

Examination of the East Dunbartonshire Local Development Plan

Homes for Scotland response to East Dunbartonshire response to Further Information Request 07

Further Information Request 07: Issue 06 Creating Inclusive and Sustainable Communities / Housing Land Supply.

Homes for Scotland have prepared this response to Further Information Request 07 liaising with Geddes Consulting. The Reporter is aware that Geddes Consulting is responding on behalf of the following members:

- Bellway Homes;
- CALA Homes (West);
- Gladman Developments;
- Hallam Land Management;
- Persimmon Homes;
- Stewart Milne Homes; and
- Taylor Wimpey.

Homes for Scotland endorse and support the comments made by Geddes Consulting. This submission refers to the evidence set out in the response by Geddes Consulting.

Homes for Scotland invites the Reporter to allocate sufficient additional effective housing land to meet the housing land requirement in full and maintain a 5 year effective housing land supply at all times as required by the approved Glasgow & the Clyde Valley Strategic Development Plan (SDP) and Scottish Planning Policy.

Question 1

The Glasgow and the Clyde Valley Strategic Development Plan uses the Planning Scenario / Low Affordability estimate when calculating the indicative housing requirement. The council indicates in Evidence Report 1 that the Local Housing Strategy adopts the alternative High Affordability / Low Growth scenario to the calculation of affordable housing need in the period 2008 to 2020. This reduces the affordable requirement from 6,400 to 5,377 for the period 2008-2020; and, if projected, reduces the affordable housing requirement from 1,200 to 806 for the period 2020 to 2025.

What justification is there to adopt the alternative High Affordability estimate; and is such an approach consistent with the strategic development plan?

The Reporter will note that the Council concludes that “there is therefore no justification to adopt the alternative High Affordability estimate”.

Homes for Scotland agrees that the Proposed Plan should not adopt the alternative High Affordability / Low Growth scenario.

Homes for Scotland disagrees that the approach adopted by the Council as set out in Evidence Report 1 is consistent with the statutory requirements of the approved SDP.

The Reporter will note that there are a number of unresolved issues regarding evidence presented by the Council to justify its variation from the all tenure housing supply targets set out in Schedule 11A.

This is further evidenced in the response by Geddes Consulting on behalf of members.

Given that the rationale presented in Evidence Report 1 is based on the selection of an alternative scenario contrary to the approved SDP, no weight can be attributed to its content.

Homes for Scotland considers the Council's wish to attribute significant weight to the emerging Clydeplan SDP that has not undergone Examination or approval from Scottish Ministers is not appropriate

The Council must meet the requirements set out in the approved SDP and not the emerging Clydeplan SDP.

The Council's response to Further Information Request 07 has not provided a credible case to support the affordable housing supply target being reduced to 1,774 homes, particularly as this represents a significant reduction in 5,826 homes.

In accord with the approved SDP and in the absence of any evidence to support the Council's position, Homes for Scotland suggests that the Reporter to adopt the housing supply targets for the LDP as set out in the approved SDP and in the table below.

	2008/09-20	2020-25	2008/09-25
Private Housing Supply Target	2,700	400	3,100
Affordable Housing Supply Target	6,400	1,200	7,600
All-Tenure Housing Supply Target	9,100	1,600	10,700

Source: Glasgow & the Clyde Valley SDP (2012), Schedule 11A *Indicative All-Tenure Housing Requirement*

Should the Reporter wish to adopt the findings set out in the Local Housing Strategy, Homes for Scotland invites the Reporter to adopt the housing supply targets as set out in the table below.

	2008-20	2020-25	2008-25
Private Housing Supply Target	2,900	400	3,300
Affordable Housing Supply Target	4,800	1,200	6,000
All-Tenure Housing Supply Target	7,700	1,600	9,300

Source: Glasgow & the Clyde Valley SDP (2012) and Local Housing Strategy 2011 -2016

Mark Russell

Homes for Scotland, 5 New Mart Place, Edinburgh, EH14 1RW

m,russell@homesforscotland.com

0131 455 8350

It is not clear how the estimates in the LHS have been sourced from the HNDA or modifications made to a HNDA scenario as set out by the Council in Evidence Report 1.

Further evidence is provided by Geddes Consulting, on behalf of members, in response to Question 1.

Given the significance in differences about the adoption of the appropriate HNDA scenario and the Council's lack of evidence to support this, Homes for Scotland suggests that the Reporter requests further information supporting the choice of HNDA estimates adopted in the LHS in advance of the proposed Hearing.

Question 2

The Housing Minister Margaret Burgess MSP announced in November 2015 a £3 billion investment to deliver 50,000 new affordable homes over the next 5 years in Scotland. Based on available public subsidy, the council's Evidence Report 1 suggests the delivery of 1,774 affordable houses in the period to 2025.

What impact would the pledged investment have on the delivery of affordable housing in East Dunbartonshire? Also, is the figure of 1,774 affordable houses for the period 2009 to 2025 the minimum that could be delivered; and is the figure pessimistic when considering investment and the decade remaining to deliver?

Homes for Scotland note that the Council considers that the scale of investment is actually £300 million.

Homes for Scotland considers that some of the investment allocated to East Dunbartonshire will assist the Council deliver a greater number of affordable homes. Homes for Scotland consider that the adoption of past delivery rates of affordable housing to project likely future delivery as set out in Evidence Report 1.

Evidence Report 1 examined past delivery rates of affordable housing. In Homes for Scotland's opinion, this methodology sets an artificially low affordable housing supply target for the Proposed LDP.

This approach simply becomes self fulfilling and does not seek to meet the agreed housing supply targets as set out in the Local Housing Strategy. Homes for Scotland consider that the Council's approach is the minimum that could be delivered.

Further evidence is provided by Geddes Consulting, on behalf of members, in response to Question 2.

Question 3

Representations from the private sector suggest that there is scope to account for unsubsidised affordable housing in East Dunbartonshire. It is highlighted that the East Dunbartonshire's Strategic Housing Investment Plan 2015-2020 suggests that up to 40% or 1,900 affordable houses could be provided in 5 years without subsidy.

What scale of affordable housing could reasonably be expected over the plan period, and what forms of affordable housing could be expected?

Mark Russell

Homes for Scotland, 5 New Mart Place, Edinburgh, EH14 1RW

m,russell@homesforscotland.com

0131 455 8350

Homes for Scotland consider that it is for the Council to determine the scale of affordable housing to meet and the appropriate affordable housing tenures to adopt. This is explained in SPP. The Council identified the scale of affordable housing to meet in its adopted Local Housing Strategy.

The Council should then prepare an affordable housing policy with supplementary guidance, addressing these matters. It is a plan led matter which cannot be addressed by the house builders on a site by site basis.

The Council's assertion that "extremely limited number of developers offering a significant portion of the units as affordable housing gives weight to the Council's position that to meet the indicative level of affordable housing need set out in the SDP would require the release of significant amounts of land for private housing".

The delivery of the required level of affordable housing is a policy led matter. The Council's continued refusal to meet its affordable housing need on the basis of not exceeding its private housing demand is also considered unreasonable by Homes for Scotland. It is also contrary to the approved SDP.

Homes for Scotland consider that at least 1,900 affordable homes could be provided in 5 years without subsidy as stated by the Reporter as long as additional effective housing land is allocated.

Further evidence is provided by Geddes Consulting, on behalf of members, in response to Question 3.

Question 4

The strategic development plan requires 3,100 private houses in the period 2009 to 2025. There is a requirement for 7,600 affordable houses over the same period. The proposed plan includes an affordable housing quota policy requiring housing proposals of 10 units or more to provide 25% on-site affordable housing.

Omitting any addition for generosity, if allocated land for private housing has a total capacity of 3,100 houses, and the 25% quota policy was applied, would that mean that only 2,325 private houses would be delivered (3,100 private minus 775 affordable)? Or, to deliver 3,100 private houses, should land not be allocated with the capacity for 4,130 if the quota is to be applied (4,130 gives 1,033 affordable leaving 3,097 private)?

Therefore, would the local development plan as proposed provide sufficient private housing to meet the strategic development plan's indicative requirement?

The only agreed evidence before the Reporter that demonstrates whether the Council will meet its housing supply target in full is Evidence Report 2. The Housing land Audit 2014 does not include any programming from proposed allocations in the Proposed LDP.

Therefore, it is not possible to determine whether the Council's proposed development strategy will deliver the housing supply target to be met in accord with SPP.

Mark Russell

Homes for Scotland, 5 New Mart Place, Edinburgh, EH14 1RW

m,russell@homesforscotland.com

0131 455 8350

Providing land for 3,333 private homes does not demonstrate the Proposed LDP is capable of maintaining a 5 year effective housing land supply at all times in accord with the approved SDP and SPP.

Further evidence is provided by Geddes Consulting, on behalf of members, in response to Question 4.

Question 5

Land allocated for housing in Local Plan 2 has been carried forward and shown for housing in the proposed local development plan. In addition, there appears to be a reliance on the established housing land supply meeting the housing need.

Is there confidence that the Local Plan 2 sites continue to be “effective” or can be “capable of becoming effective during the plan period”?

Similarly, is there an expectation that the entire established housing land supply (as shown in the housing land audit 2014 and draft 2015) is “effective” or “capable of becoming effective during the plan period”?

Homes for Scotland consider that the programming of the established housing land supply is identified through the Housing Land Audit process.

Contrary to the Council’s assertion, Homes for Scotland has not agreed Appendix 3.

The Reporter will note that Homes for Scotland members control the majority of these new allocations.

The Council has ignored programming presented by the house builders through Home for Scotland in relation to sites allocated in the Proposed LDP. This is unacceptable.

Geddes Consulting has provided the Reporter with an Updated Housing Land Audit 2015 agreed with Homes for Scotland members. This represents the most up to date and realistic position about the effective land supply to adopt for the Proposed LDP.

The Homes for Scotland considers that the Reporter should refer to this document in the determination of the scale of the effective housing land supply over the relevant plan periods. Further evidence is provided by Geddes Consulting, on behalf of members, in response to Question 5.

Question 6

Scottish Planning Policy (2014) suggests that an allowance for “windfall” development may be taken into account where sufficiently evidenced. The council has referred to appeal decisions and other housing permissions consented in the past year; and suggested that around 10% of the housing need could come forward from windfall.

Using evidence from the past (ideally up to 10 years), what has been the average windfall provided in East Dunbartonshire per year?

Mark Russell
Homes for Scotland, 5 New Mart Place, Edinburgh, EH14 1RW
m,russell@homesforscotland.com

The Council has not provided any evidence to support the assumption that 10% of the housing need could come forward from windfall.

Windfall sites can be both greenfield and brownfield sites. The Proposed LDP requires an appropriate policy mechanism to support development management decisions on windfall sites. An appropriate policy to maintain a 5 year effective housing land supply at all times would assist the delivery of effective housing land.

In the absence of evidence regarding the future trends of windfall sites, Homes for Scotland considers that the Reporter should seek to allocate sufficient effective housing land to meet the all tenure housing supply target in full.

Further evidence is provided by Geddes Consulting, on behalf of members, in response to Question 6.

Question 7

Scottish Planning Policy advises that local development plans should provide for a minimum of 5 years effective housing land supply at all times. Representations have suggested revised policy wording to accommodate this.

Should the following paragraph be inserted into the section headed Development Opportunities in policy 6? Or, should alternative wording be used?

“Where a shortfall in the 5 year effective housing land supply is proven applications incorporating housing will be assessed against the provisions of the local development plan with the exception of the utilisation of brownfield over greenfield land (criterion A of policy 1); and the protection of green belt (policy 3). Proposals should contribute to sustainable development.”

Should criteria A of policy 1 be modified to read as follows: “The utilisation of brownfield over greenfield land unless a 5 year effective housing land supply is not maintained.”

In accord with SPP, where a shortfall in the 5-year effective housing land supply emerges, development plan policies for the supply of housing land will not be considered up to date. These policies include those which restrict the location of land for housing, such as Green Belt.

Further Strategy Support Measure 10 of the approved SDP requires local authorities to maintain a five years' effective housing land supply across all tenures throughout the period to 2020.

Further evidence is provided by Geddes Consulting, on behalf of members, in response to Question 7.

Homes for Scotland supports the recommend policy modifications proposed by Geddes Consulting.

Mark Russell

Homes for Scotland, 5 New Mart Place, Edinburgh, EH14 1RW

m,russell@homesforscotland.com

0131 455 8350

Question 8

Different housing figures have been provided by the council for the plan period in the proposed plan; Evidence Report 1; and the schedule 4 response. The council is requested to populate the table (attached at Annex 2) with a break-down of completions; the established supply that is effective or capable of becoming effective; new proposed allocations; and windfall (taking account of question 6).

Homes for Scotland cannot conclude whether the Council's Annex 2 (Table 4 *Housing Land Supply*) is accurate. Further clarity is required by the Council to assist the LDP Examination. Homes for Scotland suggest that the Council provide this in order to clarify matters.

Homes for Scotland dispute the figures presented as housing supply targets. These housing supply targets are not in accord with the LHS, approved SDP or SPP.

The Local Housing Strategy clearly identifies the housing supply targets as 2,900 homes for private and 4,800 homes for affordable from 2008 to 2020. There is no identification of housing supply targets beyond 2020.

On this basis, Homes for Scotland has provided the Reporter with Annex 2 taking account of the programming presented in the Updated Housing Land Audit, submitted by Geddes Consulting.

This Annex 2 adopts the housing supply targets set out in the LHS.

The outcome of this assessment is set out below:

Annex 2 LHS & SHIP Target with Updated Housing Land Audit 2015			
Period 2009-2020			
	Private housing	Affordable housing	All-tenure
SDP indicative requirement	2,700	6,400	9,100
Housing supply target*	2,900	4,800	7,700
Generosity (10%)	290	480	770
Housing land requirement	3,190	5,280	8,470
Completions	1069	724	1,719
Established supply	1051	303	1354
Projected windfall	140	45	185
LDP allocations	473	393	866
+/- housing supply	-457	-3,815	-4,272
Period 2020-2025			
SDP indicative requirement	400	1,200	1,600
Housing supply target*	400	1,200	1,600
Generosity (10%)	40	120	160
Housing land requirement	440	1,320	1,760
Established supply	249	19	268

Projected windfall	140	45	185
LDP allocations	147	24	171
+/- housing supply	96	-1,232	-1,136
Period 2009-2025			
SDP indicative requirement	3,100	7,600	10,700
Housing supply target*	3,100	6,000	4,874
Generosity (10%)	310	177	487
Housing land requirement	3,410	1,951	5,361
Completions	1069	724	1719
Established supply	1450	362	1812
Projected windfall	280	90	370
LDP allocations	500	387	887
+/- housing supply	-331	-5,037	-5,368

Homes for Scotland considers that the shortfall in the All-Tenure housing land supply is 5,368 homes from 2009 to 2025.

However, should the Reporter determine that the Council's approach to defining housing supply targets is appropriate and in accord with the approved SDP and SPP, the outcome for Annex 2 is as follows:

Annex 2 EDC Proposed LDP Target with Updated Housing Land Audit 2015			
Period 2009-2020			
	Private housing	Affordable housing	All-tenure
SDP indicative requirement	2,700	6,400	9,100
Housing supply target*	2,700	1,220	3,920
Generosity (10%)	270	122	392
Housing land requirement	2,970	1,342	4,312
Completions	1069	724	1,719
Established supply	1051	303	1354
Projected windfall	140	45	185
LDP allocations	473	393	866
+/- housing supply	-237	123	-114
Period 2020-2025			
SDP indicative requirement	400	1,200	1,600
Housing supply target*	400	554	954
Generosity (10%)	40	55	95
Housing land requirement	440	604	1,049
Established supply	249	19	268
Projected windfall	140	45	185
LDP allocations	147	24	171
+/- housing supply	96	-516	-420
Period 2009-2025			

SDP indicative requirement	3,100	7,600	10,700
Housing supply target*	3,100	1,774	4,874
Generosity (10%)	310	177	487
Housing land requirement	3,410	1,951	5,361
Completions	1069	724	1719
Established supply	1300	322	1622
Projected windfall	280	90	370
LDP allocations	620	417	1037
+/- housing supply	-141	-393	-534

The Council's proposed development strategy identifies a shortfall in the housing land supply of 534 homes over the period to 2025.

This does not take account of the private housing target at 2,900 homes as set out in the Local Housing Strategy and the contribution of Housing Land Audit sites to the windfall allowance.

However, the land supply position is in accord with the programming from Homes for Scotland and represents the only realistic and relevant position.

Further evidence is provided by Geddes Consulting, on behalf of members, in response to Question 8.

Homes for Scotland respectively request that the Reporter allocate sufficient housing land to meet the all tenure housing supply target in accord with the approved SDP and SPP.

Question 9

The council indicates changes to the indicative capacities of housing sites. It is not clear from the formatting if the council is indicating deleting units or revising the capacity. For example, "6.2 Land to Rear of Boclair House Pg 59 (Bearsden) – 9 units".

- Does this mean delete 9 units from the 20 indicative capacity or revise the indicative capacity to 9 units?

Homes for Scotland note the Council's comment.

Question 10

The council refers to various decisions made since the publication of the proposed plan including Braes of Yetts; East of Aldessan House; Baldoran House; and a Former Petrol Station in Kirkintilloch.

- The council should provide an update on any planning permissions issued since the publication of the proposed plan and include any decision notices; indicative capacities; and a location plan (to scale) of each site.

- Have the figures presented by the council included these recent decisions? And, how should these permissions inform the examination process and the housing need?

Homes for Scotland note the Council's comment.

Question 11

In relation to housing for agricultural workers, could the council's suggested wording to allow "appropriate replacements of existing dwellings" in the green belt allow derelict or ruinous dwellings to be redeveloped? Should the wording include "appropriate replacements of existing habitable dwellings"?

Homes for Scotland agree with the Council's comment.

Mark Russell
Homes for Scotland, 5 New Mart Place, Edinburgh, EH14 1RW
m,russell@homesforscotland.com
0131 455 8350

