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*improving living in scotland*



**PROPOSED EAST LOTHIAN LOCAL DEVELOPMENT PLAN  
FURTHER INFORMATION REQUEST 06, ISSUE 12 – PLANNING  
FOR HOUSING  
HOMES FOR SCOTLAND RESPONSE**

**22 September 2017**

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## ABOUT HOMES FOR SCOTLAND

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Homes for Scotland is **the** voice of the home building industry.

With a membership of some 200 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people *want* to live.

Visit [www.homesforscotland.com](http://www.homesforscotland.com) for further information and follow us on twitter @H\_F\_S

## PROCESS

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Homes for Scotland represents members on a wide range of issues affecting their ability to deliver much needed homes.

Our views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from member companies.

# Response to East Lothian Proposed Local Development Plan Further Information Request 06, Issue 12, Planning for Housing

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## Introduction

Homes for Scotland welcomes the opportunity to respond to Further Information Request 06 on Issue 12 of the Proposed East Lothian Local Development Plan Examination on Planning for Housing.

This response comprises information on questions 1 – 3 as requested by the reporter. A further response making comment on East Lothian’s response to questions 4 – 25 will be subsequently submitted within the 14 day deadline for comment.

### Question 1.

**Homes for Scotland are asked to provide a copy of their document concerning procedures for Housing Land Audits referred to in their representation and relative to this, comment on appropriate lead in times for the development of the new allocations programmed within the Council’s Technical Note 1, Appendix 2.**

- 1.1 Homes for Scotland submits the document “Housing Land Audits: Homes for Scotland Procedures” to the Reporter alongside this response, as requested.
- 1.2 Since the preparation of the East Lothian Proposed Local Development Plan (LDP), progress has been made between East Lothian Council and Homes for Scotland in agreeing both the 2016 Housing Land Audit, and more recently the 2017 Housing Land Audit. The agreed 2017 Housing Land Audit contains all LDP allocations, and is the most up to date record available to the reporter of the programming of allocated sites.
- 1.3 Homes for Scotland considers that the agreed 2017 Housing Land Audit should be used by both the council and the reporter for the purposes of calculating the effective housing land supply, and in planning for the necessary infrastructure required to support the level of development promoted within the LDP.
- 1.4 We therefore consider that Technical Note 1, Appendix 2 should be updated to include programming from the 2017 Housing Land Audit and all references in the LDP itself updated to reflect the most recent agreed audit, rather than relying on the out of date 2015 Audit, given that this information is now available and has been agreed with Homes for Scotland.

## Question 2.

The reporter notes the view expressed by Homes for Scotland in their representation (0353/3) that a level of generosity has not been added to SESplan as it was approved prior to the Scottish Planning Policy (SPP) 2014. In relation to the following statement also set out in their representation, Homes for Scotland are asked to clarify:

- a) Which plan the second sentence refers: *“East Lothian Council has not explicitly added generosity to the SDP Housing Requirement. However, in the case of this SDP, we acknowledge that an element of generosity has certainly been added, although not clearly stated within the Plan”*.
- b) Further to this, Homes for Scotland are asked to explain what the essential difference of adding generosity to the housing requirement as opposed to the housing supply (as the council has done) would make to the assumptions in the plan and the figures set out in Table HOU2.

- 2.1 In response to question 2a), Homes for Scotland is referring to the Proposed East Lothian Local Development Plan when stating *“within the Plan”*.
- 2.2 Scottish Planning Policy (SPP) 2014 requires the overall housing supply target to be increased by a margin of 10 to 20% *“to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan”* (paragraph 116). Further, SPP goes on to state in paragraph 118 that *“Strategic development plans should set out the housing supply target for the plan area, each local authority area, and each functional housing market area.”*
- 2.3 SESplan was approved prior to the publication of SPP 2014, therefore the terminology differs. SESplan sets out a housing requirement for each local authority area. Homes for Scotland suggests that it can be reasonably presumed that the SESplan housing requirement can be equated to the housing supply target within SPP 2014.
- 2.4 As stated in the Homes for Scotland response to the East Lothian Proposed LDP, and acknowledged above in the reporter’s question, Homes for Scotland believes that a level of generosity has not been added to SESplan as it was approved prior to the publication of SPP 2014. Therefore, to comply with the requirements of SPP 2014, the LDP must add a generosity margin of 10 to 20% to the housing supply target (the SESplan housing requirement) to establish the housing land requirement for East Lothian and ensure that a generous supply of land for housing is provided.
- 2.5 Therefore in response to question 2b), Homes for Scotland acknowledges that an element of generosity has certainly been added by East Lothian Council, however this has not been explicitly set out within the LDP and the level of

generosity has not been clearly evidenced. We maintain that a generosity margin of 10 – 20% must be added to the SESplan housing requirement (housing supply target) and be clearly set out within Table HOU2 together with a robust justification of the level of generosity chosen, to be fully compliant with paragraph 116 of SPP.

### **Question 3.**

**Homes for Scotland are asked to elaborate why, in the circumstance where a shortfall is caused by marketability, Policy HOU2 is not relevant and land cannot be brought forward for development.**

- 3.1 The comment referred to in the reporter’s question above relates to the concerns raised by Homes for Scotland in its response to the Proposed LDP that Paragraphs 3.46-3.48 of the Proposed LDP seem to be seeking to remove marketability as a relevant factor when calculating the 5-year effective housing land supply.
- 3.2 Homes for Scotland acknowledges Planning Advice Note 2/2010 Affordable Housing and Housing Land Audits is the relevant national guidance on calculating effective housing land supply and is a material consideration. Paragraph 55 of PAN 2/2010 states *“to assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing (i.e. residential units can be completed and available for occupation), and will be free of constraints on the following basis:”*. Marketability forms part of the subsequent list.
- 3.3 Paragraph 3.48 of the Proposed Plan suggests that the Council will not consider a shortfall due to “marketing constraints”. Therefore, Homes for Scotland is concerned that if marketability is excluded, this would be contrary to PAN 2/2010 and could result in a situation where there is unmet need in the area, but not a numerical shortfall calculated due to the exclusion of marketability as a factor, so Policy HOU2 would not apply.
- 3.4 For clarity, Homes for Scotland considers that, in accordance with PAN 2/2010, marketability should be included as a relevant factor in the calculation of the 5-year effective housing land supply. If marketability is included, all relevant factors will be taken into consideration when calculating the 5-year effective housing land supply, giving a more accurate and realistic picture of the housing land supply. In the event of a shortfall in housing land supply, Policy HOU2 would apply and allow for land to be brought forward for housing development.

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