



CITY OF EDINBURGH COUNCIL
PROPOSED 'CITY PLAN' CONSULTATION
EXECUTIVE SUMMARY OF HFS RESPONSE
16 DECEMBER 2022

This is an executive summary of the full Homes for Scotland (HFS) response to the City Plan Proposed Plan consultation.

Homes for Scotland (HFS) welcomes the opportunity to submit comments in respect of the City Plan Proposed Plan.

Our response is focused on the extent to which City Plan is likely to succeed in enabling the delivery of the much-needed homes of all tenures that are required to deliver on the City of Edinburgh Council's stated aims and ambitions.

The LDP for Edinburgh should be founded on a strong understanding of housing need and demand in the city, with the most sustainable and deliverable sites identified to meet that need and demand within the plan period. Instead, City Plan appears to have been founded on the principle of not releasing any further greenfield land for housing, irrespective of the implications of that.

This is despite historic trends demonstrating that success in delivering much-needed homes of all tenures is best achieved through a blend of greenfield and brownfield land releases.

The Council's decision has resulted in a search for brownfield land which has identified significant amounts of land already in productive employment use and which will not become available for home building without significant disruption to Edinburgh businesses, and significant cost to the City of Edinburgh Council if it has to embark on an extensive and time-consuming programme of compulsory purchase.

Even with perseverance, the land identified in this plan will not be capable of delivering the new homes required within the plan period.

This will have a direct and worsening impact on the well-documented affordability crisis facing those seeking to rent or buy a home in Edinburgh.

Key concerns HFS is raising on the component parts of the plan are:

Part 1 – Introduction:

- There is a lack of awareness of the critical contribution of the private sector in delivering the homes of all tenures that are required across Edinburgh.

- Restrictive policies render the goal of delivering enough homes to meet the needs of the people of Edinburgh impossible to achieve.

Part 2 – Strategy and Aims

- The high-risk nature of the brownfield-only approach to the allocation of new sites for residential development, especially when a blended approach has historically been vital to delivering enough homes.

Part 2 – City Plan Spatial Strategy

- The way the Council has sought to meet its ideological preference of not releasing any new greenfield land will thwart the steady supply of new homes that the city needs and exacerbate its existing affordability crisis.
- The plan is over-reliant on brownfield sites, many of which are unviable, unavailable, or unable to be delivered due to the restrictive policies elsewhere in the Plan.
- There is a lack of evidence on availability or programming of sites and inability to show that they will deliver the required homes within the plan period. This is contrary to Scottish Planning Policy.
- There is no evidence that the timescale, employment base or financial consequences of a compulsory purchase programme have been properly considered.
- The sites allocated in the plan will only yield about half of the new homes the Council is relying on them to deliver.
- The Council does not appear to have identified the necessary employment land to accommodate the businesses being displaced to give the Council its brownfield housing strategy. The Ryden report (December 2020) highlighted this risk, and that the strategy may result in businesses having to relocate to Fife and the Lothians. This is not sustainable.

Part 2 – City Plan 2030 Outcomes

- The Proposed Plan risks exacerbating existing affordability issues.
- The technical policies are contradictory and often impractical. In combination they themselves form a barrier to achieving the intended outcomes of the plan.

Part 3 – Environment and Design Policies

- The density policy is inconsistent with numerous other policies (placemaking, open space, etc.). It is overly restrictive and not appropriate for all areas. Not all new development should be focussed on smaller, flatted homes. The plan

should also provide for the detached family houses with gardens which Edinburgh is lacking in and which are in such high demand.

Part 3 – Housing Policies

- The housing supply target does not seek to meet all of the housing need that has been evidenced. The Council has not explained its reasoning or considered the consequences that this under-planning will have on affordability.
- Having decided not to fully plan for its own evidenced housing need and demand, the Council has then failed to identify sufficient effective and deliverable land to meet even its own preferred housing supply target.
- There is a lack of information as to why the Council's very strict brownfield-first strategy was selected in favour of a more balanced approach with a blended supply of deliverable sites (both brownfield and greenfield).
- The Council has not recognised wider impact these policies and its strategy will have on infrastructure and employment.
- Several sites have been included that are being promoted by the Council, with no sign that the landowners are willing to release them. Not all of these sites were included within the "Choices for City Plan" Main Issues Report consultation.
- There is a lack of evidence to support the assumption that a 35% affordable homes requirement will deliver more affordable homes rather than making housing delivery less viable. The Council hasn't provided its evidence on this.
- A significant proportion of the brownfield sites allocated for housing development are occupied by a variety of businesses that provide employment and add to Edinburgh's rich mix of existing uses. It does not appear the Council has fully considered the work involved in project managing the relocation of these businesses, or the social and economic implications of displacing them to make way for housing development. Nor has it grasped the extent to which housing delivery would be delayed whilst the Council led what would have to be an unprecedented programme of compulsory purchase and relocation.

Part 3 – Infrastructure and Transport Policies

- There is a lack of evidence to support the developer contributions required, particularly in respect of education.
- It is not clear how or where the additional infrastructure needed to serve the allocated housing in North-East Edinburgh would be delivered (education and drainage in particular).
- Brownfield sites are generally located in urban areas with less available land for the delivery of new infrastructure. This does not appear to have been thought about.

In summary, HFS does not feel the City of Edinburgh is planning for the delivery of enough new homes, given the Council's own evidence base on need and demand. Furthermore, the significant reliance on active employment sites, combined with compliance barriers arising from new and tightened policies, will stop the Council achieving even the reduced number of new homes it has itself adopted as a housing supply target. This will not result in good outcomes for the city and will in particular exacerbate its existing affordability crisis. The policies are contradictory and are not conducive to a sound plan.

For the reasons set out here and in our full response, HFS does not consider this to be an effective or deliverable plan. It should not be submitted for examination in its current form. Its flaws are of such significance that we question the ability of an examination process to tackle them. The amount of additional land that is required and the extent of the changes needed to the spatial strategy are issues that should be resolved by the Council prior to examination.