



**Response to Renfrewshire Council
Housing Land Supply Supplementary Guidance (Update) 2017**

May 2017

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 House Builders Committee

Representation:

Homes for Scotland welcomes the update to Renfrewshire Council's Housing Land Supply Supplementary Guidance (SG).

This provides an opportunity to refresh matters following the adoption of the SG in December 2015.

There are two matters that require to be modified prior to adoption.

Table, page 3

Homes for Scotland notes the Table and statement on housing land shortfall on page 3 of the SG. This Table presents a housing supply target and programming of current housing sites based on the finalised 2016 Housing Land Audit. Renfrewshire Council identifies that this shortfall is 230 homes.

The purpose of the SG is to meet any housing land shortfall as a result of the adopted Local Development Plan (LDP) not identifying sufficient land to meet the housing need and demand.

Scottish Government was clear in giving notice to Renfrewshire Council to adopt the SG that:

The Renfrewshire LDP is required to allocate a range of sites for housing which are effective or expected to become effective to meet the housing land requirement up to 10 years beyond the predicted year of the plan adoption, ensuring a minimum of 5 years effective land supply at all times.

The purpose of this modification was to align the SG with Scottish Planning Policy (SPP), paragraph 119. SPP states:

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. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met.

In order to meet this requirement from Scottish Government, Renfrewshire Council is required to assess its housing supply target over the first LDP period 2008/09 to 2020 as well as the second LDP period 2020 to 2025.

This is in accord with the approved Strategic Development Plan paragraph 4.92 which states that the LDP *...should therefore allocate sufficient land which is effective, or likely to be capable of becoming effective, so as to deliver the scale of house completions required across all tenures both in the period to 2020, and from 2020 to 2025.*

Accordingly any housing supply target presented in the Table on page 3 needs to

take account as to whether the housing supply target for previous years has been met in full. If not, any unmet element housing supply target needs to be rolled forward.

The purpose of this is to deliver the scale of house completions required across all tenures both in the period to 2020, and from 2020 to 2025 in accord with the approved SDP as stated in paragraph 4.88.

The following all tenure housing completions have occurred in Renfrewshire since 2008:

	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	Total
Private	-	357	234	282	166	320	477	577	2,413
Affordable	99	278	93	50	0	219	0	101	840
All Tenure	99	635	327	332	166	539	477	678	3,253

The SDP only assesses the affordable / social sector in 2008 and therefore only completions for the affordable / social sector are required for this year.

There have been 2,413 private completions between 2009 and 2016 as well as 840 affordable completions between 2008 and 2016. In total, there have been 3,253 all tenure completions between 2008/09 and 2016.

The housing supply target stated in the adopted LDP is 9,100 homes for the period 2008/09 to 2020 and 2,700 homes for the period 2020 to 2025.

The remaining all tenure housing supply target to be met for the period is therefore 5,847 homes (9,100 housing supply target minus 3,253 completions). Over the remaining four years of the period 2016 to 2020, this equates to an all tenure housing supply target of 1,462 homes per annum.

For the period 2020 to 2025, the all tenure housing supply remains at 2,700 homes or 540 homes per annum.

Accordingly these annual all tenure housing supply targets should be adopted in the Table presented on page 3 of the SG.

Therefore based on the finalised 2016 Housing Land Audit and taking account of housing completions to date, the remaining housing supply target for the periods 2008/09 to 2020 and 2020 to 2025 is as follows:

Year	2016/17	2017/18	2018/19	2019/20	2020/21
Housing Supply Target	1,462	1,462	1,462	1,462	540

Homes for Scotland notes that Renfrewshire Council has adopted the finalised 2016 Housing Land Audit for the purposes of the SG. Renfrewshire Council are aware that the finalised 2016 Housing land Audit has not been agreed with the house building sector through Homes for Scotland.

Should the Renfrewshire Council seek to continue to use the finalised 2016 Housing

Land Audit for this SG, Homes for Scotland requests a paragraph below the Table on page 3 is as follows:

The Programming of Current Housing Sites presented in the table above is based on the finalised 2016 Housing Land Audit. This housing land audit has not been agreed with the house building sector through Homes for Scotland. The latest agreed housing land audit is the 2015 Housing Land Audit. The preference of both Renfrewshire Council and Homes for Scotland is for assessments of the housing land supply to be undertaken using only agreed housing land audits.

Homes for Scotland has examined the *Programming of Current Housing Sites* based on the finalised 2016 Housing Land Audit. Homes for Scotland notes that this is based on the private sector land supply only.

As stated earlier, in accord with the approved SDP and SPP this should be based on the all tenure land supply.

Accordingly, the *Programming of Current Housing Sites* should be amended based on the finalised 2016 Housing Land Audit as follows:

Year	2016/17	2017/18	2018/19	2019/20	2020/21
Programming of Current Housing Sites	703	845	857	889	901

Homes for Scotland notes that the Table on page 3 demonstrates the shortfall. This shortfall should be recalculated adopting the all tenure housing supply targets as well as the all tenure housing land supply.

The outcome of this reassessment is as follows:

Year	2016/17	2017/18	2018/19	2019/20	2020/21
Housing Supply Target	1,462	1,462	1,462	1,462	540
Programming of Current Housing Sites	703	845	857	889	901
Surplus/Shortfall	-759	-617	-605	-573	+361

The outcome of this reassessment identifies that the finalised 2016 Housing Land Audit indicates that there is currently a shortfall of 2,193 homes in order to meet assessed housing need and demand between 2008/09 and 2021.

Homes for Scotland request that the above Table replaces the Table on page 3 and that the statement on page 3 be amended to state:

The finalised Housing Land Audit 2016 indicates that there is currently a shortfall of 2,192 all tenure units.

This approach is in accord with the approved SDP, the adopted LDP and SPP.

Other Considerations

Homes for Scotland notes that in the Other Considerations on pages 6 and 7 have not been modified since the original SG adopted in December 2015.

This is particularly relevant to reference to the year 2019. The LDP was adopted in 2014. Accordingly, the five year period under consideration for the original SG was 2014 to 2019.

As part of this update, Renfrewshire Council is required to consider the five year period beyond the base date. The base date for the updated SG is the finalised 2016 Housing Land Audit. The five year period under consideration is therefore 2016 to 2021.

This is supported by the Reporter's requirement for this SG is to include a detailed framework to guide the release of additional housing land where a five year supply of effective housing land is not being maintained.

Accordingly, all references to 2019 should be replaced with 2021 to reflect the five year period under consideration.

Suggested alteration:

Delete Table and statement on page 3 and replace with the following:

The finalised Housing Land Audit 2016 indicates that there is currently a shortfall of 2,193 all tenure units.

Year	2016/17	2017/18	2018/19	2019/20	2020/21
Housing Supply Target	1,462	1,462	1,462	1,462	540
Programming of Current Housing Sites	703	845	857	889	901
Surplus/Shortfall	-759	-617	-605	-573	+361

The Programming of Current Housing Sites presented in the table above is based on the finalised 2016 Housing Land Audit. This housing land audit has not been agreed with the house building sector through Homes for Scotland. The latest agreed housing land audit is the 2015 Housing Land Audit. The preference of both Renfrewshire Council and Homes for Scotland is for assessments of the housing land supply to be undertaken using only agreed housing land audits.

Modify Other Considerations bullet points 1 and 3 to update to the relevant five year period. Modification are shown in red as follows:

- Supporting information to demonstrate the effectiveness of the site and guarantee delivery in the short term (up to 2021) must be submitted with any planning application for residential development;
- Details of the phasing of the development will require to be submitted with any planning application;
- The site must be capable of being substantially built out by 2021. Should development not commence by 2021 the sites will revert back to green belt land designation;