Total</b>		<b>408</b>							<b>401</b>							

## Appendix 2: HFS Amendments to post 2024 Supply

### Private post- 2024 output by site

<u>HLA ref.</u>	<u>Site</u>	<u>Post 2024 capacity</u>
WD0401	Notre Dame, Dumbarton	40
WD0463	Queens Quay, Clydebank	<del>360</del> 300 (or 332 to 2030)
WD0482	Shed 7, Dumbarton	58
WD0501	Levenbank Terr, Jamestown	86
WD0518	Heather Ave, Alexandria	20
WD0552	Old Mill Garage, Hardgate	25
WD0554	Braidfield HS, Clydebank	16
WD0564	Bowling Basin, Bowling	30
WD0572	Garshake, Dumbarton	25
WD0574	Rosebery, Clydebank	20
WD0578	OLSPs HS, Dumbarton	25
WD0300	Dalquhurn, Renton	<del>40</del> 0
WD0302	Leven Shipyard, Dumbarton	<u>20</u>
		<b>765 665</b>

### Social rented post-2024 output by site:

<u>HLA ref.</u>	<u>Site</u>	<u>Post 2024 capacity</u>
WD0463	Queens Quay, Clydebank	69
WD0300	Dalquhurn, Renton	<del>70</del> 0
WD0392	Dumbarton Rd, Clydebank	10
WD0544	Boquhanran Rd, Dalmuir	34
WD0546	Melbourne Ave, Clydebank	25
WD0355	Littlemill Distillery, Bowling	<del>25</del> 0
WD0549	Muir Road, Dumbarton	10
WD0126	Caledonia Street, Dalmuir	18
SHIP(WDC)	Clydebank East	50
SHIP(RSL)	Bellsmyre Regeneration	<u>60</u>
		<b>374 276</b>
<b>Total</b>		<b>941</b>