



PEGASUS CONSULTANCY

**Representation to Proposed (Edinburgh) City Plan 2030
Supporting Document & Appendices**

On behalf of Inverdunning (Hatton Mains) Ltd

December 2021



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Background

Inverdunning (Hatton Mains) Ltd are responding to the consultation period for City of Edinburgh Council's Proposed City Plan 2030 (Proposed Local Development Plan). This follows an initial representation to the Council's Choices for City Plan 2030 (Main Issues Report) submitted in March 2020.

The previous representation addressed the key 'Choices' set out by the Council at that stage and detailed an opportunity for creation of a new sustainable community at Hatton Village, located on the A71 in West Edinburgh. This included a full Environmental Impact Assessment of the proposal with supporting technical assessments and indicative masterplan and delivery documents.

The representation set out in this document provides a summary of the representation provided to the Consultation process with Annex 1 detailing the specific changes and justification to support the online portal submission.

Appendix 1 provides the Proposed City Plan Site Assessment. Appendices 2 and 3 provide documents in support of the proposed Hatton Village.

We would be happy to answer any queries on the proposal that may arise as representations are assessed by the Council.

Summary

City of Edinburgh Council Planning officials have faced significant challenges in preparing the new City Plan 2030. Changes at national planning level, Covid restrictions and the wider climate change emergency have all placed pressure on setting out a plan which can deliver sustainable growth for Scotland's capital city over the next decade and beyond.

The Choices for City Plan document (LDP Main Issues Report) put forward alternative growth options and asked stakeholders to choose from urban only growth, greenfield expansion options or a combination of both to create the right type of places for the future. This was also reflected in the first stage of the West Edinburgh Study which highlighted potential new sustainable community options as a bold and innovative approach to future growth within a constrained city boundary.

Unfortunately, the Proposed City Plan 2030 does not deliver these promises. The development strategy to meet the needs of a growing population is based upon redevelopment of a range of sites within the city, the majority of which are not available or deliverable within the plan period. Whilst the need for higher density, walkable communities based on public transport, active travel and cutting travel requirements is all supported, the choice of sites for housing will not be sufficient to deliver the plan's aims and objectives of tackling poverty and inequality and creating a vibrant, connected sustainable city.

City Plan 2030 proposes to meet less than half of affordable housing demand and while existing strategic development areas at the Waterfront, South-East Edinburgh and West Edinburgh will contribute to the City's needs over the coming decades, there is a lack of deliverability across a large proportion of the proposed housing allocations. Of the new sites, which theoretically provide for 25,000 homes, only around a third of this capacity (8,000 homes) is realistically deliverable in the plan period. Sites for over 7,000 homes are currently occupied by existing business who have voiced their opposition to plans to relocate them, resulting in likely lengthy CPO requirements. Half of these active business sites are in multiple ownership. Land proposed for over 10,000 homes will not be available in the plan period or cannot be phased in the timescale (with over 11,000 flats planned for the Airport/Gogar area). There is an estimated shortfall of between 12,000 homes (if using the Council's demand figures put forward to NPF4) and 30,000 homes (if increasing affordable targets).

New sustainable communities are required to augment the supply which can be developed as exemplar new settlements and the proposal at Hatton Village is a deliverable proposition.

Annex 1 - Proposed City Plan 2030 – Proposed Changes and Justification

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| Proposed City Plan 2030 Section | Part 1 – Introduction |
| Support? | No (part) |
| Proposed Changes? | <p>1.4 – amend line 2: “We are committed to building 20,000 affordable and low-cost homes over the next 10 years <u>City Plan 2030 will allow for affordable homes targets to be increased to address the significant level of assessed demand, which will include a higher contribution via new mixed tenure housing land allocations.</u>”</p> <p>1.5 – extend line 1: “To meet our objectives, the future growth of our city must meet our ambitions to be a climate ready city where new homes are built to the highest emissions quality standards in resilient, connected neighbourhoods, in the right locations, with the right infrastructure <u>including new sustainable communities.</u>”</p> |
| Reasons for Changes? | <p>1.4</p> <p>The proposed plan meets less than half of the net HNDA2 affordable demand between 2021-32 (17,352 homes net target versus 42,929 homes demand). The affordable target is based on Council commitment to 20,000 affordable completions by 2027 plus a notional annual allowance to 2032 but there is scope for increased supply through affordable housing policy (at 35%) on additional mixed-tenure sites. This requires an increased overall Housing Land Requirement as detailed further within this response (to the Housing Technical Note). The importance of delivering affordable homes is stated throughout City Plan 2030 with associated objectives of addressing poverty and inequality throughout the city. To provide for less than half of affordable demand as the strategy from the outset will only exacerbate the main issues the Council are trying to address. Affordable delivery can be via private housebuilders through range of unsubsidised tenures so it not reliant on capacity of Council or RSL build programmes or grant funding.</p> |

1.5

The City Plan 2030 focus is on brownfield development. Whilst the application of increasing urban density to support walkable neighbourhoods and public transport is fully appreciated as good planning and urban design practice, the reality is that Edinburgh cannot deliver its housing targets based on this approach alone. As detailed further within this response, the proposed housing allocations will not provide a range of sites or sufficient land to meet housing targets in the plan period, contrary to Scottish Planning Policy (para.119). New sustainable communities should form part of the plan strategy as supported by Scottish Planning Policy paragraph 53. This formed one of the options of the West Edinburgh Study (Stage 1, October 2020) with 'New City Districts' to be created as *"bold, affordable, green extensions of the City...designed as low carbon new towns from the outset, focused around sustainable local neighbourhoods with fast links into the City Centre and beyond"*. This approach also assisted with delivery of Public Transport Strategic Corridor routes identified in Council's Mobility Plan and is supported by the Edinburgh Strategic Sustainable Transport Study. This approach is detailed further within this response.

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| Proposed City Plan 2030 Section | Part 2 - Strategy |
| Support? | No (part) |
| Proposed Changes? | <p>City Plan 2030 Aims</p> <ul style="list-style-type: none"> • 2.2 (2) – Amend line 1: “Directing new development to brownfield land <u>and a limited number of greenfield new sustainable community locations</u>” ... • Map 1 (City Plan Spatial Strategy Illustrative) – Amend to identify new sustainable communities to include the proposed site at Hatton Village adjoining the A71 Strategic Active Travel Project. • Map 2 (City Plan Spatial Strategy Technical) – changes as noted for Map 1. <p>Outcome 1 - A sustainable city which supports everyone’s physical and mental wellbeing</p> <ul style="list-style-type: none"> • 2.59 – Amend line 2: “The boundaries of the green belt shown on the Proposals Map are largely unchanged from previous local plans, with no new areas of green belt proposed for development in City Plan over those already set out in the Edinburgh Local Development Plan 2016, though amendment may need to be made if the Scottish Ministers grant planning permission in principle for the proposed development at Land East of Milburn Tower are amended from the 2016 Local Development Plan to reflect the need for new sustainable communities”. • Map 5 (Edinburgh’s Green Belt Boundary) – amend Green Belt boundary to reflect new sustainable community at Hatton Village. • 2.85 – Amend line 1: delete “To achieve this, City Plan seeks to improve air quality in the City, reducing emissions by promoting a |

~~brownfield~~ an approach based upon, 20-minute neighbourhoods, a modal shift away from private car travel, supporting zero carbon energy schemes, and by increasing the City's capacity for air purification through its green infrastructure proposals.

Outcome 2 - A city in which everyone lives in a home which they can afford

- 2.88 – Extend line 2: “The City Plan spatial strategy prioritises new homes on brownfield land and redevelopment of existing areas. in addition to a limited number of identified new sustainable communities”.
- Map 7 (Housing Allocations) – amend plan to identify Hatton Village site as new housing-led development.
- 2.100 – Add line at end: “However, the plan seeks to address an increased proportion of affordable demand by allocating sufficient land for mixed-tenure housing subject to the associated affordable housing policy.”
- 2.101 – Amend line 2: “The affordable housing supply target set out will ~~meet~~ exceed the 2017 Council commitment ~~in full and acknowledges that affordable housing will continue to be delivered beyond 2027~~ and ensure identified demand is more fully addressed.”
- 2.103 – Amend: “The rate at which housing sites are developed is constrained by a variety of factors including market conditions. In order to ensure that a generous supply of land for housing is provided, SPP states that the Housing Supply Target should be increased by a margin of 10 to 20%, depending on local circumstances to establish the housing land requirement. However, the Proposed National Planning Framework 4 proposes 25% generosity allowances for urban areas including Edinburgh and this is reflected in the Proposed City Plan 2030. #

~~is acknowledged that the spatial strategy may require higher levels of intervention than might be the norm. The Council has also acknowledged that using CPO to facilitate development may be needed. A generosity allowance of 20% has been applied to the housing supply target. This reflects the brownfield strategy and its inherent risks.~~

- Page 28 Table (City Plan Housing Land Requirement): **Options 1 and 2, as set out in response to Housing Technical Note.**
- Page 29 Table (Housing Land Supply): **Options 1 and 2, as set out in response to Housing Technical Note.**
- 2.109 – Amend last line: “Sites located partly or wholly in the Green Belt or Countryside must deliver a density of dwellings of ~~at least 65 dwellings per hectare.~~ appropriate to site context with a mix of higher and lower density to reflect appropriate urban design principles”.
- 2.110 – Amend line 1: “To support delivery of a mixed brownfield and sustainable greenfield site approach and provide the right type and number of homes that we want requires everyone to work together proactively.

Outcome 3 - A city where you don't need to own a car to move around

- 2.112 – Amend line 1: “City Plan's spatial strategy directs growth to brownfield sites within the urban area or in strategic expansion areas or new sustainable community locations where there is good public transport, including tram and express bus service.”

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| | <ul style="list-style-type: none"> • Map 8 (Transport Proposals and Safeguards) – add line on A71 noting Public Transport Proposal – Bus Improvements, reflecting same route as identified Strategic Active Travel project. <p>Outcome 4 - A city where everyone shares in its economic success</p> <ul style="list-style-type: none"> • Map 11 (Retail Centres) – add a Proposed New Local Centre at Hatton Village. |
| <p>Reasons for Changes?</p> | <p>The proposed changes reflect findings of the assessment of demand supply provided in response to the Housing Technical Note. The response puts forward options for amending the Housing Land Requirement to allow for an increased proportion of affordable demand to be met. The need to be realistic with what can be delivered is appreciated and the first option therefore sets out a deliverable approach whilst the second option is the minimum requirement. Whilst the City Plan is being prepared in a period of flux in terms of national policy changes, there is a need to ensure the approach taken reflects a positive view on delivering the homes that people need.</p> <p>The assessment of housing land set out in the response to the Housing Technical Note indicates that additional housing land allocations will be required to meet targets. The aims of the plan to focus on brownfield land are noted and appreciated but, a) the demand side figures will require to be adjusted upwards, and, b) the supply side figures do not meet the necessary level so sites outwith the current settlement boundary will be required to be allocated. As noted by the Council in the Choices for City Plan (Main Issues Report) document, there are options for sustainable greenfield development. Whilst several of the options put forward as alternatives by the Council at that stage were not suitable in terms of scale and likely deliverability within the City Plan period, there are other options which have been put forward to the Council. The Inverdunning proposal for a new sustainable community at Hatton Village were outlined in representations to the Choices document which</p> |

also provided an analysis of alternative greenfield locations at that time. The proposed changes to these sections reflect the need for the City Plan to incorporate suitable greenfield sites to allow for growth.

A summary of the case for Hatton Village and how it meets City Plan aspirations for 20 minute new neighbourhoods with strong public transport linkage is outlined in the supporting document.

The proposed density requirements for new greenfield sites coming through the planning system is too restrictive and will not produce the quality of residential environment required in certain locations. Whilst there should be a general objective of increasing densities to maximise public transport and amenities, urban/rural edge sites should reflect their location and a suitable approach to urban design principles and placemaking. This was fully addressed in Pages 8-11 of the representation to to the Choices document (copy re-attached to supporting document).

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| Proposed City Plan 2030 Section | Part 3 - Policies |
| Support? | No (part) |
| Proposed Changes? | <ul style="list-style-type: none"> • Place 3 – Astley Ainslie – delete • Place 5 – Royal Victoria Hospital – delete including H31 reference on Map 21 (subject to outcome of Scottish Government and City of Edinburgh Council discussion on funding of new Gaelic Secondary School) • Map 22 – replace H41 and H46 references with “Place 8” • Map 23 – replace H41, H43, H44, H45, H46, H47, H48 and H49 references with “Places 9-14” • Map 29 – replace H71, H77 and H78 references with “Place 25” • Map 29 – reduce size of H80 to Council-owned land, add “Place 28” reference and replace H81 reference with “Place 29” • Place 30 – Redford Barracks – delete • Place 31 – Edinburgh BioQuarter – amend Development Principles, 2nd para. “A mix of uses focused around the BioQuarter’s role as a life sciences quarter, including around 2500 residential units (<u>1,000 within City Plan 2030 period</u>), community facilities, commercial and leisure to encourage evening and weekend activity.” • Environment Policy Env26 (Housing Density). Delete 3rd para: “Housing proposals which come forward through Policy Hou 4 – Housing Land Supply must deliver a density of dwellings of at least 65 dwellings per hectare as averaged across the overall site’s residential developable area (this should be inclusive of open space but excluding other non-residential uses).” • Housing Policy Hou1 (Housing Development), para.3.190, Amend: |

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| | <p>“Place Policies and Development Principles (and technical requirements in Appendix D) set out the key elements to be delivered on allocated housing sites <u>and on potential windfall sites during the plan period.</u>”</p> |
| <p>Reasons for Changes?</p> | <p>The assessment of proposed housing allocations is set out in the response to the Housing Technical Note. In terms of the Place-based approach taken by City Plan 2030, the general principles are accepted but this should remain as a guide for certain areas rather than specifically linked to proposed allocations. In areas where proposed sites are only potential windfall opportunities, the Place Policies and Development Principles can be retained as development guidance.</p> <p>Of the 95 sites allocated for housing, 54 sites are potential windfall only with no commitment to housing. Indeed, in response to enquiries directly with site owners, there was significant opposition to having to sell and relocate existing business. As such, the identified sites should be removed from specific references. The sites are detailed further in the response to housing proposals.</p> <p>There are two sites that have been confirmed as not available in the plan period; Astley Ainslie Hospital where the disposal process is on hold and Redford Barracks where disposal has been postponed until 2029. A further site at the Royal Victoria Hospital has been shortlisted as the site for a new gaelic secondary school and appear likely to be not available for housing.</p> <p>Whilst there are no references to housing numbers in the Place policies for West Edinburgh, there is a reference for the Edinburgh BioQuarter site which requires to be reduced in terms of deliverability within the plan period. This is detailed further in response to housing proposals.</p> <p>The minimum density of 65dph is addressed in the response to Strategy.</p> |

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| Proposed City Plan 2030 Section | Part 4 - Proposals |
| Support? | No (part) |
| Proposed Changes ? | <p>Table 1 (Environment Proposals) – additions:</p> <ul style="list-style-type: none"> • New Park at Hatton Village (Large Standard) • New Allotments at Hatton Village • Strategic SUDS at Hatton Village <p>Table 2 (Housing Proposals)</p> <ul style="list-style-type: none"> • Delete following proposals as sites constitute potential windfall opportunities only: H1, H2, H3, H4, H5, H6, H7, H9, H11, H14, H17, H18, H20, H21(part), H22, H23, H24, H25, H26, H27, H28(part), H30, H32(part), H35, H36, H37, H38, H41(part), H43, H44, H45, H46, H47, H48, H49, H50, H51, H53, H54, H55(part), H56, H57, H58, H60, H64, H66, H67, H69, H70, H71, H73, H74, H75, H77, H78, H80(part), H81, H87, H90, H94, H95 • Delete following proposals as sites not available during plan period: H8, H31, H85 • Site H13 requires clarification from CEC for inclusion • Amend unit numbers on following sites as reduced site area: H21, H28, H32, H41, H55, H80 • Amend unit numbers on following sites as not wholly deliverable within plan period: H61, H63, H86 <p>Table 4 (Active Travel Proposals) – additions:</p> <ul style="list-style-type: none"> • New Mobility Hub at Hatton Village <p>Table 6 (Improved Bus Connections) – additions:</p> <ul style="list-style-type: none"> • A71 Corridor Express Route/Rapid Bus Transit (Livingston South to City Centre) |

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| | <p>Table 11 (Education Infrastructure) – additions:</p> <ul style="list-style-type: none"> • New Primary School Site/Community Hub reserved at Hatton Village <p>Table 14 (Network of Centres) – additions:</p> <ul style="list-style-type: none"> • Proposed new Local Centre/Hub at Hatton Village |
| <p>Reasons for Changes ?</p> | <p>Proposed amendments to Tables 1, 4, 6, 11 and 14 reflect the additions that would be delivered via the proposed new Hatton Village site in West Edinburgh. This is addressed via the supporting document.</p> <p>Proposed amendments to Table 2 reflect a detailed assessment of proposed housing allocations, as noted in the response to the Housing Technical Note. The justification for the proposed changes is as follows:</p> <p>The sites identified as potential windfall sites should not form specific housing proposals. The Council have not made contact with site owners – this exercise has been undertaken by Pegasus and initial responses indicate a strong opposition to releasing sites from existing business use. The use of CPO powers have been identified by the Council as a possible solution but the timescale and resource required for this approach is clearly not deliverable within the City Plan period. The supporting document lists all sites; there are 54 sites which should be wholly deleted and a further 6 sites reduced in size/capacity to reflect land ownership control (sites which are in public ownership being deemed to be deliverable). Of the total allocated site capacity (24,938) put forward by City Plan 2030, these potential windfall sites account for around 6,400 units or 26% of the total. A general windfall allowance would allow for a proportion of these sites to come forward but it is noted that none of the identified sites are in any way committed for housing. The urban capacity study undertaken for the current adopted LDP (2016) noted that only sites with high probability for housing were included in the potential windfall allowance. It is not apparent that any of the identified windfall sites in City Plan 2030 have a high probability and could only be considered as having potential, subject to landowner decisions.</p> |

Sites not available in the plan period include Site H8 (Astley Ainslie) which is not being disposed of by the NHS with plans on hold and no certainty the site will come forward for housing in the plan period. At best, this is a potential windfall site. H31 (Royal Victoria Hospital) is shortlisted as a site for a new Gaelic secondary school and will not be available for housing if plans progress. H85 (Redford Barracks) is not being disposed of by the MoD until 2029 at the earliest and is therefore not available for housing. All should be removed.

Site H13 (Gillespie Crescent) is currently sheltered housing owned by Viewpoint Housing Association. No confirmation has been provided at this stage by either the Council or Housing Association as to future plans so this requires clarification.

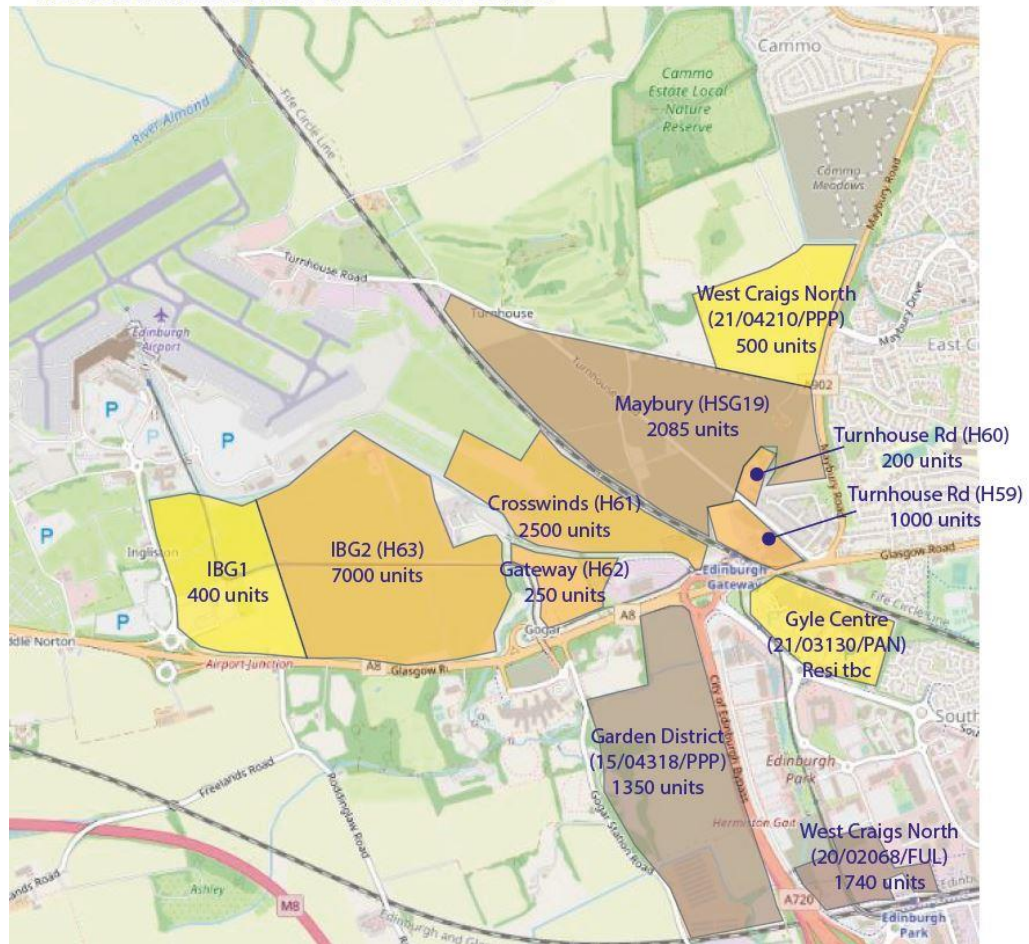
Sites H21, H28, H32, H41, H55, H80 require to be **reduced areas with amended capacities**. H21 (East London Street) is part-owned by Lothian Buses which may come forward but part-owned by a mosque with no confirmation of disposal. H28 (Cowan's Close) is part-owned by the Council and part-owned by a retail unit owner with no confirmation of disposal. H32 (Crewe Road South) is part-owned by Police Scotland which is understood to be a planned disposal but the remainder of site is in two further ownerships- Royal Mail and a private owner with no confirmation of disposal and therefore a potential windfall opportunity at best. H41 (Jane Street) is a large area with multiple ownership – a proportion of the site is owned by the Council and should be retained but the balance of the site should be removed as an allocation. H55 (Seafield) is large site with multiple ownership – part is owned by Lothian Buses and potentially could come forward in plan period but the remainder is owned by a range of investment companies, private owners and car dealerships so disposal timescales are unknown A development brief for wider redevelopment can be provided but only part should form an allocation if supported by Lothian Buses. H80 (Murrayburn Road) is part-owned by the Council but there are also two private landowners with no confirmation of disposal.

H61, H63, H86 are **sites which are not being wholly deliverable within plan period**. H86 (Edinburgh BioQuarter) is allocated for 2,500 units - given the planning and construction lead-in times for a high density proposal of this nature, it is unlikely completions will be achieved until 2024/25 at the earliest. This would allow c.5 years of completions from the site and c.150-200pa is considered maximum achievable output which would equate to around 1,000 units in the City Plan period.

H61 (Crosswinds) is allocated for 2,500 units and there is currently a live planning appeal. H63 (Edinburgh 205/IBG2) is allocated for 7,000 units. Combined with H59 (Turnhouse Road, 1000 units), H60 (Turnhouse Road industrial, 200 units), H62 (Land adjacent Edinburgh Gateway, 250 units) and IBG1 (pending mixed-use application including 400 units), this amounts to 11,350 units proposed for 'West Edinburgh'.

Proposals (as outlined in the Crosswinds appeal, IBG1 application and Edinburgh 205/IBG2 promotional material) all illustrate high density 5-10 storey flatted development. The implementation of over **11,000 flats in the vicinity of the Airport/Gogar Roundabout** will be in addition to 2,085 units (houses/flats) at the existing Maybury allocation HSG19 immediately to the north, 1,350 units (650 houses/700 flats) at the Garden District site immediately to the south (Section 75 now approved) and 1,737 units (flats) at the existing Edinburgh Park mixed-use site Del4. There are also a further 500 units proposed via a current application at West Craigs North and redevelopment of the Gyle Centre to include flatted development currently the subject to community consultation. The result is **over 17,000 homes proposed which will feed into the Gogar Roundabout/Maybury junction** (as illustrated on plan below).

WEST EDINBURGH RESIDENTIAL DEVELOPMENT PROPOSALS



Taking the proposed **West Edinburgh** sites alone, allowing for planning (masterplanning), construction and infrastructure (including new Secondary School and 4 new Primary Schools) lead-in times, completions may be achievable by 2024/25. This would provide c.5 years for the sites to contribute and given the housing product would be high density flatted development, it would require developers to build and sell significant numbers of a similar product per annum. It is considered that the three main sites (H59, H61 and H63) could contribute 1,000 units each at most; this would require completions in the region of 200pa on each site and 600+ pa across the West Edinburgh site (not including H60 and H62). Associated capacities for H61 and H63 should be reduced.

Site 61 sets out proposed phasing in the Design Statement supporting planning application ref.20/03219/PPP which notes up to 358 residential units in Phase 1 (Years 1-6) and a further 822 residential units in Phase 2 (Years 7-16). In this respect, 1000 units as a contribution to City Plan 2030 would still be generous.

Site H63 is allocated for 7,000 units on a 72 hectare gross site (averaging 97dph across the whole site). The IBG1 site proposal provides for 211,511 m² of mixed-use space on a 36.7 hectare site (of which 43,576m² is for residential, equating to 396 flats at an average 110m²). Based upon a similar masterplan approach (high density flats with surrounding open space), this equates to 5,762 m² of floorspace per hectare. Whilst an approximate density guide, if applying this rate to H63, this would provide for 415,000 m² of floorspace. This equates to around 4,000 flats at an average of 100m². This indicates that either the H63 site would require to be significantly higher density to achieve 7,000 units (notwithstanding the site is within an Area of Economic Importance and a significant amount of floorspace should be for commercial uses) or the number is incorrect. Given that there is no current planning application for this site and the need for a new local centre to create a 20 minute neighbourhood, the proposed amendment from 7,000 to 1,000 units in the City Plan 2030 period also appears much more realistic.

As a **comparison of deliverability**, there have been 21 sites over the last 10 years where completions have exceeded 100 units (market and affordable combined) per annum. On just two occasions have site's exceeded 200 units per annum (Broomhills in 2020 and Quartermile in 2014). The sites are listed below and covers a strong post-recession market period. This would indicate achieving over 200 units pa at any one site is a challenge in good market conditions and West Edinburgh is effectively being asked to deliver a multiple of this number.

- *HLA21: 194 (Niddrie Mains, inc. 108 affordable), 132 (Granton Harbour, all affordable)*
- *HLA20: 283 (Broomhills, inc.88 affordable), 137 (Shrub Place, inc.88 affordable)*

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| | <ul style="list-style-type: none">○ <i>HLA19: 123 (Liberton Gardens, inc.25 affordable), 108 (Western Harbour, all affordable)</i>○ <i>HLA18: 107 (Scotstoun Avenue), 103 (Quartermile)</i>○ <i>HLA17: 145 (Harvesters Way, Wester Hailes - affordable), 131 (Eastern General Hospital - affordable), 130 (Pennywell Road - affordable)</i>○ <i>HLA16: 108 (Fairmilehead Water Treatment site)</i>○ <i>HLA15: 124 (Quartermile)</i>○ <i>HLA14: 208 (Quartermile), 165 (Telford College), 111 (Albion Road), 108 (Salamander Place)</i>○ <i>HLA13: 109 (Gorgie Road)</i>○ <i>HLA12: 193 (Westfield Avenue), 127 (West Shore Road), 111 (Clermiston Campus)</i> |
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| Proposed City Plan 2030 Section | Part 5 – Supporting Documents: Housing Technical Note |
| Support? | No (part) |
| Proposed Changes? | <p>Changes to reflect need for amended Housing Land Requirement and amended Housing Land Supply based on deliverability assessment of Proposed City Plan 2030 sites. In this respect, given the significant discrepancy between existing affordable housing demand and the reduced affordable housing target, two options are put forward. Firstly, an adjustment based on increasing affordable housing target as set out which would require an increased market housing target to deliver affordable on a pro-rata basis. This option results in a large residual shortfall in target versus proposed supply. The second option would be to utilise City of Edinburgh Council’s proposed NPF4 minimum housing land requirement as this accords with their latest projection for a set 10 year period. These changes are detailed below.</p> <p>Executive Summary point 10 – “Land for 26,284 <u>17,000</u> units has been allocated within the Council area <u>of which land for 8,000 units can be brought forward in the plan period</u>. Combined with current land supply, which includes sites carried forward from the Edinburgh Local Development plan 2016, this provides a total land supply of 57,544 approximately 27,000 units. This is a surplus of more than 20,000 units over the housing supply target. <u>Additional sites will require to be identified through a modified City Plan following the LDP examination process.</u>”</p> <p>3.22 – Amend to reflect affordable housing target to be in excess of current Council commitment.</p> <p>Table 1 – For Option 1, amend to split Housing Need/Demand into ‘Wealth Distribution Scenario’ for Affordable Target and ‘Strong Economic Growth’ for Market Target. Market need/demand amended to 15,219 (private rent), 25,947 (owner occupied) with 41,166 total in period</p> |

2012-32 and need/demand for 2021-32 amended to 28,953. Total Housing 2012-32 figure adjusted to 91,079 (49,913 + 41,166). Net Need/Demand 2021-32 figure adjusted to 71,912 (42,929 + 28,953).

Table 2 – For Option 1, amend:

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|---|---------------------|
| Market Demand 2012-2032 (HNDA2 - upper) | 41,166 |
| Completions 2012-2021 | 12,213 |
| Market Target 2021-2032 | 28,953 |
| | |
| Affordable Demand 2012-2032 (HNDA2 – mid) | 49,913 |
| Completions 2012-2021 | 6,984 |
| Affordable Net Demand 2021-2032 | 42,929 |
| SHIP Forecast 2021-2027 | 11,342 |
| Rolled forward SHIP Forecast 2027-2032 | 9,451 |
| Additional AHP Contribution | 4,322 |
| Affordable Target 2021-2032 | 25,115 (58% demand) |
| | |
| Total Housing Supply Target 2021-2032 | 54,068 |

For Option 2, amend:

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| Total All-Tenure Housing Supply Target 2022-2032 | 38,500 |
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Table 6 – For Option 1, amend:

| | Total | Market | Affordable |
|---------------------------------------|--------|--------|------------|
| Total Housing Supply Target 2021-2032 | 54,068 | 28,953 | 25,115 |
| Generosity Allowance, 25% | 13,517 | | |
| Housing Land Requirement | 67,585 | | |

For Option 2, amend:

| | Total | Market | Affordable |
|---------------------------------------|--------|--------|------------|
| Total Housing Supply Target 2021-2032 | 38,500 | Tbc | Tbc |
| Generosity Allowance, 25% | 9,625 | | |
| Housing Land Requirement | 48,125 | | |

5.4 – 2nd line, “This shows an established land supply which could provide over ~~33,000~~ 30,000 new homes.”

5.5 – add reference to SPP para.53 with reference to need for new settlements: *“The creation of a new settlement may occasionally be a necessary part of a spatial strategy, where it is justified either by the scale and nature of the housing land requirement and the existence of major constraints to the further growth of existing settlements, or by its essential role in promoting regeneration or rural development.”*

5.8 – amend to reflect inclusion of new sustainable community locations outwith urban area.

Table 7 – For Option 1, amend:

| | 2021-2032 |
|---|------------------|
| Housing Supply Target | 54,068 |
| Generosity Allowance | 13,517 (25%) |
| A - Housing Land Requirement | 67,585 |
| Effective Supply 2021-28 (HLA21) | 16,573 |
| Effective Supply 2028-32* | 3,275 |
| Total Effective Supply | 19,848 |
| Contribution from Constrained Sites** | 2,880 |
| Contribution from Windfall Sites*** | 5,000 |
| B - Total Supply from existing sources | 27,728 |
| Required new LDP allocation (A-B) | 39,857 |
| Proposed LDP allocation**** | 8,000 |
| Residual Surplus/Shortfall | -31,857 |

*rolled forward HLA21 programming

**35% allowance from HLA21 sites (8228 units), as per 2016 LDP %

***500pa allowance based on previous windfall completions in period 2015-21, HLA21

****Proposed City Plan 2030 allocates 24,938 units across 95 sites but as detailed in **Appendix 1 – Proposed City Plan Sites Assessment**, 54 sites (-6,379 units) should be deleted as they comprise potential windfall sites only and are allowed for in general windfall allowance, 3 sites (-1,660 units) should be deleted as not available in plan period and 3 sites should have reduced capacities deliverable in plan period (-9,000 units). Allocated sites where capacities have been increased through consents have been adjusted. Net estimated delivery of 7,900 units from allocated sites has been rounded up to 8,000.

| | <p><i>For Option 2, amend:</i></p> <table border="1"> <thead> <tr> <th></th> <th>2022-2032</th> </tr> </thead> <tbody> <tr> <td>Housing Supply Target</td> <td>38,500</td> </tr> <tr> <td>Generosity Allowance</td> <td>9,625 (25%)</td> </tr> <tr> <td>A - Housing Land Requirement</td> <td>48,125</td> </tr> <tr> <td>Effective Supply 2021-28 (HLA21)</td> <td>16,573</td> </tr> <tr> <td>Effective Supply 2028-32*</td> <td>3,275</td> </tr> <tr> <td>Total Effective Supply</td> <td>19,848</td> </tr> <tr> <td>Contribution from Constrained Sites**</td> <td>2,880</td> </tr> <tr> <td>Contribution from Windfall Sites***</td> <td>5,000</td> </tr> <tr> <td>B - Total Supply from existing sources</td> <td>27,728</td> </tr> <tr> <td>Required new LDP allocation (A-B)</td> <td>20,397</td> </tr> <tr> <td>Proposed LDP allocation****</td> <td>8,000</td> </tr> <tr> <td>Residual Surplus/Shortfall</td> <td>-12,397</td> </tr> </tbody> </table> <p>5.11 – amend reference to need for additional housing allocations via a the LDP examination process and associated Modified LDP.</p> | | 2022-2032 | Housing Supply Target | 38,500 | Generosity Allowance | 9,625 (25%) | A - Housing Land Requirement | 48,125 | Effective Supply 2021-28 (HLA21) | 16,573 | Effective Supply 2028-32* | 3,275 | Total Effective Supply | 19,848 | Contribution from Constrained Sites** | 2,880 | Contribution from Windfall Sites*** | 5,000 | B - Total Supply from existing sources | 27,728 | Required new LDP allocation (A-B) | 20,397 | Proposed LDP allocation**** | 8,000 | Residual Surplus/Shortfall | -12,397 |
|---|---|--|------------------|-----------------------|--------|----------------------|-------------|-------------------------------------|--------|----------------------------------|--------|---------------------------|-------|------------------------|--------|---------------------------------------|-------|-------------------------------------|-------|---|--------|-----------------------------------|--------|-----------------------------|-------|-----------------------------------|----------------|
| | 2022-2032 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Housing Supply Target | 38,500 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Generosity Allowance | 9,625 (25%) | | | | | | | | | | | | | | | | | | | | | | | | | | |
| A - Housing Land Requirement | 48,125 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Effective Supply 2021-28 (HLA21) | 16,573 | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Contribution from Windfall Sites*** | 5,000 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| B - Total Supply from existing sources | 27,728 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Required new LDP allocation (A-B) | 20,397 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Proposed LDP allocation**** | 8,000 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Residual Surplus/Shortfall | -12,397 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Reasons for Changes? | <p>The Proposed City Plan 2030 Housing Land Requirement is based upon demand figures derived from Housing Need and Demand Assessment (HNDA) 2 (“wealth distribution” ‘medium’ scenario). This demand is the latest available assessment approved as robust and credible by the Centre for Housing Market Analysis. After allowing for housing completions between 2012-21, the identified need/demand is for 42,929 affordable homes and 19,599 market homes in the period 2012-32 (total of 62,488 homes). The Council proposes to meet the required market demand figure but sets a target for affordable homes based upon a political commitment (20,000 homes between 2017-27) and addresses less than half of the forecast demand.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | |

The Council note there have been 6,984 affordable completions between 2012-21 (Table 1) with 4,188 new-build or shared-equity units provided between 2017-21 (Table 2). Paragraph 3.21 states that 4,600 affordable homes have either been completed or acquired in the first 4 years of the Council commitment period (2017-21) and the Strategic Housing Investment Plan ("SHIP", 2021-26) forecasts 11,370 completions in the 5 year SHIP period. This totals 15,970 affordable homes. Table 1 of the updated SHIP 2022-27 (approved at the Council's Housing committee on 4th November 2021) forecasts a total of 15,914 completions in the 10 year period 2017-27. Whilst clearly a good achievement, the completion of around 16,000 affordable homes between 2017-27 will fall short of the 20,000 Council commitment figure for this period and a concerted effort is required to address more of the affordable demand.

The proposed changes provide for two options. Firstly, meeting a higher proportion of the affordable housing demand, and, secondly utilising the Council's proposed minimum all-tenure Housing Land Requirement proposed to the Scottish Government as part of the new NPF4.

Option 1 seeks amendments including setting the market housing target at the higher HNDA2 demand level. This will provide additional affordable homes via the Affordable Housing Policy mechanism. This option also seeks the Council to roll forward affordable completion forecasts from the current SHIP into a more positive affordable target for the entire period to 2032. This would be based on the following:

- a) HNDA2 net demand 2021-32: 42,989 homes (HTN Table 1)
- b) Forecast Completions 2021-27: 11,342 (SHIP 2022-27)
- c) Target Completions 2027-32: 9,451 (based on continuation of average 1,890pa forecast 2021-27)
- d) Adjustment for increase in Affordable Housing Policy from 25% to 35%, post-2022 (LDP adoption): 1,956 (based on proposed

19,559 market homes target; $19559 \times 35\% = \underline{6845}$ *minus* 19559
 $\times 25\% = \underline{4889}$)

e) Adjustment of market homes target to meet “strong economic growth” scenario in HNDA2 which would reflect strong housing market and provide for market demand of 28,953 (41,166 demand 2012-32 *minus* 12,213 completions 2012-21) and associated further affordable contribution of 2,366 ($28,953/11 = 2,632\text{pa} \times 10 = 26,320$ target 2022-32 LDP period *minus* existing 19,559 target = $6,761 \times 35\%$)

- Total amended affordable homes target 2021-32: 25,115 (b + c + d + e)

Whilst still not achieving full affordable demand, this would increase targets in the plan period to allow for a greater level of housing need to be met.

Option 2 is the minimum level that is deemed suitable and would utilise the Council’s own minimum all-tenure Housing Land Requirement proposed to the Scottish Government. Whilst the Government have reduced this figure in the draft NPF4, the Council’s own commitment to the original level should be taken into account.

Both options result in a significant shortfall in housing allocations based upon an assessment of deliverability of proposed plan allocations. The outcome is that additional sites will require to be brought forward and the spatial strategy option of new settlements should be included, in line with existing Scottish Planning Policy.

| | |
|--|--|
| Proposed City Plan 2030 Section | Part 5 – Supporting Documents: Transport Appraisal Technical Note |
| Support? | No (part) |
| Proposed Changes? | REFER TO TRANSPORT CONSULTANT REPORT |
| Reasons for Changes? | |

| | |
|--|---|
| Proposed City Plan 2030 Section | Proposals Map |
| Support? | No (part) |
| Proposed Changes? | <p>Housing Proposals</p> <ul style="list-style-type: none"> • Delete following proposals as sites constitute potential windfall opportunities only: H1, H2, H3, H4, H5, H6, H7, H9, H11, H14, H17, H18, H20, H21(part), H22, H23, H24, H25, H26, H27, H28(part), H30, H32(part), H35, H36, H37, H38, H41(part), H43, H44, H45, H46, H47, H48, H49, H50, H51, H53, H54, H55(part), H56, H57, H58, H60, H64, H66, H67, H69, H70, H71, H73, H74, H75, H77, H78, H80(part), H81, H87, H90, H94, H95 • Delete following proposals as sites not available during plan period: H8, H85 • Site H13 requires clarification from CEC for inclusion • Site H31 to be deleted if required for Gaelic Secondary School as as per proposals. • Add Housing Proposal at Hatton Village, site boundary as defined on supporting document. • Add Improved Bus Connection route on A71 (City boundary to A720) • Add Education Infrastructure site at Hatton Village • Add Local Centre and Active Travel Mobility Hub at Hatton Village |
| Reasons for Changes? | <p>Proposed changes reflect assessment of proposed housing sites addressed in response to Housing Technical Note, Part 3 (Policies) and Part 4 (Proposals). Further changes support introduction of Hatton Village as a proposed housing site with associated uses and infrastructure as set out within the supporting document.</p> |