

LDISSUE: LDMI17**Housing Targets and Requirements**Name: **John**

02904/FLDP_MIR/3001/003

Comment:

Agree with reducing the housing supply target as proposed in the MIR.

Response:

Comment noted.

Comments 1

Name: **Mr Ian Angus-Felton**

02902/FLDP_MIR/3001/004

Comment:

Impossible to build another 9,600 homes without losing important greenspace. Falkirk is beginning to feel like a small city rather than a town. Most of the housing should be passed to neighbouring council areas to accommodate.

Response:

The Housing Need and Demand Assessment (HNDA), identifies housing need at 418 homes per year. Growth continues to be focused on areas where there is infrastructure capacity to accommodate new development. Whilst the Council seeks to encourage development of brownfield sites, there are a number of greenfield releases to add to the range of effective housing land across the Council area.

Comments 1

Name: **Mr James Ashe**

02761/FLDP_MIR/3001/004

Comment:

Growth has been too great over recent years, particularly in Maddiston/Rumford/Brightons. This has put pressure on the road network, local train station and schools. Need to get more facilities in the area before adding more houses.

Response:

There has been substantial growth across the Council area over the last 30 years, particularly within areas of known marketability. This has impacted on infrastructure capacity such as the local road network and education. The focus on growth within the existing LDP and going forward to LDP2 is to focus growth on areas where there is remaining infrastructure capacity.

Comments 1

Name: **AWG Property**

00906/FLDP_MIR/3002/002

Comment:

The housing supply target should be realistic and ambitious, seeking to deliver growth above the recent 500 unit average rather than lower. A reduced target makes it more important that sites identified are effective and deliverable. The flexibility allowance of 15% is welcomed.

Response:

The housing supply target is set at 450 houses per annum in the Proposed Plan. This is higher than the figure produced by the HNDA, and is considered realistic, given the context of current completion levels, but also infrastructure constraints facing the area. The flexibility allowance has been set at 14% in the Proposed Plan.

Comments 1

Name: **Balfour Beatty Homes**

02702/FLDP_MIR/3002/003

Comment:

Existing allocated sites throughout Falkirk need to be assessed for effectiveness, (otherwise allocating them is a paper exercise) and then supplemented or replaced by more effective sites. The MIR recognises Torwood falls within an area of high demand but existing allocated sites are failing to perform, which says more about the sites than the marketability of the area.

Response:

The effectiveness of sites has been fully assessed through the LDP2 process and is considered annually through the Housing Land Audit (HLA), with the 2016/17 HLA being used for the Proposed Plan.

Comment:

The Housing Supply Target is set too low and is destined to fail due to the existing constrained land supply and the lack of new effective allocations being proposed. A far more ambitious approach is required.

Response:

The housing supply target reflects the HNDA and the projected reduction in the rate of household growth in the area. A flexibility allowance of 14% has been included, which complies with the range required by SPP.

Comments 2

Name: **Mr Will Barclay**

02908/FLDP_MIR/3001/002

Comment:

Agrees with reducing the rate of housing growth.

Response:

Comments noted.

Comments 1

Name: **Cala Homes (West) Ltd**

00512/FLDP_MIR/3002/003

Comment:

It is recommended that the completion rate should be increased to circa 600 units per annum and the flexibility allowance increased to 20%. This would offer some scope for expansion into Hill of Kinnaird East and provide certainty for the Council in delivery of the housing land requirement.

Response:

The housing target is based on the HNDA target. The HNDA has identified a housing need of 418 homes per year, and this has been increased in the Proposed Plan to an annual target of 450 homes per year. The flexibility allowance has been set at 14%.

Comment:

The LDP must prioritise the delivery of the housing land requirement and focus on market areas where demand is greatest and which can be relied upon to deliver new homes. The Council's persistence in relying on larger scale sites which have not and will not deliver even the re-programmed allocations is a mistake.

Response:

The plan seeks to distribute new homes across the Council area, and not concentrate solely on areas which are favoured by the market. This approach will enable most communities to benefit from new growth. A number of LDP1 sites which had stalled due to a variety of factors have been de-allocated in the Proposed Plan.

Comments 2

Name: **Callendar Pharmacy**

02887/FLDP_MIR/3001/004

Comment:

From a business point of view, additional population helps the Town Centre, so a reduced rate of growth is not supported.

Response:

The reduced housing supply target of 450 houses per annum is adopted in the Proposed Plan. This reflects the HNDA and the projections for reduced household growth over the plan period. Nonetheless this remains a substantial level of growth which will assist in achieving the projected population of the area of 170,780 by 2039.

Comments 1

Name: **Ms Kate Christie**

02922/FLDP_MIR/3001/004

Comment:

Agrees with reducing growth rate given pressure on local infrastructure.

Response:

Comment noted. There has been substantial growth across the Council area over the last 30 years, particularly within areas of high market demand. The reduction in the housing supply target reflects the projected reduction in the rate of household growth set out in the Housing Needs and Demand Assessment, but also acknowledges that there are significant infrastructure constraints affecting the area.

Comments 1

Name: **Craigrossie Properties**

00904/FLDP_MIR/3002/003

Comment:

Craigrossie Properties support the preferred approach for maintaining the 25% affordable housing requirement for Braes and Rural South.

Response:

Support noted.

Comment:

Craigrossie Properties do not agree with the preferred option in terms of the housing targets. They consider that the flexibility allowance should be increased to 20% in line with SPP. This would help maintain a 5 year housing land supply.

Response:

The Proposed Plan has applied a 14% flexibility allowance. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030.

Name: **Ms Susan Crook**

02911/FLDP_MIR/3001/002

Comment:

Agrees with reduction in the rate of housing growth.

Response:

Support welcomed.

Comments 1

Name: **Ms Sinead Currie**

02779/FLDP_MIR/3001/003

Comment:

Agree with reduced housing targets and requirements.

Response:

Support noted.

Comments 1

Name: **Mr Douglas Dewar**

02893/FLDP_MIR/3001/003

Comment:

Agree with reducing the rate of growth set out in the housing targets and requirements section.

Response:

Support noted.

Comments 1

Name: **Susan Dyer**

00469/FLDP_MIR/3001/004

Comment:

Reducing the housing targets and requirements doesn't seem wise as there is a national shortage of homes. Will the LDP consider requirements for affordable homes and properly managed rented accommodation?

Response:

The Housing Need and Demand Assessment (HNDA) identifies a housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year over the period 2020-2030. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends: lower household projections and a general slowdown in household formation. LDP2 requires housing developments of 20 units or more to provide affordable housing provision. This is 25% in Larbert, Stenhousemuir, Rural North, Braes and Rural South and 15% elsewhere. Policy HC03 provides further details.

Comments 1

Name: **Mr Tim Flett**

02909/FLDP_MIR/3001/007

Comment:

There is an overreliance on windfall sites.

Response:

The windfall allowance is considered reasonable, and reflects an analysis of past trends.

Comment:

The Housing Land Audit which shows an effective housing land supply cannot deliver 4,025 houses required over 2020-30 as many of the sites are ineffective and stalled.

Response:

The estimated output from existing sites in the Proposed Plan is 4,133. This is derived from the 2016/17 HLA, with further adjustments to take account of constrained sites.

Comment:

Support a more generous flexibility allowance (4.07). 15% is unacceptable and will constrain the delivery of a generous supply of housebuilding for both market and affordable housing.

Response:

The flexibility allowance is 14% in the Proposed Plan, which is within the range of 10-20% specified in SPP. This is considered to be an appropriate level of flexibility for the area.

Comment:

The vision for 2020-2030 is agreed with particularly in relation to housing development. However the distribution of sites across the strategic growth areas and other allocations in the housing market area is not supported.

Response:

New housing allocations reflect areas with capacity for further growth which are also considered marketable locations. Grangemouth is constrained because of the major hazard sites, flooding and its location between the M9, River Carron and the Forth.

Comment:

New allocations in the range of 3,000 units need to be made as part of the LDP2.

Response:

The total allocations contained in the Proposed Plan, amounting to 4,614 units, together with the windfall allowance, provide sufficient housing land to meet the housing land requirement

Comments 5

Name: **Ms Jennifer Forsyth**

02903/FLDP_MIR/3001/004

Comment:

Agree with reduced rate of growth, area has absorbed a tremendous amount of houses and services are under pressure. Focus should move from housebuilding until services are improved.

Response:

Support noted.

Comments 1

Name: **Frank and Birgitta Fortune**

00907/FLDP_MIR/3001/003

Comment:

Reducing the rate of growth is sensible, and focus should be given to revitalising derelict and brownfield areas, rather than allowing building in green field or green belt areas.

Response:

Comment noted. The Proposed Plan seeks to provide a range of sites to meet the housing land requirement. The Proposed Plan includes a number of sites with delivery challenges (often on previously developed land), such as contamination or infrastructure requirements. A full assessment of the effectiveness and deliverability of all sites has been undertaken for the Proposed Plan.

Comments 1

Name: **Garthill Developments Limited**

02710/FLDP_MIR/3002/002

Comment:

Disagrees with reduction in annual housing target to 480 homes. Target should be maintained at 675, or at the very least the flexibility should be increased to 20%. Target should not be based on past housing completions, which are not an accurate indicator of demand or needs but are a reflection of other factors such as over concentration on large sites, lack of smaller sites, insufficient range and choice of deliverable housing sites, and lack of housing output from smaller builders. More sites should be allocated, especially smaller sites such as Slamannan Road, Falkirk, to support local builders.

Response:

The housing supply target has been set at 450 houses per annum in the Proposed Plan. This is an increase on the figure in the HNDA and the reduction in the projected rate of household growth. It is not based on current levels of completions, although current completions do provide some additional evidence that the target is realistic and achievable. The level of flexibility is set at 14%. The Proposed Plan provides a good range of sites, in terms of size, type and location.

Comments 1

Comment:

Gladman are concerned that the HNDA is effectively based on data from a recessionary period, and may not accurately reflect the housing needs and demands arising in the area during a period of economic recovery and growth. The Council should have used figures from the 2014-based household projections (available from January 2017). Whilst this would have led to a degree of delay to LDP2, it would have ensured up-to-date figures and accurate projections. Gladman consider that increasing the range and choice of housing sites available would mean that Falkirk is better able to respond to, and enable, greater economic recovery and growth. Gladman note there there is a reduction in the housing targets beyond LDP1. However, Gladman are pleased that the Council has properly embraced the SPP requirement for the HST to be increased by a margin of generosity, to calculate the HLR and that the Council has justified that figure, although there should be additional allocations beyond those set out in the MIR. A large proportion of the completions in Falkirk have come from large sites, the majority of which will be built out by the time LDP2 is adopted.

Response:

The HNDA identified housing need at 418/yr and we have increased this to a housing target of 450/yr. The flexibility allowance in the Proposed Plan is 14%. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030. The supply gives 25% flexibility from base HNDA figure.

Comment:

It is unfortunate that the overall housing land supply is a reduction from LDP1 and it is questioned whether this approach is the best way for the Council to achieve its Vision. The number of new housing allocations should be increased over and above the MIR to provide a range and choice of sites and ensure Falkirk can meet its growth aspirations.

Response:

The reduction in the housing supply target reflects the HNDA and the projected reduction in the rate of household growth within the area. The growth contained in the Proposed Plan remains substantial, and is commensurate with the Council's vision

Comment:

Concerned that the HNDA is based on data from a recessionary period, and may not reflect the housing needs and demands arising in the area during a period of economic recovery. It is unfortunate that the Council did not wait for the 2014 household projections and produce the HNDA on the basis of these figures.

Response:

The HNDA was dated May 2016 and has been declared robust and credible by the Centre for Housing Market Analysis. The 2014 household projections do not make any significant changes to the 2012 projections used in the HNDA, and in fact the Council's household projections are slightly higher to 2040 than projected in the 2014 figures.

Comment:

The Council must ensure that its housing land requirement is sufficiently generous to allow the identified housing needs to be met.

Response:

Both existing and new allocated sites offer sufficient scale and flexibility of supply to meet the housing targets. In addition should there be a housing shortfall during the plan period, additional sites may be considered where they meet the criteria set out in Policy HC01.

Comments 4

Comment:

Generally the scale and location of housing development should be matched to available infrastructure.

Response:

The comments are noted.

Comments 1

Comment:

Agrees with the reduction in the housing target and not allocating the non-preferred sites.

Response:

Comment noted.

Comments 1

Comment:

The MIR adds a 15% generosity allowance to the housing supply target, however the Scottish Planning Policy allows for an up to 20% allowance to be added. An increase in this flexibility would allow the Council to allocate additional smaller scale sites which are deliverable in the short to medium term in order to complement the larger allocations which have stalled and will now deliver in the longer term.

Response:

The HNDA identified housing need at 418/yr and we have increased this to a housing target of 450/yr as part of the Proposed Plan. The HNDA which the Proposed Plan is based on is dated May 2016 and was declared "robust and credible" by the CHMA (Centre for Housing Market Analysis) which is a division of the Scottish Government. The current flexibility allowance is 14%. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr.

Comments 1

Comment:

In the HLA, only 31 of 149 sites are housebuilder backed. The effective supply is therefore only around 57%. Further allocations are therefore required.

Response:

Of the 144 sites in the original 16/17 HLA 63 sites (44%) are owned by housebuilders or development companies. This accounts for 49% of all units. The remainder are owned by private individuals, the Council and RSL's. The test of effectiveness is not that a site is backed by a housebuilder, but whether it is in the ownership or control of a party which can be expected to develop it or to release it for development.

Comment:

The proposal housing land supply target of 480 units p.a should be increased to 2011 levels of 899 p.a. Information provided by Homes for Scotland shows that completions are far in excess of Council's assumptions. Flexibility allowance should be 30%. The lack of housing land supply means that a policy based on SPP presumption in favour of sustainable development should remain to allow unallocated sites to be considered.

Response:

The Housing Need and Demand Assessment (HNDA), which has 'robust and credible status' from the Scottish Government's Centre for Housing Market Analysis and identified housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends and lower household projections, as well as reflecting current market conditions and infrastructure constraints. The Proposed Plan has applied a 14% flexibility allowance. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030.

Comments 2

Comment:

Mixing affordable housing with private housing will have a negative impact on communities. Nice ideology but in practice this exacerbates existing problems and introduces new problems.

Response:

The Proposed Plan is committed to ensuring mixed communities and continues to seek the provision of a proportion of affordable housing from private housing on sites of 20 units or over.

Comment:

Increased housing will impact on communities, including anti-social behaviour due to the lack of facilities and safe spaces for young children.

Response:

Comment noted.

Comment:

Slower rate of growth is required. Existing communities are struggling to adapt to new housing and existing infrastructure is not sufficient. Suggested increase will require new schools and accompanying facilities to adapt.

Response:

The Proposed Plan contains a reduced housing supply target which reflects the projected reduction in the rate of household growth in the area. So growth will be slower. The Proposed Plan makes provision for infrastructure to meet existing deficiencies and support new growth.

Comments 3

Comment:

The housing supply target derived from the HNDA fails to take into account recent completion trends and there is a disconnect between the HNDA and evidence on the ground. The scenario's used in the HNDA are also questioned, they are too alike and too modest. The Council needs to reconsider the proposed growth strategy and a new rate is proposed of 600 units/yr. There is no justification for the reduction in the generosity allowance from LDP1 and too strong a reliance on existing land supply. A flexibility allowance of 20% should be applied alongside a critical review of the effective housing land supply with a view to identifying additional effective sites. The affordable housing target of 205/yr is high compared to average completions of 109/yr and it is not clear how this will be achieved. Evidence should be provided to indicate funding provision is available for a significant proportion of the target. In the event of a shortfall in funding a proportion of units should be added to the private sector target to ensure the overall housing supply target is met.

Response:

The HNDA has been approved as robust and credible with the scenario used. It is based on National Register of Scotland household projections 2012 which when extrapolated to 2039/40 are slightly higher than the 2014 projections. The population is still continuing to grow albeit at a slightly lower rate and the plan aims to satisfy the projected population and household growth. A review of existing land supply has been undertaken and the current flexibility allowance is 14%. Technical Paper 3 and the LDP recognise that there is scope for the affordable housing element of the target to be met in different ways not all of which will be new build. Any continuation of the buyback scheme would see an equivalent increase in the private sector element of the target reflecting private stock being brought back into the affordable sector. The split between the affordable and private elements of the target is not therefore intended to be prescriptive. It is anticipated at this stage that the buyback policy will continue which at current rates aims to purchase 90 properties per year. The Council's Strategic Housing Investment Programme (SHIP) indicates the funding programme for affordable housing and is updated annually.

Comments 1

Comment:

Housing targets should be reduced as proposed. Any new sites should be on brownfield or town centre sites.

Response:

Comment noted. The Proposed Plan does allocate town centre and brownfield sites for future development. However, greenfield sites are also needed to deliver the scale of housing required over the plan period.

Comments 1

Comment:

Agree with approach in housing targets and requirements.

Response:

Support noted.

Comments 1

Comment:

The preferred option is a pragmatic and sensible approach to meeting housing demands while minimising impacts. It's a more sustainable approach. However I would like to see more consideration to mixed housing type and influence over design to achieve targets within minimal footprint.

Response:

Comment noted.

Comments 1

Comment:

Agree with housing targets and requirements but more could be done by compulsory purchasing existing derelict buildings and renovating them for social housing.

Response:

Compulsory purchase is usually a last resort and has been used rarely and only in specific circumstances where land assembly for projects is impossible. There are other mechanisms for delivering social housing.

Comments 1

Name: **Manor Forrest Ltd**

00455/FLDP_MIR/3003/010

Comment:

The inclusion of an "alternative sites" policy within the emerging plan will play a vital role in ensuring that the Council can (in line with SPP) take such measures to ensure a minimum five year effective supply of housing land.

Response:

Comment noted. Policy HC01 includes this provision.

Comment:

The key to delivering affordable housing is by supporting delivery of mainstream market housing. The threshold of 20 units remains appropriate for the provision of affordable housing. However, a single quote requirement of 15% should be applied.

Response:

Comment noted. LDP2 carries forward LDP1's requirements for affordable housing provision. It is considered appropriate to maintain different quotas for different areas, to reflect different degrees of need.

Comment:

Objects to the decrease in housing land supply target. It will result in a further contraction in the delivery of much-needed housing across the Council area. There should also be no decrease in the flexibility allowance. There are uncertainties surrounding larger sites so a higher flexibility allowance of 20% can be justified.

Response:

The Housing Need and Demand Assessment (HNDA) identifies a housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year over the period 2020-2030. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends: lower household projections and a general slowdown in household formation. This figure, however, is still a very substantial level of housing for the Falkirk Council area. The Proposed Plan has applied a 14% generosity allowance to the housing supply target. This level is within the margin of generosity (10 to 20%) that SPP requires to be added to ensure a generous supply of land.

Comments 3

Name: **I D McSpurtle**

02901/FLDP_MIR/3001/004

Comment:

Housing targets should not be reduced. The number of social houses proposed is too low.

Response:

The housing supply target has been set at 450 houses per annum in the Proposed Plan. This reflects the HNDA and the reduction in the projected rate of household growth.

Comments 1

Name: **Ms Louise Meikleham**

02920/FLDP_MIR/3001/004

Comment:

The affordable housing target should be much higher.

Response:

Comment noted. The housing supply target is based on a detailed assessment of future need and demand for housing in the Council area.

Comments 1

Name: **Miller Homes**

02869/FLDP_MIR/3001/003

Comment:

In relation to affordable housing, the alternative option of relaxing the affordable housing policy should be adopted. Aligning affordable housing requirements with locational need would reflect the five tests in Circular 3/2012 more closely.

Response:

The current affordable housing policy has been carried forward into the Proposed Plan. The HNDA has demonstrated that there is a continuing need for substantial affordable housing in the Falkirk housing market area overall. Relaxing the requirement on individual private sites would make it less likely that the affordable housing target would be met.

Comment:

There are issues with the methodology used by the Council to define the housing supply target. This does not accord with the HNDA and does not provide programming of the established land supply. Analysis shows that there is a considerable shortfall in the scale of new housing allocations required to meet housing land requirements in full. This means that the Council may not be maintaining a 5 year effective housing land supply from the adoption of LDP2.

Response:

The methodology used to define the housing supply target was appropriate and in accordance with Scottish Planning Policy. Allocations have been made in the Proposed Plan to meet the housing land requirement including 14% flexibility.

Name: **MLFP**

02916/FLDP_MIR/3001/003

Comment:

The reduction in the rate of growth is a step in the wrong direction by Falkirk Council, with figures having been generated using older statistical information from 2012. Furthermore larger strategic allocation sites which have not come forward, do not justify a reduction in the numbers of allocation but reflect the sites being unviable to developers. This could be because they are not in an area of current market demand, constrained by infrastructure/contamination issues or even constrained by ownerships/legal issues.

Response:

The HNDA identified housing need at 418/yr and we have increased this to a housing target of 450/yr as part of the Proposed Plan. The HNDA which the Proposed Plan is based on is dated May 2016 and was declared "robust and credible" by the CHMA (Centre for Housing Market Analysis) which is a division of the Scottish Government. A number of sites, including large, strategic sites, have been re-appraised and re-programmed, or removed under the Proposed Plan to ensure continued deliverability.

Comments 1

Name: **Mr Stuart Moss**

02726/FLDP_MIR/3001/004

Comment:

Agree with reducing the rate of growth. Infrastructure needs to be improved before building any more housing.

Response:

Comment noted. The Proposed Plan sets out the key infrastructure projects which are needed to address existing deficiencies and support growth in communities. In addition, developer contributions will continue to play an important role in delivering infrastructure which is required to mitigate the impacts of new development.

Comments 1

Name: **Muirhouses Amenities Association**

00691/FLDP_MIR/3001/003

Comment:

Whilst there is pressure for housing to meet the needs of different sectors of the population, there is also a need to prevent creeping urbanisation and the disappearance of smaller communities on the edge of conurbations. This is a difficult balancing act. In Bo'ness there are existing brownfield sites which were once designated for development and are now lying waste such as Bo'ness Foreshore.

Response:

The Council is required to provide a generous supply of housing land and housing needs cannot be met exclusively on brownfield sites. Effective brownfield opportunities in Bo'ness are limited. The Bo'ness Foreshore site is not considered likely to be deliverable in the plan period due to constraints, high development costs, low marketability and consequent viability issues. Consequently, it has been de-allocated.

Comments 1

Name: **NHS Forth Valley (NHS Board)**

00522/FLDP_MIR/3001/002

Comment:

A more generous housing flexibility target of 20% should be introduced. The current target is pessimistic and will not realise the full potential of the housing market in the Falkirk area.

Response:

The flexibility allowance is 14% in the Proposed Plan. This is within the range of 10-20% specified in SPP, and is considered an appropriate level for the area.

Comment:

Support for the view that there needs to be a focus on sites where there is clear market interest, such as Larbert. There is no point continuing to allocate sites which have failed to deliver housing.

Response:

The plan seeks to distribute new homes across the Council area, and not concentrate solely on areas which are favoured by the market, so most communities can benefit from new growth. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, and are in marketable locations.

Comments 2

Comment:

A more generous level of flexibility (20%) should be adopted, increasing the housing land requirement by 240 homes. A more flexible approach to delivering the affordable housing need would be welcomed provided that the new thresholds were underpinned by strong evidence of need (especially if these are being raised).

Response:

The Proposed Plan has added a 14% generosity allowance to the housing supply target. The 14% generosity allowance is within the margin required by Scottish Planning Policy (10 to 20%) to be added to the housing supply target to establish the housing land requirement. The housing land requirement already includes a housing supply target for affordable homes. This target is based on findings on the Housing Needs and Demand Assessment, which achieved 'robust and credible status' from the Scottish Government's Centre for Housing Market Analysis.

Comment:

Windfall allowance of 500 units over 10 years should be replaced by specific land use allocations over the same period.

Response:

A windfall allowance is permitted by SPP, and reflects the relatively high levels of windfall sites which have historically come forward in the area. The figure of 50 units per year has been justified by an analysis of past trends.

Comment:

Support for an 'alternative sites' policy which is necessary to ensure that a minimum five year effective supply of housing land is maintained.

Response:

Support noted.

Comment:

Given the tight geographical nature of the Council area there is no justification for the two tier quota system for affordable housing. A single quota requirement of 15% should be applied to all qualifying developments.

Response:

The Council continues to adopt a two tier approach to applying its affordable housing requirement. The requirements are set at 15% in lower level areas of need, and 25% in more pressured areas. This reflects real differences in need between the various sub market areas.

Comment:

It is not justifiable for the Council to make a significant decrease in the housing land supply target. The reduced target will lead to a contraction of the delivery of much needed housing. The flexibility allowance should be increased from 15% to 20%. This increase is needed given the uncertainty over timescales for the delivery of some of the larger development sites within the land supply.

Response:

The reduction in the housing land target reflects the HNDA, which takes into account projected reductions in the rate of household growth in the area. The HNDA target is 418 units per year, and the Proposed Plan has set the housing supply target at 450 units. The flexibility allowance has been set at 14% which is considered appropriate and within the range required by SPP.

Comments 5

Comment:

Flexibility allowance should be increased to 20%. This added flexibility will cover uncertainty in the delivery timescales for sites and allow the housing supply target to be met even if there are delays in some sites. There has been a history of under delivery in Falkirk.

Response:

The flexibility allowance is 14% in the Proposed Plan. This is within the range of 10-20% specified in SPP and is considered to be an appropriate level for the area.

Comments 1

Comment:

Affordable housing should be seen in the context of affordable living. If houses are built so far from employment, social and leisure opportunities that they require cars to access these critical facilities, or there is no readily accessible public transport available, then the cost of travel negates the benefits of providing affordable housing. We would urge consideration of the ability to access work and play by active travel means as a key consideration in the location of any housing, but it is a critical component of affordable housing.

Response:

Comment noted. LDP2 identifies the most appropriate land allocations after consideration of many factors, including proximity to public transport, amenities and the path network.

Comments 1

Comment:

Housing target should be significantly greater. The application of a lower flexibility allowance of 15% compared with 17% in LDP1 is not fully justified. This should be increased to 20% given that the deliverability of some sites is questionable. LDP2 needs to address backlog shortfall from LDP1 of 550 units which should be carried forward.

Response:

The housing supply target has been set at 450 houses per annum in the Proposed Plan. This reflects the HNDA and the reduction in the projected rate of household growth. The level of flexibility has been set at 14%.

Comment:

We do not accept that reducing the housing target from 675 to 480 houses a year is sustainable and see no justification for this scale of reduction in supply. We also question the split between market and affordable housing. Achievement of the target will require a significant reliance on private housing sites to meet affordable housing need. Instead we suggest that the Council should adopt an annual housing target of 591 houses a year and apply a 20% flexibility allowance which would create a requirement to identify land for 7092 homes deliverable between 2020-2030. This will give encouragement to the house building sector in the confidence that there is a generous supply of land which will assist in raising completion rates.

Response:

The HNDA identified housing need at 418 units/yr and we have increased this to a housing supply target of 450 units/yr as part of the Proposed Plan. The HNDA which the Proposed Plan is based on is dated May 2016 and was declared "robust and credible" by the CHMA (Centre for Housing Market Analysis). The Proposed Plan has added a 14% generosity allowance to the housing supply target. 14% is within the margin required by Scottish Planning Policy (10 to 20%) to be added to the target to establish the housing land requirement.

Comment:

An annual target of 480 units per annum is not a sustainable target and there is no justification for the proposed reduction in supply. Notwithstanding the average completion rates between 2008-2015, the significant growth in completion rates since 2012/13 suggests that a target of 480 units per annum is unduly pessimistic. There is no justification as to why the 17% flexibility applied in LDP1 has been reduced. The level of flexibility should be a minimum of 20%.

Response:

The Housing Need and Demand Assessment (HNDA) identifies a housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year over the period 2020-2030. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends: lower household growth projections and a general slowdown in household formation. The Proposed Plan has applied a 14% generosity allowance to the housing supply target. This level is within the margin of generosity (10 to 20%) that SPP requires to be added to ensure a generous supply of land.

Comments 3

Comment:

A 15% flexibility allowance is reasonable and appropriate in terms of identifying a sufficiently flexible housing land requirement. Allocations of housing land must be sufficiently flexible to provide a range and choice of housing sites in a range of locations. Relying on a small number of large sites (as is the case in Denny and Dunipace) could restrict housing delivery within the communities.

Response:

The Proposed Plan has added a 14% generosity allowance to the housing supply target. 14% is within the margin required by Scottish Planning Policy (10 to 20%) to be added to the target to establish the housing land requirement. LDP2 has enough housing land allocated, with enough flexibility to meet the housing land requirement and fulfil Scottish Planning Policy requirements.

Comments 1

Comment:

Important that affordable social housing is built. Growth is good but only if there is infrastructure to support it. Housing should be built on brownfield and infill sites, including sub-division of plots and extending properties to support multi-generational living.

Response:

Proposed Plan policy requires new developments of 20 units or over to provide between 15-25% affordable housing, depending on the locality. The Council seeks to support the delivery of housing on brownfield and urban capacity sites through policies in the Proposed Plan, and continues to explore delivery and funding mechanisms such as the Housing Infrastructure Fund to deliver constrained brownfield sites, and new infrastructure to support them.

Comments 1

Comment:

Agree that housing growth targets should be reduced as proposed.

Response:

Comment noted.

Name: **Ms Kathryn Rosevear**

02921/FLDP_MIR/3001/003

Comment:

I fully agree with reducing the housing targets as proposed in the preferred option.

Response:

Support noted.

Name: **Roy Mitchell Design Ltd**

00193/FLDP_MIR/3001/003

Comment:

Existing allocated sites throughout Falkirk need to be assessed for effectiveness, (otherwise allocating them is a paper exercise) and then supplemented or replaced by more effective sites. The MIR recognises Torwood falls within an area of high demand but existing allocated sites are failing to perform, which says more about the sites than the marketability of the area.

Response:

The effectiveness of sites has been fully assessed through the LDP2 process and is considered annually through the Housing Land Audit (HLA), with the 2016/17 HLA being used for the Proposed Plan.

Comment:

The Housing Supply Target is set too low and is destined to fail due to the existing constrained land supply and the lack of new effective allocations being proposed. A far more ambitious approach is required.

Response:

The housing supply target reflects the HNDA and the projected reduction in the rate of household growth in the area. A flexibility allowance of 14% has been included, which complies with the range required by SPP.

Name: **Scotland Fire and Rescue Service**

00331/FLDP_MIR/3002/002

Comment:

The MIR has set a reduced housing supply target of 480 homes per annum. The supply target should remain realistic and ambitious and should seek to deliver growth above the 500 homes average, rather than seek a lower target. The housing supply flexibility of 15% is welcomed, but this could be further increased.

Response:

The Housing Need and Demand Assessment (HNDA) identifies a housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year over the period 2020-2030. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends: lower household projections and a general slowdown in household formation. This figure, however, is still a very substantial level of housing for the Falkirk Council area. The Proposed Plan has applied 14% flexibility allowance. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030 (supply gives 25% flexibility from base HNDA figure).

Name: **Michael & Janice Smith**

02915/FLDP_MIR/3001/001

Comment:

Falkirk has been growing too fast in many areas for the current infrastructure. The nature of the area has changed dramatically in a few years. Consolidation and improvement is now required.

Response:

The Proposed Plan reduces the housing land target, in recognition that the rate of household growth is projected to fall, and also acknowledging that infrastructure is under pressure in many parts of the Council area. The Proposed Plan sets out the key infrastructure projects which are needed to address existing deficiencies and support growth in communities. In addition, developer contributions will continue to play an important role in delivering infrastructure which is required to mitigate the impacts of new development.

Name: **Ms Cathie Smythe**

02889/FLDP_MIR/3001/002

Comment:

Reducing the rate of housing growth is supported.

Response:

Support welcomed.

Name: **Stewart Milne Homes**

00371/FLDP_MIR/3001/004

Comment:

The proposed growth strategy should be revisited and the housing supply target increased accordingly. The proposed flexibility level of 15% is a reduction from LDP1 and should be increased to 20% given the number of constrained sites within the Falkirk Council area.

Response:

The housing supply target has been set at 450 houses per annum in the Proposed Plan. This reflects the HNDA and the reduction in the projected rate of household growth from LDP1. The flexibility allowance is set at 14% which is considered reasonable.

Comments 1

Name: **Taylor Wimpey UK Limited**

00198/FLDP_MIR/3004/004

Comment:

Taylor Wimpey support the preferred option to continue an 'alternative sites' policy. They believe the Council should go further, in order to provide certainty to the development industry about where development may or may not happen in the form of a 'safeguarding/future development site' approach. Where there is a failure in the 5 year supply, these sites could be brought forward. East Lothian and Midlothian have taken this approach.

Response:

Comment noted. The Council consider that Proposed Plan Policy HC01 provides adequate support for sites which could assist in addressing a shortfall in the 5 year supply, and which constitute sustainable development, under the terms of SPP.

Comment:

Windfall sites represent a substantial element of the supply, and in light of questions over where this will come from, Taylor Wimpey support the alternative option in the MIR of making no allowance for windfall sites, unless the number can be supported by robust justification in terms of past completions.

Response:

The housing figures identified in the Proposed Plan include a windfall figure of 50 units per annum. This is based on an analysis of past trends. Section 8 of Technical Report 3: Housing and Settlement Growth Option explains the approach further.

Comment:

The annual housing requirement within the existing LDP is 675 units per annum, whereas the preferred option in the MIR only identifies 552 units per annum. It is not appropriate at a time of market recovery to restrict the annual target to below historical figures. There is concern that the MIR proposed to reduce flexibility allowance from 17% to 15%. Whilst the MIR states that a 'moderate' 15% level is appropriate given the level of uncertainty surrounding larger sites in the supply, this would justify increasing flexibility to 20%.

Response:

The Proposed Plan flexibility allowance is 14%. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030. This is still 25% flexibility from the base HNDA figure.

Comment:

Increase flexibility level to 20%. It does not seem appropriate at a time of recovery to reduce both the annual target and generosity factor.

Response:

The flexibility allowance is 14% in the Proposed Plan. This is within the range of 10-20% specified in SPP and is considered appropriate for the area.

Comment:

Do not support the preferred or alternative options for housing targets and requirements set out in para 4.07. Suggest a different alternative target of 12,000 homes over 2020-2040, with 6,000 in 2020-30, at an average rate of 600 homes per year.

Response:

The revised housing supply target in the Proposed Plan has been set at 450 units per year, with a flexibility allowance of 14%. The reduced target reflects the HNDA and the general reduction in the projected rate of household growth in the area.

Comments 5

Name: **Wallace Land Investments**

00001/FLDP_MIR/3002/007

Comment:

Given the tight geographical nature of the Council area there is no justification for the two tier quota system for affordable housing. A single quota requirement of 15% should be applied to all qualifying developments.

Response:

The Council continues to adopt a two tier approach to applying its affordable housing requirement. The requirements are set at 15% in lower level areas of need, and 25% in more pressured areas. This reflects real differences in need between the various sub market areas.

Comment:

It is not justifiable for the Council to make a significant decrease in the housing land supply target. Given the uncertainty over the delivery of some of the larger development sites the application of a higher flexibility allowance can be justified. A flexibility allowance of 17% should be applied to LDP2.

Response:

The reduction in the housing land target reflects the HNDA, which takes into account projected reductions in the rate of household growth in the area. The HNDA target is 418 units per year, and the Proposed Plan has set the housing supply target at 450 units. The flexibility allowance has been set at 14% which is considered appropriate and within the range required by SPP.

Comment:

Windfall allowance of 500 units over 10 years should be replaced by specific land use allocations over the same period.

Response:

A windfall allowance is permitted by SPP, and reflects the relatively high levels of windfall sites which have historically come forward in the area. The figure of 50 units per year has been justified by an analysis of past trends.

Comments 3

Name: **Mr Edward Wood**

02857/FLDP_MIR/3001/003

Comment:

The flexibility allowance should be raised to 20% to provide a greater range and choice of housing across the Council area.

Response:

The flexibility allowance has been set at 14%, which is considered reasonable and appropriate, and is within the SPP's required range of 10-20%

Comments 1

Name: **Mr Robert Alistair Young**

02192/FLDP_MIR/3003/003

Comment:

Questions the effectiveness of the remaining stalled sites in Figure 4.3 and whether they should still be allocated as part of the housing land supply. MIR does not provide any detail on what period these sites will be 'reprogrammed'.

Response:

A further review of site effectiveness has been carried out and is reflected in the Proposed Plan.

Comment:

The preferred option of applying a 15% flexibility allowance is not supported. The application of this lower flexibility allowance has not been fully justified. A more generous level of 20% is supported.

Response:

The flexibility allowance is 14% in the Proposed Plan. This is within the range of 10-20% specified in SPP and is considered appropriate for the area.

Comments 2

Total no. of comments 85