
From:
Sent:
To:
Subject:

[REDACTED]
05 December 2023 08:01
Housebuilding

Dear Sir/ Madam

[REDACTED] I have pleasure in attaching our responses to the 2 above consultations and trust they are of assistance.

Response to CMA on WP for Local Concentrations of Land:

Qu2.1 Yes no. of plots is a reasonable metric and used widely across the housebuilding industry so to that extent has alignment. A sensitivity on tenure split (eg affordable housing) should also be measured to ensure extrapolation of volume to years' duration is more accurately assessed.

Qu4.1 Yes, the investigation, at least in Scotland, ought to align to planning authority's HMAs, a number of which extend across more than one Council area. The data should be readily available to do this, albeit the CMA model would need refined

Qu4.2 Agree with Homes for Scotland response.

Qu4.3 In method 2 why is step 3 a measure used as unrelated to concentrations of housebuilder land banks? Applying steps 1 & 2 seems a reasonable approach.

Qu4.4 Consider the data sample in Scottish & NE England context at least is potentially too restrictive in terms of establishing a valid argument around any land bank concentrations analysis.

Qu5.1 We operate in 3 of the 26 LAs identified for further investigation, being E Dunbartonshire, E Renfrewshire and Moray. Over the period subject of the concentration assessment our housebuilding business has operated successfully in each land and housing market, despite the barrier to supply posed by the operation of the planning system across each authority area (allocated land availability in E Dunbartonshire and E Renfrewshire and occasional viability constraints in Moray). Access to land on-market has assisted business growth in the last 5 year period while speculative long term land promotions are diligently pursued through the emerging LDP review process. Delays in the plan led process created firstly by the late arrival of NPF4 and then the subsequent LDP Regulations has materially hampered the delivery of new housing land allocations in numerous LDPs across Scotland, including E Renfrewshire. For reasons primarily of local politics over the assessment period land supply across E Dunbartonshire has been materially constrained. The delivery of one of our main land interest in this Council area in the last 5 years – an allocated site for housing in the LDP, was firstly refused detailed planning permission by the Council, contrary to officer recommendation, and only granted on appeal after a period of pursuing planning permission which lasted 30 months rather than the programmed 12 months (including S75 period).

Regards,

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[REDACTED]

[REDACTED]