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**NORTH LANARKSHIRE LOCAL DEVELOPMENT PLAN –
PROPOSED PLAN**

17 MARCH 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.

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PROCESS

Homes for Scotland represents members on a wide range of issues affecting their ability to deliver much needed homes.

Our views here have been endorsed by the Strathclyde House Builders Committee and advisory groups utilising the skills and expertise of key representatives drawn from member companies.

NORTH LANARKSHIRE COUNCIL LOCAL DEVELOPMENT PLAN – PROPOSED PLAN

Introduction

Homes for Scotland is grateful for the opportunity to make representations on the North Lanarkshire Local Development Plan Proposed Plan. In this submission we have made some general points as well as providing comments on specific issues and policies.

1. General Comments

- 1.1 Homes for Scotland agrees with the Council's approach to place-making and sustainability and the five principal policies that the Council has outlined. We also note that the proposed spatial strategy places particular emphasis on the continuing regeneration of North Lanarkshire's economy and physical fabric. We agree that the transformation of such places will be vitally important in attracting further inward investment to the area, and in attracting home builders. Achieving this could offer a number of benefits to North Lanarkshire.
- 1.2 Homes for Scotland also notes the Council's long term overall aim to increase sustainable growth and regeneration and improve places. We would not disagree with this aim in principle, but the Council must be mindful of and give careful consideration to fact that the ability of the market to deliver new homes will depend upon opportunities for development being made available in places where people wish to live. This will be crucial to the Council meeting its own aims and objectives.
- 1.3 On housing supply, we have a number of significant concerns with the adequacy to the LDP as presented in the Proposed Plan. There is an absence of detail on key aspects of provision and compliance with Scottish Planning Policy and the current and adopted Clydeplan SDP, particularly relating to planning for housing. The examination process should provide an opportunity to present and scrutinise some of this missing or non-compliant detail, which includes but is not limited to:
- The need to update the evidence place on land supply by referring to the agreed 2015 audit or any more up to date audit agreed between now and the examination process
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 - The need for more detail on the programmed supply, including clear timeframes for when existing and proposed sites are expected to deliver the numbers of homes anticipated.

- The desirability of breaking down the programmed supply by tenure to assist scrutiny of effectiveness and deliverability
- The need to ensure the plan provide at least a 10% generosity allowance across all tenures – not just private supply – to ensure compliance with Scottish Planning Policy
- The need to ensure the plan is compliant with the current and adopted Clydeplan SDP and is not influenced by the emerging replacement SDP.

2. **Specific Comments**

Infrastructure Contributions

- 2.1 There is insufficient detail in this policy as set out on pages 34 and 35 of the Proposed Plan. In our previous submission on the Main Issues Report we pointed out that home builders require certainty and clarity. The policy refers to further detail being provided in supplementary planning guidance. This is disappointing and makes this part of the plan unfit for purpose. The developer contributions that home builders and others can expect to have to pay in different parts of the plan area should be set out clearly in the Proposed Plan so that the correct and proper level of scrutiny can be given during plan preparation, and so development appraisals can accurately reflect the costs of meeting policy requirements. Whilst the Council has stated the policy and contributions will need to comply with Circular 3/2012, it is not possible to confirm at this stage whether or not the plan achieves this. The Council must consider the deliverability of housing land options and allocations and the impact of obligations on the viability of schemes.

Land Supply

- 2.2 Homes for Scotland agrees that a minimum 5 year effective land supply for housing must be maintained at all times. This is a clear requirement on the Council as set out Scottish Planning Policy. Being such an essential component of an plan's success, this should form part of the plan's Principal Policies, not just a subordinate thematic policy. Councils must do all they can to ensure that a five year housing land supply is kept at all times. This includes ensuring sites allocated in plans and audits are effective and can be delivered on the ground when they are needed.
- 2.3 The Council is pursuing an 'alternate rebalanced economy' scenario could, as outlined in the Main Issues Report, which seeks to increase the population by 2,300. Given this context, Homes for Scotland urges the Council to ensure it maintains at least a 5-year effective housing land supply at all times in each of North Lanarkshire's three sub-market housing areas (as well, of course, as across the LDP area as a whole). With that in mind we have identified a

number of sites (please see Appendix 1) that are capable being delivered within the plan period as they are not effective and are not capable of becoming effective within that timeframe.

- 2.4 The Proposed Plan and supporting evidence seeks to set out policies and proposals to achieve North Lanarkshire’s development needs over the next 5-10 years and the Council anticipates an adoption date between November 2018 and February 2019. Early 2019 seems the more realistic adoption date and this would give the LDP a 5-year period of 2019 to 2024 and, looking beyond that, a 10-year period of 2019 to 2029.
- 2.5 The Proposed Plan housing development strategy is summarised in the ‘Promoting housing’ table on page 52, which is in extract below. This indicates a total 214 existing housing sites delivering 16,584 units, and 53 proposed sites delivering 5,435 units, totalling 22,019 units over 267 sites.

Table 1 North Lanarkshire Council – Promoting Housing Table

Area	Existing Sites	Area (Ha)	Capacity	Remaining	Proposed Sites	Area (Ha)	Capacity	Total Sites	Area (Ha)	Capacity
Airdrie	32	58.74	1,222	963	11	68.86	760	43	127.60	1,723
Beltzhill	16	51.18	978	844	4	32.09	802	20	83.27	1,646
Coatbridge	27	93.62	2,099	2,021	7	52.76	1,319	34	146.38	3,340
Cumbernauld/Kilsyth	43	230.80	3,079	2,864	6	17.81	443	49	248.61	3,307
Motherwell	34	263.63	5,256	4,839	2	6.35	158	36	269.98	4,997
Northern Corridor	22	258.86	3,860	3,841	4	9.04	227	26	267.90	4,068
Wishaw	40	63.13	1,440	1,212	19	115.67	1,726	59	178.80	2,938
	214	1,019.96	17,934	16,584	53	302.58	5,435	267	1,322.54	22,019

- 2.6 Although it is not explicitly stated, it is Homes for Scotland’s understanding that the housing table covers the period 2012-2029, with all the existing sites (214 sites, providing 16,584 units) being taken from the Housing Land Audit 2014 and the proposed sites (53 sites providing 5435 units) being new sites which did not feature in the Housing Land Audit 2014.
- 2.7 The Council has provided no detail or evidence on the precise time periods this table is supposed to cover, including the timescales over which the existing and proposed sites are expected to be delivered, or any associated programming for the proposed 267 sites and 22,019 units. Additionally, the Council has used the 2014 Housing Land Audit to help establish the five year effective land supply. This housing land audit is of course already three years old. The evidence base for the plan needs to be as up to date as possible before it can be scrutinised through the examination process in the proper manner. The 2015 Housing Land Audit has now been agreed by the Council but has not yet been published on the Council’s website. We would advise that finalisation and examination of the plan should reflect the most up to date housing land audit which has been agreed with Homes for Scotland. The latest 2015 housing land audit, which is agreed but not yet published, shows a similar shortfall to that indicated in the 2014 version. This is demonstrated in the submission being prepared by Geddes consulting, which has used the 2015 figures as the basis for analysis.

- 2.8 Our analysis of sites, as set out in our Appendix 1, identifies some 26 sites, with an overall capacity of approximately 1,912 units, that we strongly suggest should be excluded from the effective five year land supply for the reasons given in that Appendix. This is a significant number which will have a major impact on the achievement of the housing land requirement and the maintenance of the 5-year supply of effective housing land, and the Council cannot simply ignore this. The Council is duty-bound to ensure it is confident all those sites deemed effective are capable of actually being delivered within the required timescales. A rigorous screening process should be undertaken to weed out those sites that will not deliver within the five year period. We hope our analysis will help in this. The ability for Homes for Scotland, reporters and others to scrutinise and comment on the deliverability of the plan would also be helped by the provision of additional information on the programmed sources of supply (timing, tenure, reasons considered effective, etc).
- 2.9 A further very significant concern is that the Council has Homes for Scotland has referred to the HNDA figures prepared for the emerging new Clydeplan which has yet to be finalised or adopted. This results in non-compliance with the current and adopted Strategic Development Plan. The Council has sought to reduce its annual housing requirement from 1267 in 2008/9-2020 and 1280 in 2020-25 to 1223 for 2012-29. This LDP is required to be consistent with the strategic development plan, and no evidence is presented to justify departing from that.
- 2.10 The Council has not met the Scottish Planning Policy requirement to increase provide a generosity allowance of at least 10% across all tenures. It has only increased the private housing supply target by 10%. As above, SPP confirms that the *“overall housing supply target...should be increased by 10% to 20% to establish the housing land requirement”* (para 116) and this includes both private and affordable sectors. This requirement cannot be met if the affordable part of the anticipated supply is omitted. The Council has provided no justification for not following this aspect of Scottish Planning Policy.
- 2.11 Until the new Clydeplan is approved, the Housing Land Requirement remains as set out in the SDP, plus a (at-minimum)10% generosity allowance, as set out in Table 2 below.

Table 2 Homes for Scotland – All Tenure Housing Requirements

	2008/9 - 2020	2020 - 2025	2008/9 - 2025
All-Tenure Housing Requirement as set in SDP	15,200	6,400	21,600
+ 10% generosity	1,520	640	2,160
All-Tenure Housing Requirement	16,720	7,040	23,760

- 2.12 From the table as set out on page 52 of the Proposed Plan it would appear to Homes for Scotland that the effective land supply totals just 22,019 units. This does not meet the SDP requirement or satisfy the SPP requirements on

generosity. It may be the Council is relying on currently non-effective aspects of the established land supply – however no information has been presented to suggest sites that are currently outwith the effective land supply are expected to become effective in the plan period. In the round – the situation is that there is not a complete evidence base to demonstrate there is sufficient supply of effective land to meet requirements and to maintain an effective five-year land supply throughout the plan period.

- 2.13 Given the above, Homes for Scotland would argue that the Council needs to identify the actual shortfall of land supply based upon the evidence that is presented in the Proposed Plan and associated Background Reports.

Table 3 Homes for Scotland – Shortfall of Housing Land Supply

	2008/9 - 2020	2020 - 2025	2008/9 - 2025
All-Tenure Housing Requirement as set in SDP	15,200	6,400	21,600
+ 10% generosity	1,520	640	2,160
All-Tenure Housing Requirement	16,720	7,040	23,760
less Completions 2008-2014	-4,143	0	-4,143
less Programming 2014-2021	-8,034	-962	-8,996
Remaining All-Tenure Housing Requirement	4,543	6,078	10,621

- 2.14 Based upon the evidence that is presented in the Proposed Plan relating to housing completions and programming in the period 2008/9 to 2020, and the lack of any evidence in relation to programming from effective sites in the 2020-25 period other than the 2020/21 programming provided in the HLA 2014, it can only be concluded that there is a shortfall in the effective land supply of 4,543 units in the period 2008-2020 period, and 6078 units in the 2020-25 period, with a combined shortfall of 10,621 in the 2008-2025 period.
- 2.15 It may be that sites included in the HLA 2014 and new sites not included in the HLA 2014 will deliver additional housing units in the remainder of 2008-20 period and the future 2020-25 period, but there is no evidence as put forward by the Council to substantiate this position. If such sites are to be relied upon as sources of additional supply this should be made clear and programming and reasoning for confidence should be provided.

Conclusions

- 2.16 The housing requirements and provision as set out in the Proposed Plan fail to accord with SPP and the adopted SDP and Scottish Government advice on this matter. We ask that all of the issues outlined above be taken into account and addressed fully before the plan can be adopted. The examination process should provide an opportunity for the council to table the missing detail and amend the issues of non-compliance, and provide Homes for Scotland and other stakeholders and opportunity to assist further with scrutinising this plan.

2.17 To recap on just some of the points we have made:

- The use of housing requirement figures from the HNDA 2 prepared in support of the emerging Clydeplan is directly contrary to the Act which requires city-region LDPs to be in conformity with the adopted SDP. It is essential that this practice is discontinued and a clear statement on this would be very helpful.
- The failure of the Council to justify not applying a generosity allowance to the all-tenure housing land requirement is a significant concern.
- There no evidence of housing delivery programming beyond 2021 in consequence there is a housing land shortfall of 10,621 units in the remaining period to 2025.

2.18 If the suggestions as set out are fully addressed by the Council prior to submitting the plan for examination, the issues set out in this paper should be regarded as unresolved issues to be addressed by the DPEA through the examination process.

Prepared by:

Mark R Russell
Principal Planning Advisor

Contact:

Tammy Adams
Director of Planning
t.adams@homesforscotland.com

Homes for Scotland
5 New Mart Place
Edinburgh
EH14 1RW
Tel: 0131 455 8350
Email: info@homesforscotland.com
Web: www.homesforscotland.com
Twitter: @H_F_S