



**Response to Renfrewshire Council
Renfrewshire Local Development Plan 2 Main Issues Report**

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

Main Issues Report Questions

Homes for Scotland welcomes the opportunity to provide comment on the Renfrewshire Local Development Plan – Main Issues Report 2017.

Question 1 – Local Development Plan Objectives and Policy Coverage

Do you agree that the revised Local Development Plan objectives and policy coverage set out in the Main Issues Report are appropriate for the next Renfrewshire Local Development Plan?

If not, what alternative objectives/ policies would you propose and why?

Homes for Scotland welcomes the five objectives of the emerging Local Development Plan (LDP) as proposed in the Main Issues Report (MIR) and, in particular, the importance of *Place* as a LDP objective.

As stated in Section 1 *Opportunities in Renfrewshire*, Renfrewshire Council expects the emerging LDP will continue to meet the housing need and demand by delivering a range and choice of housing as well as increasing the supply of new housing.

However, Homes for Scotland notes that there is no change to the objective *...development locations supported by existing or planned physical infrastructure and services...* as set out in the adopted LDP.

Homes for Scotland's preference would be to identify additional locations in marketable areas that can accommodate homes to ensure that the full range of housing need and demand can be met.

It is important that these further locations can be supported by existing or planned physical infrastructure and services.

As part of the emerging LDP, further sites will be required to meet the all tenure housing land requirement set out in the emerging Clydeplan Strategic Development Plan (SDP) to ensure that a five year effective housing land supply is maintained at all times.

Once approved by Scottish Ministers and ratified by member authorities, the SDP will identify the housing land requirement for the period 2012 to 2024 and 2024 to 2029.

The Examination Report for the adopted LDP concluded that further housing land releases above and beyond those allocated will be required to meet the housing land requirement in full and that this should be met through Supplementary Guidance (SG).

It is noted that the MIR Monitoring Statement does not evaluate whether the Council applied the Housing Land Supply SG in the determination of planning applications. However, the MIR Monitoring Statement confirms that Policy P2 *Housing Land Supply* has not been used to determine planning applications since the adoption of the LDP in 2014.

Homes for Scotland is unaware whether further housing land releases have been

granted planning permission to meet the shortfall in housing land supply since the Housing Land Supply SG was adopted in December 2015.

It can only be concluded that the adopted LDP has not adequately met its housing need and demand to date and therefore this remaining issue is required to be resolved through the preparation of the emerging LDP.

Homes for Scotland notes that there is a minor change to the objective *...regeneration and renewal of existing urban areas as energy efficient, healthy and safe places...* as set out in the adopted Local Development Plan.

This objective now states *...creation of strong communities and attractive places focusing on the regeneration and renewal of existing urban areas supporting sustainable development and a low carbon economy.*

Whilst Homes for Scotland acknowledges this objective, the Council will be aware that brownfield and previously used sites require significant investment to facilitate their redevelopment. These types of sites can therefore be financially unviable and do not represent feasible development opportunities in their entirety.

Homes for Scotland would therefore urge the Council to strike an appropriate balance between the release of both brownfield and greenfield land through new LDP allocations.

Renfrewshire Council needs to consider addressing any shortfall by allocating further greenfield land so that greater certainty can be given to planning decisions based on an adopted LDP.

This conclusion was reached in the Report of Examination for the emerging SDP for Issue 05 *Spatial Development Strategy*, where findings on housing-related matters (as set out in Issues 10-13) indicate that greenfield land will also be needed to meet the housing land requirements.

Scottish Planning Policy paragraph 50 identifies that in developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.

Homes for Scotland therefore suggests an amendment to the second objective under *Place* as follows:

creation of strong communities and attractive places by focusing on the regeneration and renewal of existing urban areas as well as appropriate settlement expansion along the urban edge to supporting—sustainable development and a low carbon economy.

Homes for Scotland considers that this amendment to the objective is in accord with the emerging Clydeplan SDP and SPP.

Question 2 – City Deal Policy

In considering future City Deal Investment, do you agree with the preferred option of preparing an additional policy which will allow benefits of City Deal to be delivered across Renfrewshire?

Should another strategy/policy be pursued and if so what should this be?

Homes for Scotland welcomes the Preferred Option to establish a policy which enables the benefits and opportunities of City Deal investment to be delivered as well as supporting the implementation of potential developments across Renfrewshire.

This proposed policy should support the delivery of a range and choice of housing as well as increasing the supply of new housing to meet all of the housing need and demand that will arise within the Council area.

Question 3—Renfrewshire’s Housing Land Requirements

In considering the provision of housing to meet Renfrewshire’s housing need and demand, is the preferred strategy set out in the Main Issues Report correct or should an alternative strategy be pursued?

If so, what should this strategy be?

Homes for Scotland notes the commentary on *Renfrewshire’s Housing Land Requirements*. Homes for Scotland objects to both the Preferred and Alternative Options.

In accord with SPP Diagram 1, the Renfrewshire Local Housing Strategy (LHS) and the emerging Clydeplan Strategic Development Plan (SDP) are required to align in terms of housing supply targets. Once approved by Scottish Ministers and ratified by member authorities, the housing supply targets set by the SDP will be required to be adopted by the Local Development Plan (LDP).

The Report of Examination confirms that a 15% generosity will be applied to both the affordable sector and private sector housing supply targets to identify the housing land requirement.

The housing land requirement must be met in full over both periods identified - 2012 to 2024 and 2024 to 2029.

Homes for Scotland welcomes and supports the increase in the affordable sector housing supply target from 150 homes per annum to 200 homes per annum.

It is noted that Council is proposing a housing land requirement for private sector homes lower than that set out in the Report of Examination.

The Report of Examination requires that the emerging LDP deliver 6,050 private sector homes from 2012 to 2024 and 1,260 private sector homes from 2024 to 2029. This represents the private sector housing supply target over both periods and equates to 505 homes per annum from 2012 to 2024 and 252 homes per annum from 2024 to 2029.

The Report of Examination has identified a generosity allowance of 15% to be applied to all tenures rather than the 10% stated in the MIR being applied to the private sector

only.

Accordingly, the emerging LDP needs to make provision for 6,960 private sector homes from 2012 to 2024 and 1,450 private sector homes from 2024 to 2029. This represents the private sector housing land requirement over both periods and equates to 580 homes per annum from 2012 to 2024 and 290 homes per annum from 2024 to 2029.

Applying the generosity allowance of 15% to the affordable sector housing supply target of 200 homes per annum means a housing land requirement of 2,760 affordable sector homes from 2012 to 2024 and 1,150 affordable sector homes from 2024 to 2029.

Accordingly, the housing supply targets and housing land requirement to be adopted by Renfrewshire Council for the LDP should be as follows:

| | 2012 to 2024 | 2024 to 2029 |
|---|---------------------|---------------------|
| Affordable Sector Housing Land Requirement | 2,760 | 1,150 |
| Private Sector Housing Land Requirement | 6,960 | 1,450 |
| All Tenure Housing Land Requirement | 9,720 | 2,600 |
| Annual All Tenure Housing Land Requirement | 810 | 520 |

The emerging LDP is required to demonstrate that this housing land requirement is met in full over both LDP periods. Homes for Scotland notes that no new land allocations are proposed by the Council in the emerging LDP. However, the Council has identified the following as *Pipeline Sites*:

| Site Ref | Name | Capacity |
|-----------------|---|-----------------|
| LDP2023 | Good Shepherd, Old Greenock Road, Bishopston | 10 |
| LDP2024 | South of Woodend House, Houston Road, Houston | 25 |
| LDP2025 | West of Woodend House, Houston Road, Houston | 6 |
| LDP2026 | East Fulton Farm, Darluith Road, Linwood | 66 |
| LDP2028 | Johnshill, Lochwinnoch | 5 |
| LDP2031 | Barbush North, Johnstone | 130 |
| LDP2032 | West of Burnfoot Road, Lochwinnoch | 130 |
| LDP2037 | Barrhill Crescent, Kilbarchan | 60 |
| LDP2046 | Northbar Phase 2, Erskine | 56 |
| LDP2053 | Auchenlodment Road, Elderslie | 40 |
| LDP2054 | Land at Erskine Hospital, Erskine | 250 |
| LDP2057 | Golf Driving Range, Rannoch Road, Johnstone. | 75 |
| LDP2064 | Land to West of Thriplee Road, Bridge of Weir | 50 |
| LDP2066 | Lochwinnoch Golf Club, Lochwinnoch | 15 |
| LDP2077 | Golf Course at Newton Avenue, Elderslie | 20 |
| Total | | 938 |

The Council has determined that these *Pipeline Sites* are appropriate for allocation subject to a shortfall in the housing land supply being identified.

In light of the required revisions to the all tenure Housing Land Requirement noted

above, Homes for Scotland suggests that these *Pipeline Sites* are allocated subject to determination of whether they are effective in accord with PAN 2/2010 *Affordable Housing and Housing Land Audits*. All sites should be capable of delivering within the 10 year plan period to assist the Council maintain a five year effective housing land supply at all times. If any are unable to be deemed to be capable of becoming effective during the plan period, further allocations must be identified.

Homes for Scotland notes the rationale for the Council not allocating any site is set out in the MIR Background Paper 1 *Housing Requirements*.

Homes for Scotland notes that the calculation set out in Table 4 *Meeting Renfrewshire's Housing Land Requirements* is contrary to both the Report of Examination and SPP.

The Council must demonstrate how the housing land requirement will be met in full over both periods – 2012 to 2024 and 2024 to 2029. Currently, the MIR has assessed whether the emerging plan could meet the housing land requirement only from 2018 to 2028.

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

The preference of Homes for Scotland is for assessments of the housing land supply to be undertaken using agreed housing land audits. Homes for Scotland understand that this is also the preference of Renfrewshire Council.

The latest agreed housing land audit is the 2015 Housing Land Audit.

Homes for Scotland recommends that following agreement of the 2017 Housing Land Audit the housing land supply is reassessed against the correct housing land requirement in full over each period (2012 to 2024 and 2024 to 2029) to establish whether Renfrewshire's all tenure Housing Land Requirement will be met from the supply of housing land outlined in the latest housing land audit.

Renfrewshire Council will also be required to insert a policy mechanism to maintain a five year effective housing land supply at all times. The Report of Examination confirms that the test for a five year effective housing land supply has to be undertaken 3 ways as set out in the modification to Policy 8:

- By Local Authority Area (All Tenure);
- By Housing Sub-Market Area (Private Only); and
- By Local Authority Area (Private Only).

If a shortfall is established in any of these methods, further housing land releases are required in accord with Policy 8.

The policy framework presented in the MIR will need to be modified to reflect the Report of Examination for Clydeplan SDP once approved.

Homes for Scotland proposes to meet with the Council following the publication of the agreed 2017 Housing Land Audit to establish the scale of new allocations required for the emerging LDP.

Question 4—Affordable Housing

Is it appropriate to deliver affordable housing targeted at North and West Renfrewshire sub market housing areas?

Should another policy approach be used and if so what?

Homes for Scotland notes the Preferred Option for a targeted policy with up to 25% of housing delivered on major residential developments in either North or West Renfrewshire, should be affordable units.

However, Homes for Scotland supports the Alternative 2 Option, an affordable policy targeted at North and West Renfrewshire where the levels of affordable housing are negotiated on a case by case basis with developers demonstrating how they intend to meet local need and demands through a mix of housing.

Affordable housing provision should be provided across a range of tenures, including social housing for rent, intermediate housing for rent or sale, discount sale and entry level market starter homes. This is in accord with SPP.

A maximum provision of 25% affordable housing should be provided on site where demonstrated to be appropriate.

Homes for Scotland considers that a protocol could be established to ensure a consistent approach of dealing with affordable housing on a case by case basis and would be willing to work with the Council to develop this.

Question 5—Bishopton

In considering Renfrewshire's future housing options, is the preferred strategy to build upon the potential of a sustainable place such as Dargaval Village at Bishopton the correct one?

Should another strategy be pursued and if so what?

Homes for Scotland notes the Preferred Option to prepare a revised masterplan based on the overall provision of an additional 1,500 new homes and associated supporting facilities and services within the boundary of the existing Community Growth Area.

Homes for Scotland requests that this revised masterplan is prepared in advance of the Proposed LDP, to inform the allocation of the site in the LDP and provide certainty to the proposed development strategy. Commentary on the revised masterplan will be made through the Proposed LDP consultation process.

Homes for Scotland also requests that this further land release at Bishopton is allocated subject to determination of whether it is effective in accord with PAN 2/2010 *Affordable Housing and Housing Land Audits*. This further land release at Bishopton needs be capable of delivering within the 10 year plan period to assist the Council

maintain a five year effective housing land supply at all times.

If this is not demonstrated, further land releases will be required to be allocated in addition to Bishopston.

Question 6—Paisley South

Do you agree with the preferred option set out in the Main Issues Report for Paisley South?

Should the alternative be pursued or should another strategy be pursued and if so what?

Homes for Scotland notes the Preferred Option for a masterplanned approach to be developed for previously developed sites at the University of the West of Scotland's Campus and at Dykebar Hospital with the community, stakeholders, key agencies and service providers to plan for a new well designed place.

Homes for Scotland requests that this masterplan is prepared in advance of the Proposed LDP, to inform the allocation of the site in the LDP and provide certainty to the proposed development strategy. Commentary on the revised masterplan will be made through the Proposed LDP consultation process.

Homes for Scotland also requests that this is allocated subject to determination of whether it is effective in accord with PAN 2/2010 *Affordable Housing and Housing Land Audits*. Paisley South needs be capable of delivering within the 10 year plan period to assist the Council maintain a five year effective housing land supply at all times.

If this is not demonstrated, further land releases will be required to be allocated in addition to Paisley South.

Question 7—Infrastructure Provision/Developer Contributions

Is there a requirement for a specific developer contribution policy for the next Renfrewshire Local Development Plan?

Homes for Scotland supports the Preferred Option to continue what is currently set out in the Adopted Renfrewshire Local Development Plan that developers need to make good any infrastructure, services and facilities deficits associated with new development.

Question 8—Housing for key specific housing groups

Do you agree with the preferred approach to consult on the need for gypsy/traveller sites?

Do you think the Renfrewshire Local Development Plan should have a new policy on small privately-owned Gypsy/Traveller and Travelling Showpeople site provision?

Are there other provisions for key specific housing groups that should be considered?

No comment.

Question 9—Supporting the Delivery of Heat Networks

In considering the delivery of heat networks, do you agree with the preferred option of

preparing a Heat Network Opportunity Map for the next Local Development Plan with Supplementary Guidance promoting the delivery of heat networks across Renfrewshire?

Should another option be pursued and if so what should this be?

No comment.

Question 10 – Renewables

In considering the potential for Onshore Wind Development within Renfrewshire do you agree with the preferred option outlined in the Main Issues Report?

Should another option be pursued and if so what should this be?

No comment.

Question 11— Local Development Plan Spatial Strategy

Do you agree that the Local Development Plan should focus on the existing Spatial Strategy and the Key Development Priorities as set out in Figure 9 of the Main Issues Report?

If not, what alternative Spatial Development Strategy/Key Development Priorities do you propose and why?

Homes for Scotland does not support the Preferred Option.

An Alternative Option would be to identify additional locations in marketable areas that can accommodate homes to ensure that the housing need and demand can be met in full.

It is important that these further locations can be supported by existing or planned physical infrastructure and services. As part of the emerging LDP, further sites will be required to meet the all tenure housing land requirement set out in the emerging Clydeplan Strategic Development Plan to ensure that a five year effective housing land supply is maintained at all times.

Once approved by Scottish Ministers and ratified by member authorities, the SDP will identify the housing land requirement for the period 2012 to 2024 and 2024 to 2029.

Homes for Scotland recommends that following the publication of the agreed 2017 Housing Land Audit, the housing land supply is reassessed against the correct housing land requirement in full over each period (2012 to 2024 and 2024 to 2029) to establish whether Renfrewshire's all tenure Housing Land Requirement will be met from the supply of housing land outlined in the latest housing land audit.

If further housing land is required, settlements other than those set out in the Spatial Strategy should be considered for further development.

This is in accord with the conclusions reached in the Report of Examination for the emerging, where findings on housing-related matters (as set out in Issues 10-13) indicate that greenfield land will also be needed to meet the housing land requirements.

SPP paragraph 50 also identifies that in developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.

Question 12 - Additional Comments

Are there any other main planning issues that the Main Issues Report did not identify, if yes, what are they and why?

No comment.

Date: 24th May 2017