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**RESPONSE TO ABERDEEN CITY AND ABERDEENSHIRE DRAFT
HOUSING LAND AUDIT 2016**

02 May 2016

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.

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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.

1. Introduction

1.1 Homes for Scotland welcomes the opportunity to provide input into the Aberdeen City and Aberdeenshire Draft Housing Land Audit (HLA) in advance of the arranged meeting on Tuesday 17th May at which we will discuss and agree the HLA. This response is not a line-by-line appraisal of the Draft HLA, rather a set of more general comments and observations from Members on the Draft HLA. We would be happy to go through the draft in more detail with both planning authorities in advance of the meeting on 17th May if that would be useful to ensure we are in a position to agree the HLA on that date.

2. Housing Land Audits: Homes for Scotland Procedures

2.1 Homes for Scotland published its guidance document "*Housing Land Audits: Homes for Scotland Procedures*" in May 2015. This document sets out useful information on programming of different types of housing site, as well as realistic standard assumptions for lead in times and delivery. This document is attached to this response as an Appendix for information. Many of the comments made in the remainder of this response have an evidence base taken from this guidance document of HLA Procedures.

2.2 Realistic Standard assumptions are:

- Build time for a house is 20 weeks;
- From start on site to first lawful completion takes 6 months;
- No start can be made on site until access and all statutory consents are in place;
- It can take an average of 18-24 months from submission of a planning application in principle to the delivery of first units on a site. Where the site is in the hands of a developer at the time of application, this timeframe will likely be shorter; and
- Lawful completions will not begin within 2 years of receipt of permission in principle.

2.3 Homes for Scotland uses realistic default assumptions on maximum annual completion rates, unless up-to-date industry evidence is available. These include:

- Detached / Semi: Urban 30 units p/a (24 if no developer) / Rural 10-20 units p/a (depending on past trends)
- Flats: Urban 38 units p/a (30 if no developer)/ Rural 20 units p/a
- Strategic Sites: 3 builders acting in a single year = 90 units p/a (72 if no developer)
- Small Sites: 50% effective rule west Scotland, local trend –informed % assumption elsewhere.

- As a default, the programme for the first year of production should be no more than 50% of a full year output.

3. Status of Sites and Programming

- 3.1 There are a number of sites with a status that does not reflect the projected activity on site. For example, many sites have completions programmed for 2016 which have a status of “Full Planning Permission”, rather than “Under Construction”. We question whether these sites will be able to deliver the units indicated within the Draft HLA for 2016 if construction is not yet underway.
- 3.2 Examples of this include Page 5 of the Draft HLA, site references A/AC/R/629, A/AC/R/630, and A/AC/R/632. There are a large number of sites with this issue through the Draft HLA.
- 3.3 It may be that the programming is correct for these sites, and simply the Status has not been updated for these sites. Our Members are key to providing advice on the status of sites, and this issue is certainly the case for site A/AC/R/582 Park Road which has a status of “Planning Permission in Principle” but is, in fact, under construction with the house builder Barratt agreeing with the projected completion of 60 units in 2016.
- 3.4 There are also a number of sites within the Draft HLA with a high volume of completions programmed for 2017 for which full planning permission has not yet been secured according to the Status within the Audit. For example, with site A/AC/R/067 at Grandhome, we would question whether 50 units could be delivered in 2017 if the site does not yet have its Approval of Matters Specified in Condition secured, and construction started soon on site. There are other examples of this throughout the Draft HLA. Homes for Scotland Grampian House Builders’ Committee has agreed that 36 units per annum (per outlet) within the AHMA is a reasonable assessment for forecasting, and the Homes for Scotland Procedures for Housing Land Audits suggest maximum delivery rates of 30 units per annum for detached / semi-detached within an urban setting, therefore looking at both assumptions, it is unlikely that 50 units could be delivered in 2017 as well as securing the necessary permissions for the site.
- 3.5 We encourage the standard assumptions used by Homes for Scotland for Housing Land Audits (as set out within the Homes for Scotland Procedures document attached, and briefly set out within Section 2 of this report) to be used to ensure that the status of sites matches the programmed completions.
- 3.6 This is particularly relevant for the first year of production. Homes for Scotland default assumptions suggest that the programme for the first year of production should be no more than 50% of a full year output. Therefore we would suggest that the build rate for the first year may be set too high for sites

like A/AC/R/578 Broadfoot Works and question whether it is achievable to deliver 130 units in 2017. There are other sites with this same issue within the Draft HLA.

4. Cumulative Build Rates

- 4.1 Homes for Scotland considers that there is an issue in some areas, particularly Inverurie and Peterhead with cumulative build rates, when compared to previous completions.
- 4.2 Members have indicated to us that both Aberdeen City and Aberdeenshire Councils have agreed to review the build rates for the HLA, and we would like to see any review being reflected within the HLA to ensure that previous build rates are not continuing to be used.
- 4.2 We would like to see the most accurate picture of the current programming for the area reflected within the HLA through the most up to date information possible on build rates.

5. Effective Sites

- 5.1 From anecdotal evidence from Members, there are a number of sites within the Draft HLA which are currently constrained, mainly due to ownership, which are identified within the Draft HLA as effective within either the Effective Supply (Five Year) or the Effective Supply (Post Five Year). We suggest that these sites are updated within this year's HLA and marked as "constrained".
- 5.2 Similarly, there are a number of sites within the Draft HLA with no developer identified. It is unlikely that these sites will be able to deliver any completions in 2016 or 2017 without a developer on board. We therefore suggest that these sites should be marked as "constrained" within this year's HLA. These sites could come back into the effective supply next year if the status changes and there is backing from a developer or house builder, but for now they should not be considered part of the effective housing land supply.
- 5.3 We suggest that the tables are brought up to date to reflect the current position with each site, changing the status from Effective to Constrained sites where appropriate for this year to accurately reflect the current position.

6. Tenure and Other Information

- 6.1 It is unclear from Appendix 2 of the HLA – the Detailed Statement of Draft Established, Constrained and Effective Land Supply for Aberdeen City and Aberdeenshire the tenure of each site. Some other planning authorities (for example Glasgow City Council) set out information on the type of unit (flat or house), site area, separate detail on category of owner and name of builder,

as well as tenure. Some of this information could be very useful for the Aberdeen City and Aberdeenshire HLA.

7. Conclusion

- 7.1 We are aware that a number of Homes for Scotland Members have made separate submissions on the Draft HLA particularly in respect of programming.
- 7.2 Homes for Scotland looks forward to engaging further with Aberdeen City and Aberdeenshire Councils on the 2016 Housing Land Audit. We are happy to meet to discuss these comments in more detail, and provide further examples to support the statements put forward within this response.

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