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*improving living in scotland*



**RESPONSE TO NORTH AYRSHIRE COUNCIL  
LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT**

**23 MARCH 2017**

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## ABOUT HOMES FOR SCOTLAND

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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](http://www.homesforscotland.com) for further information and follow us on twitter @H\_F\_S

## PROCESS

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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 consultation response has been discussed, drafted and approved by the Strathclyde Home Builders' Committee.

# RESPONSE TO NORTH AYRSHIRE COUNCIL'S CONSULTATION ON THE LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT - 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 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
- 1.3 Homes for Scotland welcomes the opportunity to provide input into North Ayrshire Council Local Development Plan.

## 2.0 Detailed Response to Consultation Questions

- 2.1 Homes for Scotland's response to the questions set out in the Main Issues Report (MIR) are set out below. The council's online response form has also been completed, but it is noted the form does not cover all of the questions set out in the MIR and answered below.

### 2.2 Online Survey Questions:

#### Online Survey Question 1

Our Main Issues Report identifies the following key topics as the focus of change for LDP2. Which of the following issues are important to you? Select all that apply.

- A vision for LDP2
- Locality Planning and Place Standard
- **Delivering Houses** ✓
- Town Centres
- Arran and Cumbrae
- Regeneration of Employment Land
- Integrating Marine and Coastal Planning
- Hunterston Port Energy Hub
- Planning for Renewable Energy

Homes for Scotland consider that **delivering homes** is the key issue the Council should focus on. Delivering enough new homes in the right places across North Ayrshire is of critical importance if other desired outcomes are to be achieved, such

as growing the economy, increasing prosperity, delivering jobs and providing a range of homes for those who want access to the property market.

### **Online Survey Question 2**

Do you have any comments on our preferred vision for LDP2?

Homes for Scotland welcomes the fact the Council has placed House Building so high on its preferred options list, and aims to support the commercial house-building industry to build new houses in North Ayrshire. The benefits of achieving this would be considerable, bringing benefits to the area's economy and communities as well as to the home building industry. We wholly support this aspect of the Council's vision.

### **Online Survey Question 3**

Do you have any comments on our preferred and alternative options for ensuring LDP2 supports our approach to locality planning? Do you have any general comments or alternative suggestions we have not mentioned in the Main Issues Report?

We recognise the importance of engaging communities in LDP plan-making. When doing so it is, of course, important to ensure viability of development remains a lead consideration and that communities are advised on this point.

### **Online Survey Question 4**

Do you have any comments on our preferred and alternative options for delivering houses? Do you have any general comments or alternative suggestions we have not mentioned in the Main Issues Report?

Homes for Scotland agrees with the Council's preferred option of setting the Housing Supply Target at a higher level than the housing estimate that was identified in HNDA.

To deliver the number of homes intended, sites identified by the Council must be effective and capable of actually being developed for housing within the required time period. Homes for Scotland will work closely with its members to continue to help scrutinise the housing land supply as the plan progresses and through the housing land audit process.

The green, amber, red traffic light system of assessing suitable sites is a useful tool in helping to ensure that only those sites that can be brought forward and are effective are included as allocations within the Proposed Plan.

Homes for Scotland welcomes the 20% generosity margin applied to the housing supply target to give the housing land requirement, as this will better ensure the housing supply target can be met.

### **Online Survey Questions 5 to 10**

- managing town centres
- Arran and Cumbrae
- regenerating employment land
- integrating marine and coastal planning
- Hunterston Port Energy Hub

Homes for Scotland has no comments to make on these issues

### **Online Survey Question 10**

Do you have any comments on our preferred and alternative options for renewable energy? Do you have any general comments or alternative suggestions we have not mentioned in the Main Issues Report?

The council should ensure any new policies relating to energy do not impose burdens over and above those regulated through building standards. We also request that any consideration being given to district and community heating should be considered at the strategic scale and not applied to individual housing developments as feasibility and viability issues are likely to arise.

### **Online Survey Question 11**

We held a Call for Sites exercise in autumn 2016, allowing anyone to suggest sites for allocation in LDP2. We have conducted an initial constraints assessment of all sites, and these are shown in the Main Issues Report. Details of our assessment can be viewed in the Interim Environmental Report. Do you have any comments on our site selection proposals? Why do you think a particular site would be suitable (or unsuitable) for development? If so, please tell us your views, below. Please ensure you use the site reference in the Main Issues Report to allow us to record your comments.

Homes for Scotland and Council representatives have discussed the sites being considered by the Council, based on the traffic light approach. As stated at the meeting and in response to question 4, Homes for Scotland supports the approach the Council is taking to site selection.

Homes for Scotland member companies may make their own representations on individual sites.

## Online Survey Questions 12

We have conducted an environmental assessment of the Main Issues Report, including a constraints analysis on proposed development sites. Do you have any comments on the Interim Environmental Report.

Homes for Scotland has no comments to make on this.

## Online Survey Question 13

If you identified additional issues in Question 1 that you feel we have not addressed in the Main Issues Report, please add any comments below.

Homes for Scotland have no further comments on this at this time.

### 2.2 Other MIR Questions

2.3 Homes for Scotland would also like to respond to the following questions which are included in the Main Issues Report but not in the Council's online survey form:

#### **MIR QUESTION 5:**

Do you agree that LDP2 should explore options across for stimulating house building across North Ayrshire?

Yes. LDP2 should explore other options for stimulating house building across North Ayrshire. Homes for Scotland welcomes the Council's recognition that home building has many benefits and can act as a positive trigger for future investment within North Ayrshire.

#### **MIR QUESTION 6:**

Do you think the LDP2 should add new land for housing development to replace land that has been identified for housing but that has no prospect of being delivered.

All authorities must maintain an effective five year land supply at all times. This must be based on a credible and sound body of evidence that can be properly scrutinised and that is kept up to date. We agree that the LDP2 should add new land for housing development to any replace land that has been identified as having little or no prospect of coming forward. Any such land should be removed from the effective land supply. This will help ensure that the right land in the right places is allocated, taking account of the Scottish Government emphasis on effectiveness and delivery, so that the housing land supply target can best be met. New housing land should be allocated based on Figure 1 of the MIR, which documents the main market areas of

North Ayrshire. An effective five year supply needs to be reflect market areas that home builders want to and are able to build in.

### **MIR QUESTION 7**

Should we continue to seek developer contributions for example for affordable housing from development?

If Council wants to attract further home builders to North Ayrshire careful consideration needs to be given to whether developer contributions for affordable housing are sought. This and other policy burdens can stifle the home building industry unnecessarily if they are not carefully considered with viability in mind. If the Council is minded to continue to pursue affordable housing planning obligations these must also be based on the tests set out in Circular 3/2012.

If the Council is to pursue affordable housing through developer contributions the Council must ensure that this is clearly expressed and detailed through a policy that is included within the Proposed Plan itself, so this can be properly scrutinised through the consultation and examination process. Reserving this for supplementary guidance would not be acceptable or reasonable and would be contrary to Scottish Government advice.

Other Council's in Scotland have produced flexible policies that provide that where the viability of a housing development is jeopardised by an affordable housing contribution then the Council can consider this accordingly, rather than taking a strict approach regardless of impact on viability and delivery. If North Ayrshire opts to include an affordable housing contribution policy (or any developer contribution policy) then this flexible approach would be advised. It would also be in keeping with Scottish Planning Policy.

Policy or guidance could instruct applicants to provide a development viability statement setting out relevant factors where the financial viability of a development scheme is affected by a requested developer contribution. This would enable reasonable contributions to be pursued without having an undesirable impact on the delivery of new homes.

### **MIR QUESTION 8**

If we allocate additional sites for housing in LDP2 how should we select those sites?

Additional housing sites must be located in areas where housing can viably be delivered. That is within and strong housing market areas as set out in Main Issues Report Figure 1: North Ayrshire Housing Marketability Analysis.

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