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**RESPONSE TO  
SOUTH LANARKSHIRE LOCAL DEVELOPMENT PLAN  
MAIN ISSUES REPORT 2017**

**11 MAY 2017**

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## 1. Introduction

- 1.1 Homes for Scotland is the voice of the home building industry in Scotland, with a membership of some 200 organisations together providing 95% of all new homes built for sale across the country as well as a significant proportion of affordable housing.
- 1.2 Homes for Scotland is 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.
- 1.3 Homes for Scotland 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.
- 1.4 These submissions on South Lanarkshire Council's Main Issues Report for their next Local Development Plan have been reviewed and agreed by Homes for Scotland's Strathclyde Area Committee.

## 2. LDP2 Spatial Strategy (Questions 1 and 2)

- 2.1 Any review of a local development plan is an opportunity to embrace change and new opportunities and need not simply be a rolling forward of the current plan's vision and spatial strategy. That said, change for change's sake is in no party's interest and as such an appropriate balance must be struck.
- 2.2 Within South Lanarkshire, the new opportunities that have emerged relate to the Glasgow City Deal and this envisages a significant investment in infrastructure within the area. On that basis, Homes for Scotland would encourage the emerging local development plan to adopt a more positive and ambitious outlook that better reflects the City Deal opportunities.
- 2.3 The proposed Vision and Spatial Strategy are adequate statements of intent in their own right but perhaps fail to effectively encompass the potential that will inevitably arise through the City Deal and associated subsequent investments that should also arise.
- 2.4 On the basis of the above, Spatial Strategy Alternative Option 2 need not be viewed as negatively as it is within the Main Issues Report if the local development plan includes a strong policy framework that requires all

developments to also meet or not undermine other development plan objectives and policies.

### 3. Policy 12 Housing Land (Questions 13 and 14)

3.1 It is noted that the Main Issues Report reflects the Housing Land Supply targets as set out in proposed Clydeplan 2 and therefore includes a private tenure housing Generosity Margin of 10% as also set out within the proposed Clydeplan 2. The Council will be aware of the Reporter's recommendations in respect of Clydeplan 2 and in particular the proposed application of a 15% Generosity Margin to all tenures. As such, Table 4.2 should perhaps more accurately read as follows (changes shown in red):

	Housing Supply Target 2012 – 2029 (SDP2 – Schedule 6)		Housing Land requirement 2012 – 2029 (with 15% generosity) (SDP2 – Schedule 7)	
	Total	Per Annum	Total	Per Annum
All tenure	16,200	953	18,640	1,096
Private	12,460	733	14,330	843
Public (social)	3,740	220	4,310	253

- 3.2 Notwithstanding that the Main Issues Report reflects the full 17 year plan period set out within Clydeplan 2, there are some differences between the sub-periods set out within Clydeplan 2. There is a higher annual Housing Supply Target for the first 12 year sub-period for private housing and a subsequently slightly reduced annual Target for the following 5 year sub-period.
- 3.3 That would mean, once a 15% generosity margin is incorporated, that the annual private tenure Housing Land Requirement should be at least 874 homes between 2012 and 2024 falling to around 768 new homes per annum between 2024 and 2029 (if all housing needs and demands had been met to 2024).
- 3.4 The effect of this adjustment may appear minor but it also assumes that a housing need of c330 new private tenure homes that is predicted to arise before 2024 may not be met until afterwards. On that basis, Table 4.2 should also be split into the two sub plan-periods as set out within Clydeplan 2.
- 3.5 In any event, the application of a 15% Generosity Margin across all tenures will necessitate the local development plan identifying land for at least a further 1,200 new homes, that is effective or capable of becoming effective up to 2024, than is currently the case, a significant proportion of which is likely to be required in the early part of the plan period.
- 3.6 Table 4.3 of the Main Issues Report then sets out the picture on land supply as defined within the 2015 Housing Land Audit. The broad assumption then implied is that because the Established Land Supply equates to land for up to

19,398 houses, very little else needs to be done to ensure that the Housing Supply Target will be met.

- 3.7 However, the Non-Effective Land Supply is dominated by the Community Growth Areas and whilst these will deliver a number of new homes up to 2029, they will also likely continue to be developed beyond 2029 (especially where developer interest has yet to be identified). In addition, the Non-Effective Land Supply also includes some large brownfield sites that have so far failed to come forward into development for over 10 years.
- 3.8 An honest and robust assessment of the true potential of these sites to meet the strategic housing needs and demands within South Lanarkshire is therefore critical to ensure that the emerging local development plan has a credible baseline to work from.
- 3.9 Notwithstanding the implications made through Table 4.3 of the Main Issues Report, to take into account various local housing market factors, 3 sites for up to a total of 295 new homes are identified as possible additional sites for inclusion within the local development plan. Therefore, before any adjustments to take into account the necessary amendments to Clydeplan 2 are made, land for up to 300 homes is still needed which then suggests that the emerging plan needs to actually release land for up to 1,500 new homes that is effective of capable of becoming effective up to 2024.
- 3.10 With over 50% of the Effective Housing Land Supply classified as potential within the Housing Land Audits, it is essential that the emerging local development plan is based on a land supply position where all stakeholders can have confidence in this land will actually be capable of becoming effective.
- 3.11 The 2016 Housing Land Audit has not been formally agreed by Homes for Scotland. Therefore, to then ensure that the local development plan reflects the most up to date position, it is proposed that, following a full and comprehensive review of the 2017 Housing Land Audit, the position on Effective and Non Effective Housing Land Supply is agreed between the Council and Homes for Scotland together with the remaining Housing Land Requirement to meet the Housing Supply Targets to 2024 and 2029.
- 3.12 It is also noted that there are apparent discrepancies regarding past completion rates when comparing figures in the Main Issues Report Monitoring Statement, current and past Housing Land Audits and also the Scottish Government records for new build housing completions in South Lanarkshire.
- 3.13 Homes for Scotland would advocate for a clear summary of past housing completions in line with the guidance set out within PAN 2/2010: Affordable Housing and Housing Land Audits. The PAN states at paragraph 53 that *'if the audit is to provide an accurate picture of housing land supply, it will be*

*necessary to ensure that the annual completions are recorded accurately and shown in the audit.*

- 3.14 The PAN also states later in that paragraph *'all sites completed in a given year should be listed in a separate schedule and a comprehensive table of historic annual completions should also be provided.'* In addition, Homes for Scotland would continue to encourage that Housing Land Audits are provided online so they can be easily accessed for reference and consultation.
- 3.15 Prior to the development and publication of the proposed local development plan, Homes for Scotland strongly encourages South Lanarkshire to publish an up to date housing land audit that clearly highlights historic past completions with detailed information and evidence as to where the figures were obtained from and calculated.

#### **4. Conclusions**

- 4.1 Given the view on Housing Supply Targets set out in Clydeplan 2 and the associated Housing Needs and Demand Assessment and that a higher generosity margin should be applied than is currently the case across all tenures, it is likely that sites for up to at least a further 1,200 new homes should be brought forward in the local development plan for delivery between 2012 and 2024. This will be in addition to the land for the 295 new homes that South Lanarkshire Council has already identified as being necessary.
- 4.2 That additional requirement may be adjusted once the 2017 Housing Land Audit and subsequent remaining Housing Land Requirements are agreed.

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**Table 1: Calculation of Housing Land Requirements**

	2012 - 2024			2024 - 2029			2012 - 2029		
	Private	Affordable	All Tenure	Private	Affordable	All Tenure	Private	Affordable	All Tenure
1 Housing Supply Target (Clydeplan 2 adjusted)	9,120	2,640	11,760	3,335	1,100	4,435	12,455	3,740	16,195
- Per Annum	760	220	980	667	220	887	733	220	953
2 Simple disaggregation of HST	8,792	2,640	11,432	3,663	1,100	4,763	12,455	3,740	16,195
- Per Annum	733	220	953	733	220	953	733	220	953
<b>VARIANCE (1 and 2)</b>	<b>-328</b>	<b>0</b>	<b>-328</b>	<b>328</b>	<b>0</b>	<b>328</b>	<b>0</b>	<b>0</b>	<b>0</b>
Source: Clydeplan 2 Background Paper 8: <a href="http://www.clydeplan-sdpa.gov.uk/files/BR8_Final2.pdf">http://www.clydeplan-sdpa.gov.uk/files/BR8_Final2.pdf</a>									
3 Housing Land Requirement (SL LDP2 MIR)	9,664	2,640	12,304	4,026	1,100	5,126	13,690	3,740	17,430
- Per Annum	805	220	1,025	805	220	1,025	805	220	1,025
4 Housing Land Requirement (HLS + 15%)	10,490	3,040	13,530	3,840	1,270	5,110	14,330	4,310	18,640
- Per Annum	874	253	1,128	768	254	1,022	843	254	1,096
Source: Clydeplan Examination FIR01 - Q11 (Table 11.2): <a href="http://www.dpea.scotland.gov.uk/Document.aspx?id=397036">http://www.dpea.scotland.gov.uk/Document.aspx?id=397036</a>									
<b>VARIANCE (3 and 4)</b>	<b>-826</b>	<b>-400</b>	<b>-1,226</b>	<b>186</b>	<b>-170</b>	<b>16</b>	<b>-640</b>	<b>-570</b>	<b>-1,210</b>
- Per Annum	<b>-69</b>	<b>-33</b>	<b>-102</b>	<b>37</b>	<b>-34</b>	<b>3</b>	<b>-38</b>	<b>-34</b>	<b>-71</b>
Completions (2012 to 2015)	1,898	282	2,180	-	-	-	1,898	282	2,180
Remaining Housing Supply Target (@ 2015)	7,222	2,358	9,580	3,335	1,100	4,435	10,557	3,458	14,015
Remaining Housing Land Requirement (@ 2015)	8,305	2,712	11,017	3,840	1,270	5,110	12,145	3,982	16,127