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**RESPONSE TO
WEST DUNBARTONSHIRE LOCAL DEVELOPMENT PLAN
MAIN ISSUES REPORT 2017**

22 SEPTEMBER 2017

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1. Introduction

- 1.1 Homes for Scotland (HFS) 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 HFS 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 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.
- 1.4 These submissions on West Dunbartonshire Council's Main Issues Report (MIR) for their next Local Development Plan (LDP) have been reviewed and agreed by HFS's Strathclyde Area Committee. This response only considers general matters relating to the delivery of new homes through the emerging LDP and site specific questions are not addressed.

2. The emerging LDP Strategy

- 2.1 Any review of a LDP 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 West Dunbartonshire, the new opportunities that have emerged relate to the Glasgow City Deal and this envisages a significant investment in infrastructure in the area. On that basis, HFS would support the emerging LDP in adopting a positive and ambitious outlook that reflects the City Deal opportunities.
- 2.3 It will be important to ensure that the emerging plan allows West Dunbartonshire to fully benefit from the City Deal and other associated investments by ensuring enough land in the right locations is available to deliver sufficient range and choice of housing to meet all housing need and demand.
- 2.4 HFS is acutely aware that the Council is presently forced to make use of a development plan that is some 7 years out of date due to the abandonment of

the 2010 plan. It will therefore be imperative that all stakeholders have confidence in the new plan and an up to date, appropriate development plan context can then be provided to guide future investment and development across West Dunbartonshire.

- 2.5 Ensuring that investor confidence is supported (to allow housing sites to then come forward) is therefore an essential target for this new plan and will be a key factor in avoiding a situation where meeting housing need is forced to resort to a planning by appeal situation.

3. Place-making and Urban Regeneration

- 3.1 It is recognised that West Dunbartonshire Council continues to need to address the legacy of heavy industry that once prevailed across the area. In addition, West Dunbartonshire is uniquely placed between the City of Glasgow and the highly valued landscapes and open spaces of the Loch Lomond and Trossachs National Park as well as the Kilpatrick Hills.
- 3.2 The area also benefits from good links via the Erskine Bridge to Renfrewshire and other areas to the south of the Clyde.
- 3.3 For these combined reasons, it must be expected that West Dunbartonshire can and will deliver new homes to meet housing need and demand. Further opportunity will come about through City Deal investments and through due recognition of the locational potential that exists in parts of West Dunbartonshire. Making sure that market interest is then given appropriate weight in the spatial balance strategy is important to ensure that these opportunities are not squandered.
- 3.4 Responding to this opportunity and potential, West Dunbartonshire has embarked on a bold initiative to promote place-making as a priority for the Council. It is therefore important that the emerging LDP gives potential developers a clear guide as to what is expected of them within West Dunbartonshire. To that end, HFS would offer the following commentary on Questions 12, 13 and 14 as set out within the MIR.
- 3.5 Question 12 seeks a response on whether the emerging LDP should contain a wider range of policies aimed at creating new places and delivering high-quality development or not. As noted above, ensuring that the LDP is as clear as possible in its expectations and aspirations regarding new places and quality of developments will be important to ensure that these can be effectively responded to within proposals.
- 3.6 It will be important that discussions on design and place-making start with a clear set of ground-rules and setting these through emerging LDP policies is therefore an important pre-requisite.

- 3.7 However, West Dunbartonshire Council must also be reasonably flexible and pragmatic in how any policy is applied and if there are clear reasons given as to why a particular approach cannot be adopted without adversely affecting development viability, that must be acknowledged and duly reflected in the emerging policy framework.
- 3.8 HFS's view is that whilst place-making is important, delivering sufficient new homes to meet all housing needs and demands must remain a priority.
- 3.9 Question 13 relates to the production of place-making maps. HFS would support the principle of this in that it can provide a clear view of settlement wide expectations and aspirations. In setting that context, it would be expected that sufficient flexibility remains for developers to be able to deliver developments on individual sites that can also respond to important commercial drivers and constraints.
- 3.10 The level of visual guidance for sites within the emerging LDP is considered within Question 14 and HFS would respond by supporting all and any initiatives that can make development plans more accessible and understandable. However, the LDP is a key policy document that must also contain clear and unambiguous policy statements to reduce the level of necessary interpretation and assumption that could arise with an over-reliance on visual presentation.

4. Housing Supply Targets

- 4.1 It is noted that the MIR reflects the housing land supply targets as set out in proposed Clydeplan 2017 Strategic Development Plan (SDP) and therefore includes a private tenure housing Generosity Margin of only 10% as also set out within the proposed SDP. The Council will be aware that the Scottish Ministers have now Approved Clydeplan 2017 with the recommendations as set out by the Reporters. As such, the targets for West Dunbartonshire will be as follows:

	Housing Supply Target 2012 – 2029 (SDP2 – Schedule 7)		Housing Land requirement 2012 – 2029 (with 15% generosity) (SDP2 – Schedule 8)	
	Total	Per Annum	Total	Per Annum
All tenure	3,910	230	4,490	264
Private	2,550	150	2,930	172
Public (social)	1,360	80	1,560	92

- 4.2 However, it is imperative that there is a clear, up to date position, set out within the LDP on what the Plan has left to meet with regards to the strategic housing land supply targets in order that it is able to meet the national policy test set out at paragraph 115 of Scottish Planning Policy (SPP).
- 4.3 It is the total Housing Supply Target (HST) set at the start of the plan making process that the emerging LDP must ensure can be met through the plan

period. The annual figure is then merely an indication of the average level of delivery that must be aimed for each year.

4.4 On that basis, the 2017 position on land supply targets will be as follows:

		All Tenure	Private	Affordable
a.	Housing Supply Target (2012 – 2029)	3,910	2,550	1,360
b.	Completions (2012 – 2017)	1,060	699	361
c.	Remainder of Housing Supply Target (2017 – 2029) (a. – c.)	2,850	1,851	999
d.	Generosity Margin	15%	15%	15%
e.	Updated Housing Land requirement (2017 – 2029) (c. + d.)	3,278	2,129	1,149

4.5 What is known from the Agreed 2017 Housing Land Audit (HLA) is that there is land for a total of 2,516 new homes programmed to come forward through the period 2017 – 2024 and land for a further 2,882 still available for development at 2024 (the remainder of the Established Land Supply).

4.6 SPP paragraph 119 requires that LDPs ensure that a minimum of 5 years effective land supply is available at all times. At 2017, there is a need to ensure that land for at least 1,188 new homes (the 2017 5-year effective land supply target) is available within West Dunbartonshire between 2017 and 2022 (i.e. $(2,850 / 12) \times 5$); the now agreed 2017 HLA expects 1,697 new homes to be completed during this period.

4.7 Throughout the Plan period, as sites come forward for development and new homes delivered, the remainder of the HST will reduce. Therefore, if the levels of completions as currently predicted within the agreed 2017 HLA are realised, at 2024, the remainder of the HST will be 334 new homes and that is also the 5-year effective land supply target that the Plan would be required to ensure remains available at that time.

4.8 Over the next 7 years, the 2017 HLA is expecting that some 360 new homes will be delivered on average each year. Clydeplan 2 was expecting a minimum average annual delivery rate of 230 new homes albeit that target must be updated to 238 (i.e. $2,850 / 12$) new homes each year based on the completions achieved between 2012 and 2017 if the HST is to be met in full by 2029.

4.9 At 2024, if the current predicted completion rates continue, some 1,800 new homes will likely be delivered from the remainder of the Established Land Supply to 2029 against a potential remaining HST of 334 new homes at that time.

4.10 What this therefore indicates is that the 2017 HLA presents an ambitious view of the delivery of new home within West Dunbartonshire that HFS

nevertheless supports. It should be important that the expected momentum generated by the predicted pace of delivery to 2024 be maintained through the allocation of sufficient land in the right locations within the emerging LDP to ensure that all the potential benefits of new housing developments can be realised.

4.11 In then ensuring that a robust position is presented within the HLA of potential the housing land supply, HFS supports the proposals to delete the following sites from the LDP and Established Land Supply (MIR Question 30):

- Wilson Street, Alexandria
- Pinetrees, Dumbarton
- Crosslet House, Dumbarton
- Lusst Glen, Old Kilpartrick
- William Street, Duntocher
- John Knox Street, Clydebank
- St Eunan's School, Clydebank
- Golfhill Drive, Bonhill
- Gold Street / Raglan Street, Bonhill
- Village Square, Renton
- Valeview Terrace, Dunbarton
- Dalreoch Quarry North, Dunbarton
- Townhead Road, Dunbarton
- Rothesay Dock, Clydebank
- Littlemill Distillery, Bowling
- Milton Brae, Milton, Milton
- 34 Burn Street, Bonhill
- 834 Dumbarton Road, Clydebank

4.12 There has been little progress with these sites coming forward for development, despite their allocation from as early as 1996 in one case, and no obvious appetite to progress their development.

4.13 However, HFS would advocate that the following sites are also deleted from the LDP and Established Land Supply:

- Bonhill Quarry, Bonhill
- Carless Oil Depot, Old Kilpatrick
- North Douglas Street / Former Unity Club, Clydebank
- Dalquhurn, Renton

4.14 The agreed 2017 HLA reflects the limited potential to meet housing need that exists with these sites. As with the 18 sites noted above, there has also been little progress with these further 4 sites coming forward for development, despite their allocation from as early as 1991 in one case, and no obvious appetite to progress their development. HFS members have also become aware of alternative uses being proposed for at least one of these sites which would in any case remove it from the Established Land Supply.

- 4.15 Combined, these 22 sites would remove only 12 potential new homes from the effective land supply and some 971 potential new homes from the Established Land Supply as set out within the agreed 2017 HLA. This would therefore reduce the Established Land Supply to 1,911 possible units (2,882 – 971). With some 881 of these then currently considered non-effective at 2024, it is unclear how many of these potential new homes would be delivered to continue to meet the remainder of the HST to 2029.
- 4.16 As noted above, whilst the land supply situation based on the agreed 2017 Housing Land Audit looks positive at first glance; this is based on an optimistic perspective adopted on programming with many significant assumptions underlying that programming. Therefore, if say only 80% of the programmed completions come to fruition (and excluding in total the 3 of the 18 listed sites that are to be deleted but are shown could generate completions to 2024 in the 2017 HLA), the potential land supply to 2024 would reduce to 2,003 new homes (i.e. (2,516 – 12) x 80%).
- 4.17 An 80% assumption is deemed reasonable based on a brief analysis below of the 2013, 2014, 2015 and 2016 HLAs and the predicted outputs they had for the first year of the Audits which produces a median accuracy of actual completions against programmed first year output of 78%.

Year	2013-14	2014-15	2015-16	2016-17
Programmed Output (1st year)	272	313	276	174
Source	2013 HLA	2014 HLA	2015 HLA	2016 HLA
Completions (2017 HLA)	202	310	223	131
% Actual vs Programmed	74%	99%	81%	75%

- 4.18 At 2024 then, some 847 new homes (i.e. 2,850 – 2,003) would potentially remain to be delivered between 2024 and 2029 from a reliable supply (i.e. land that is presently considered effective or is expected to become effective by 2024) of between 824 (i.e. 1,030 x 80%) and 1,030 (i.e. 1,911 – 881) new homes.
- 4.19 What this therefore points to is a land supply situation that is actually finely balanced between meeting the emerging strategic targets or not; not a situation where there is “*more than enough to provide a generous housing land requirement*” as the MIR suggests at page 40.
- 4.20 The MIR nevertheless, supports the allocation of possibly a further 400 new homes across 8 sites but does not support the allocation of an additional 4 sites which could accommodate around 650 more new homes.
- 4.21 Therefore, in response to Question 15 of the MIR, as noted above, the land supply situation is not as generous as the MIR has assumed. In addition, in HFS’s view there is little justification for the retention of the 4 allocations noted above (which have a combined capacity of 721 units) in addition to the 18 undeveloped housing sites proposed to be deleted by the Council (which have

a combined capacity of 237 units including the 12 units expected to be delivered by 2024).

- 4.22 This would therefore suggest that additional allocations, over and above the combined capacity of those supported by the Council, must be brought forward within the emerging LDP if there is to be a truly generous supply of housing land to meet strategic requirements.
- 4.23 Whilst it is not for HFS to make comments on individual sites, there is concern that the potential additional housing sites proposed by West Dunbartonshire (some of which are supported for allocation and some which are not), cannot be made effective during the lifetime of the new LDP or the principle of allocation is not appropriate.
- 4.24 Whatever sites are to be allocated, there must be confidence with all parties that these will be able to meet at least some of the housing need during the lifetime of the new LDP sites must be in locations that are sustainable as well as being attractive to private sector investment that will be essential to their delivery.

5. Affordable Housing

- 5.1 MIR Questions 17 and 18 consider the matter of affordable housing and whether the current LDP approach should be retained or whether a new affordable housing contribution should be sought.
- 5.2 Whilst West Dunbartonshire has many positives to offer in terms of a housing market, it must be recognised that at present market conditions are generally not good. This then results in higher risks to investment by private developers.
- 5.3 However, the Scottish Government has recently confirmed some £36.5m in funds available between 2017 and 2021 for the delivery of new affordable homes as part of their national target to deliver 50,000 new affordable homes within the current parliamentary term.
- 5.4 This is expected to be more than sufficient funds to deliver significantly more affordable homes than the target of c80 affordable homes per annum as was envisaged by the SDP and as such is more than sufficient to meet the affordable housing need as set out within the Clydeplan Housing Needs and Demand Assessment.
- 5.5 On this basis, HFS remains of the view that an affordable housing contribution cannot be justified within the emerging LDP and as such HFS fully supports the preferred approach of West Dunbartonshire Council on this matter.

6. Climate Change and Green Infrastructure

- 6.1 Question 23 seeks to explore what the appropriate LDP response should be in terms of decarbonisation of our energy system and the provision of district heat networks. HFS continues to urge caution in how district heat networks are sought and whilst the objective of reducing carbon emissions from developments (through their construction and use) is supported, this must be through a pragmatic and balanced approach.
- 6.2 The reality will be that unless a development is close to an existing / proposed heat source, or part of a large mixed-use development with the potential to share / sell heat, an Energy Use / Sustainability Assessment should be sufficient to justify why a heat network is not possible. Spending time and money on a detailed feasibility study just to confirm that a heat network is not viable will delay much needed housing delivery.
- 6.3 The common assumption that a housing developer can also deliver this form of infrastructure and absorb the risks associated with it is also misplaced and inappropriate.
- 6.4 It must be recognised that the starting point on this matter is for new buildings to *“avoid a specified and rising proportion of the projected greenhouse gas emissions from their use”* which is part of the obligation currently set through Section 3F of the Planning Act.
- 6.5 Many home builders have been working towards this goal driven by the changes in Building Standards and significant improvements have been achieved in the overall energy efficiency of buildings. This is the “fabric first” approach and such gains will be permanent improvements to a building where as adding new installations (i.e. low and zero-carbon generating technologies) has the potential to be relatively temporary features which bring with them maintenance and user operation implications that could result in these being switched off.
- 6.6 There is also a risk that if low and zero-carbon generating technologies are required, the further gains in overall building energy efficiency that are possible will not being pursued given the arithmetic advantage that such technologies deliver within the SAP calculations undertaken as part of the Building Warrant process.
- 6.7 The Building Standards will also be continually reviewed and new standards to reduce greenhouse gas emissions will be progressed. It is unfortunate then that Section 3F of the Act appears to encourage the duplication of the activity of Building Standards in reducing emissions and in turn this makes the whole approach more confusing and bureaucratic for those demonstrating compliance and those assessing that demonstration. HFS also strongly agrees with the view that the duplication of legislation is contrary to the aims of the Regulatory Reform Bill, which seeks to simplify regulation and this section of the Act may yet to refined through the current Planning Review.

- 6.8 Nevertheless, it remains relevant that development plans promote the pursuit of more energy efficient buildings and developments to take forward the current obligations set out in Section 3F of the Act (i.e. new buildings are to “avoid a specified and rising proportion of the projected greenhouse gas emissions from their use”) but in so doing, a pragmatic and proportionate approach must also be adopted.
- 6.9 For those reasons HFS would advocate that any policy response within the emerging LDP prioritises the “fabric first” approach with the use of low and zero-carbon generating technologies then a secondary requirement where further efforts are necessary to meet targets.
- 6.10 Specifically, HFS would not support a detailed quantification of the reduction in greenhouse gas emissions from the use of the proposed development at the planning application stage because:
- This would duplicate work that remains to be undertaken at the Building Warrant stage;
 - This could be unnecessarily expensive at a planning application stage;
 - The building performance targets may change as higher building standards are introduced between the planning application and building warrant stage;
 - A lack of expertise at the planning application stage means that the requirement could become a tick box exercise which discounts any value that the exercise may have had.
- 6.11 An Energy Use / Sustainability Assessment that sets out the site and building design approaches taken to reduce greenhouse gas emissions should be more than sufficient with identification of what, if any, additional low and zero-carbon generating technologies will also be considered as appropriate or necessary as part of the development. The detailed assessment of actual levels of reduction that confirms these meet the relevant building standards will then only need to be undertaken at the Building Warrant stage.

7. Conclusions

- 7.1 West Dunbartonshire Council has many challenges to overcome related to its legacy of former heavy industries. The opportunities for new residential neighbourhoods linked to economic and social opportunities are nevertheless significant and ones that the Council is seeking to embrace through the development plan.
- 7.2 Ambition and optimism are always an important part of any spatial strategy but HFS would counsel that these must be measured and any LDP must have a robust evidence base from which it can build.
- 7.3 HFS supports the Council in their endeavours to pursue place-making as a policy priority for the new LDP but flexibility must be an integral part of that to

ensure that viability is not undermined. HFS also supports the Council in deleting undeliverable sites from the emerging LDP but, through the annual review of the HLA, HFS has identified other sites that ought to also be deleted.

- 7.4 The ambition and optimism of the emerging LDP is exemplified by the statement at page 40 of the MIR where it is claimed that the housing land supply situation is “*more than enough to provide a generous housing land requirement*”. However, the analysis that HFS has undertaken would suggest that the land supply situation is in fact carefully balanced between potentially meeting all housing need and demand and not meeting this.
- 7.5 On that basis, HFS would support the allocation of additional land through the emerging LDP. Given that several sites within the Established Land Supply will require support and significant initial investment to allow these to begin to deliver new homes, HFS would suggest that a range of sites in good market locations must be included within the emerging LDP to ensure that all housing need and demand can be met.

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