

## ANGUS COUNCIL

### INFORMATION REPORT

#### HOUSING LAND AUDIT 2024

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#### ABSTRACT

This report provides information to members in relation to the Angus Housing Land Audit 2024.

#### 1. BACKGROUND

The Housing Land Audit is an annual assessment of the housing land supply position. The audit includes an overview of completions that took place between 1 April 2023 – 31 March 2024 and provides details on the expected housing completions across Angus over the next 10-year period: April 2024 – March 2034.

The housing sites included in the audit are those that are currently under construction; housing sites identified in the Local Development Plan (2016) where development has not yet taken place; and other appropriate opportunity/redevelopment sites which have the potential for housing development.

The audit also includes sites that have been granted planning permission for housing that were not identified within the Local Development Plan, generally called windfall sites in housing terminology, and these include redevelopment, conversion and subdivision of houses and flats. In relation to demolition of existing housing stock and replacement/regeneration with new housing, the audit can only include those sites where the number of new houses is greater than those that have been demolished.

As Members are aware, National Planning Framework 4 (NPF4) was published in February 2023 and introduced significant changes to the development planning system across Scotland. NPF 4 also set a Minimum All-Tenure Housing Land Requirement (MATHLR) for each Local Authority to deliver over a ten-year period. NPF 4 requires this figure to be exceeded within the new Local Development Plans. The Council will set out its new housing land requirement within the forthcoming Local Development Plan.

The MATHLR for Angus is 2,550 housing units, and this is the target that the Council is required to deliver from the adoption of NPF 4 in 2023 to 2033, or until it is replaced by the target in the new Local Development Plan. The 2,550 housing target will reduce each year until it is met in full and the audit will show how many houses have been completed against this target and the remaining housing land supply that is available to meet the outstanding number of houses that require to be built.

Members will also be aware that the new planning legislation requires the Council to set out a delivery pipeline for housing development within the Delivery Programme for the Local Development Plan. The Council, at its meeting on 19<sup>th</sup> December 2024 approved its first Delivery Programme, which sets out this delivery pipeline. This was informed by the Housing Land Audit.

The Housing Land Audit is therefore an important source of information for the monitoring of the housing land supply position in Angus against the MATHLR and for setting out a deliverable housing land pipeline with detailed site programming established over the short (1-3 years), medium (4-7 years) and long term (8-10 years). The approach set out in the Angus Housing Land Audit is fully aligned with NPF4 and the requirements for a delivery pipeline of housing over these periods.

The Housing Land Audit looks at and provides detailed programming for those housing sites, with a capacity of 4 or more units as required by Scottish Government guidance. Smaller sites (1-3 housing units) are therefore only included as a total figure within the Audit. A

programmed supply for small housing sites is also provided in the audit based on the average number of historic housing completions per housing market area, of which there are 4 within Angus (North, South, East and West).

## 2. DRAFT ANGUS HOUSING LAND AUDIT 2024

The [Draft Angus Housing Land Audit 2024](#) was published for consultation on 30<sup>th</sup> August 2024 with a closing date for comments of 27<sup>th</sup> September 2024. The draft audit was subject to consultation with the Scottish Government; Homes for Scotland; Scottish Water; Scottish Environment Protection Agency; Transport Scotland and other Key Agencies. Developers, planning agents and registered social landlords (RSLs) with an identified interest in the development of housing land across Angus were also contacted directly.

The Council received a total of 16 responses to the draft housing land audit from developers and landowners, as well as, from the Housing Division of Scottish Government; Homes for Scotland; and Network Rail. In addition, to responses supporting the draft audit, a number of responses queried the deliverability and status of sites, whilst the remainder suggested alternative programming for sites.

A meeting was held with developers, landowners, planning agents and Homes for Scotland on 8 November 2024 where various issues relating to the next Local Development Plan in Angus; the 2024 housing land audit; the status of housing sites; site programming; and the future approach towards housing land supply in Angus were discussed.

Of particular concern to developers was the availability of housing land across Angus especially in South and West Angus given the next Local Development will not be adopted until 2029/2030. Officers reiterated that the deliverable housing pipeline in the draft audit identified an adequate supply of housing land across Angus to 2034 with additional land potentially available that is currently constrained to supplement the deliverable housing land pipeline.

Developers also raised frustrations in relation to NPF 4 and recent Court and Appeal decisions regarding the implementation of Policy 16 in NPF 4 with criticism of the housing land audit process and methodology. Officers referred to the recent Scottish Government Directorate for Planning and Environmental Appeals (DPEA) decision for the site at [Turbeg West, Forfar](#) in which the Reporter made specific reference to the Angus Housing Land Audit and raised no concerns about the methodology or findings in the audit.

The general consensus from those in attendance was that the meeting was helpful in clarifying a number of issues and in raising some concerns about housing across Angus in terms of the future supply and delivery of new homes. It was agreed by all parties that everyone needs to work together for the benefit of future housing delivery across Angus and to ensure the current housing crisis is redressed.

There was agreement that meetings of this nature should be a regular occurrence to discuss the delivery of housing in Angus, particularly in relation to the emerging new Local Development Plan, as collaboration and joint-working with house builders and the industry is recognised as a key component in the preparation of the next development plan. As part of this collaboration, stakeholder engagement on the draft Housing chapter for the Evidence Report is anticipated to start in early 2025.

As a result of the consultation and meeting held on 8 November, a number of changes will be made to the site programming schedule for the Finalised Audit, including programming being pushed back for a number of sites where delivery has been slower than previously anticipated or where new evidence has emerged indicating delivery of sites has been delayed since publication of the draft audit. Programming will also be brought forward where new developers have taken on the sites and completions are now expected to take place earlier than previously anticipated. Changes to the site programming schedule in the deliverable housing pipeline have been made in such a way as to ensure that the overall projections for new completions remain realistic and deliverable.

The draft Housing Land Audit was agreed with Homes for Scotland in December 2024. Work has recently been completed to [finalise the 2024 Housing Land Audit](#) and this has now been published on the Councils website and key stakeholders notified of its publication.

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