

By email to: [localdevelopmentplans@south-ayrshire.gov.uk](mailto:localdevelopmentplans@south-ayrshire.gov.uk)

Our ref: A12290767

30 September 2015

Dear Development Plan Team

## **DRAFT SUPPLEMENTARY GUIDANCE – MAINTAINING AN EFFECTIVE LAND SUPPLY**

Thank you for the opportunity to comment on the above draft supplementary guidance. We wish to make the following observations:

The guidance would be clearer if the language used reflected the terminology used in Scottish Planning Policy (SPP) with regards to maintaining a 5-year effective housing land supply.

- On page 2 under the heading ‘What is the Purpose of this SG on new housing?’ the text in the third paragraph should be changed to read as follows: “*The purpose of this SG is to set out the criteria which future applications for planning permission will be determined in the event of there being a shortfall in the 5-year effective housing land supply*”.
- On page 3 the heading of Stage 1 should be amended to read “*STAGE 1: Establish shortfall in the 5-year effective housing land supply*”.
- On page 3, Stage 1, the wording in the first bullet of should be amended to read: “*Agreed deficit in annual housing land audit, indicating there is not sufficient allocated land to maintain a 5-year supply of effective housing land*”.
- The first sentence of the final paragraph on page 4 should be amended to read: “*The most recent housing land audit will inform the Council’s decision as to whether there is a shortfall in the 5-year effective housing land supply*”.

## Additional Comments

- The introduction section of the guidance could be amended to include additional context on the policy principles of SPP on maintaining a 5-year supply of effective housing land and a clearer description of your LDP policy on maintaining and protecting land for housing.
- We are of the view that the third bullet on page 3, Stage 1 should be removed as this should not form part of the process in establishing the 5-year effective housing land supply. Any deficit in land supply should be assessed against the figures contained within your adopted Local Development Plan.
- In the fourth bullet on page 3, Stage 3, it would be helpful to provide further information on how 'effectiveness' is to be demonstrated by applicants. The paragraph could be amended to highlight that further guidance on assessing the effectiveness of sites is contained with PAN 2/2010 'Affordable Housing and Housing Land Audits'.
- The final paragraph of page 4 could be improved by including a table of how the 5 year supply of effective housing land and annual housing target is calculated.
- In finalising this guidance we ask that you work closely with the development and housing industry to reach agreement on how this supplementary guidance will be applied.

I hope these comments are helpful. Please contact me if you would like to discuss them in more detail or arrange a meeting.

Yours sincerely

**Simon Pallant**  
**Senior Planner**