### Proposals for Housing Unit Increases

#### Background

A number of Housebuilders have recently contacted the Planning Service to investigate the potential for changing the housing mix on development sites (most with permission) to ultimately increase the number of housing units. The issue of increasing housing units on sites has also been raised by various parties with the Chief Executive and Director as well as with Councillors. It is therefore essential that the Planning Service is consistent in its approach to this matter particularly with regard to advice being given and the planning application assessment process.

With the above in mind this note has been produced which, sets out what as officers we should be advising developers/agents as well as identifying the various issues and considerations that require to be taken into account. It should be noted that this internal guidance note, is just that and that it should not be circulated out with the Planning Service. The content of the note can obviously be discussed with developers/agents as appropriate.

One key consideration is that proposals that involve an increase in housing units <u>will</u> require to be considered on a case by case basis.

It is important to appreciate that Councillors when considering both the Local Development Plan 2012 and the proposed Local Development Plan 2016 were keen to see exact housing numbers for allocated sites shown because it offered certainty to communities.

### Important General Considerations/Points for Officers

When discussing housing proposals that include an increase in housing units, it is important to stress/consider the following key points:

- Providing exact housing numbers when allocating sites was a key component of both the adopted and emerging Local Development Plan.
- Important to stress the Planning Service appreciates the difficult market conditions and wants to be able to help as much as possible etc etc.
- It is for the Developers/Agents to demonstrate a <u>justification</u> for the changes of house types and numbers of units.
- Planning applications that involve increased housing units will be Departures and the exact route for determination of such applications will be considered on a case by case basis.

## Justification

The onus will be on the applicants/agents to provide a detailed justification that should discuss

- (i) Market considerations/changes
- (ii) Compliance with planning policies (as far as practicable)

## (i) Market Consideration Justification

This part of the justification should address both the general market situation and the specific market considerations for the site. Justification for the house type changes (including numbers/tenure etc) should be provided as well as a detailed breakdown of the house sizes and numbers.

# (ii) Planning Policy Justification

The justification must show compliance with planning policies, particularly in relation to policies concerning siting, design and layout, affordable housing and developer obligations, open space, access, infrastructure provision etc. It is important to stress that acceptance of additional units should <u>not</u> compromise good quality siting/layout/design.

In particular the justification should look at:

- Site coverage comparisons (eg before and after demonstration)
- House mix/tenure breakdown
- Affordable housing in excess of policy has the potential to be more attractive
- Room numbers/floor space comparisons
  eg 8 x 4 bedroomed houses = 32 bedrooms
  11 x 3 bedroomed houses = 33 bedrooms

### Conclusion/Key Points

- 1. Case by case situation.
- 2. Onus is on the Applicants/Agents to justify the proposed changes that should include, market justification, compliance with planning policies and justification in terms of mix/tenure and floorspace/site coverage/number of rooms etc.
- Increased housing numbers over allocations will be treated as departures.
  The significance of any departure will be on a case by case basis and judged by the Planning Service.
- 4. The final advice to be given at pre-application and at time of determination, requires to be agreed with Mairi Stewart, Planning Service Manager, in liaison with respective Team Managers.