

Proposed Local Development Plan 2

2020

Monitoring Statement Appendix 4 - Housing Background Report



September 2020



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East Dunbartonshire Council

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EAST DUNBARTONSHIRE LOCAL DEVELOPMENT PLAN 2

Housing Background Report

1. Introduction

Report Purpose

The purpose of this report is to support the publication of the East Dunbartonshire Local Development Plan 2 Proposed Plan by providing further detail on the Council's approach to new housing in the plan.

Scottish Planning Policy (SPP) requires Planning Authorities to allocate sufficient land for new housing in Local Development Plans. SPP states that plans should be informed by a robust Housing Need and Demand Assessment (HNDA), prepared in line with the Scottish Government's HNDA Guidance. In Scotland's city regions Local Development Plans are currently required to be consistent with the adopted Strategic Development Plan (note that the Local Development Plan is progressing under the system prior to the Planning (Scotland) Act 2019) which for the Glasgow and Clyde Valley city region is the Clydeplan Strategic Development Plan July 2017.

A Housing Need and Demand Assessment was undertaken by the Glasgow and the Clyde Valley Housing Market Partnership (comprised of planning and housing officials from the 8 constituent Glasgow and Clyde Valley local authorities) to inform the current adopted Strategic Development Plan. The Housing Need and Demand Assessment was assessed as 'robust and credible' by the Centre for Housing Market Analysis (part of the Scottish Government) in 2015.

Although the Housing Need and Demand Assessment has been deemed robust and credible and the Strategic Development Plan is fully adopted, interpreting the requirements of Scottish Planning Policy continues to be an area of complexity and conflict. This report therefore aims to set out clearly how the Council addresses the key requirements of Scottish Planning Policy with regards to housing land supply and housing policy.

Main Issues Report Representations

Many of the representations to the Main Issues Report (MIR), which was published for public consultation on October 15th 2019, relate directly to the issue of housing land and new housing development. Detailed summaries of the representations are provided within the Report of Consultation which also includes a short high-level summary of the Council's response. Given the complexities of housing land and housing policy this background report provides a further response to points raised in MIR representations where appropriate.

Monitoring Statement and Other Supporting Information

A Monitoring Statement was published alongside the Main Issues Report to providing technical and background information. The Monitoring Statement provides an overview of the national policy, issues, evidence and potential options for addressing each policy area in Local Development Plan 2.

This background report is intended to build-upon the housing section of the Monitoring Statement by focussing on the chosen approach to housing land and where extra information or an updated position is required. This report does not however fully replace the Monitoring Statement housing section and therefore both reports should be considered in conjunction with each other, and also Monitoring Statement Appendix 8 - Site Assessments.

The Local Development Plan is also supported by research on 'Older Peoples and Specialist Housing' which was commissioned jointly by the Housing and Planning Teams of the Council and the Health and Social Care Partnership (Monitoring Statement Appendix 6).

Key Terms and Components

- **Town and Country Planning (Scotland) Act 1997, as amended by the Planning etc. (Scotland) Act 2006** – The 1997 and 2006 Acts currently provide the legislative basis for preparing the Local Development Plan and sets a number of requirements including the process to be followed in producing the plan, and in city regions, the requirement for Local Development Plans to be consistent with the adopted Strategic Development Plan.
<http://www.legislation.gov.uk/ukpga/1997/8/contents>
<http://www.legislation.gov.uk/asp/2006/17/contents>
- **Planning (Scotland) Act 2019** – The Scottish Government commissioned a review into the planning system in September 2015 which ultimately led to the granting of a new planning act in 2019. However, as the reforms to the planning system are wide ranging and in many cases require secondary legislation or updated policy to be in place and the transition to the new system has not yet been completed, Local Development Plan 2 is procedurally being prepared under the previous regulations.
<https://www.transformingplanning.scot/planning-reform/legislation/>
- **Strategic Development Plan (SDP)** – Local Development Plan 2 is required to be consistent with the Strategic Development Plan and is the local expression of the city region spatial strategy. The Clydeplan SDP Authority which prepares the plan is comprised of the 8 Local Authorities in the Glasgow and Clyde Valley area. The current Clydeplan SDP was adopted in July 2017.
<https://www.clydeplan-sdpa.gov.uk/strategic-development-plan/current-plan/current-strategic-development-plan-july-2017>
- **Housing Need and Demand Assessment (HNDA)** – Housing and Planning legislation requires Local Authorities to prepare an assessment of housing need and demand in their area to inform targets and policies for new housing in local housing and planning strategies. In city regions Local Authorities should work together to undertake this work recognising that housing need and demand will rarely coincide with local authority boundaries.
<https://www.clydeplan-sdpa.gov.uk/docman/current-plan-july-2017-background-reports/73-background-report-2-glasgow-and-the-clyde-valley-housing-need-and-demand-assessment-may-2015/file>
- **Housing Market Areas and Sub Areas** – Given the cross-boundary and complex nature of housing need in the city region the Glasgow and Clyde Valley Housing Market Partnership

produces the Housing Need and Demand Assessment using a multi-tiered approach. All of East Dunbartonshire is contained within 'Central Conurbation' high level market area. At the housing market sub area level East Dunbartonshire is split between two areas;

- The Bearsden and Milngavie area is contained with the Greater Glasgow North and West sub market area, which also includes Clydebank and city of Glasgow North West; and
- The Strathkelvin area is contained within the Strathkelvin and Greater Glasgow North East sub market area which also includes city of Glasgow North East.

Click here for [HMSA MAP](#)

- **Local Housing Strategy (LHS)** – Each Local Authority in Scotland is required by the Housing (Scotland) Act 2001 to prepare a Local Housing Strategy (LHS). The current LHS for East Dunbartonshire was adopted in April 2017 and sets out the key priorities for all aspects of housing policy in East Dunbartonshire. The LHS includes housing targets which are aligned with the Housing Need and Demand Assessment and targets in the Clydeplan SDP 2017. <https://www.eastdunbarton.gov.uk/residents/housing/local-housing-strategy-2017-2022>
- **Housing Supply Target** – The Housing Supply Target is a policy view of the number of homes the authority considers can be delivered in the area over the periods of the development plan and local housing strategy. The target should be based on the Housing Need and Demand Assessment estimates taking into account wider economic, social and environmental factors, issues of capacity, resource and deliverability, and any other relevant factors.
- **Generosity** – Scottish Planning Policy requires the Housing Supply Target to be increased by a margin of 10 to 20% to provide extra flexibility in the supply to ensure that the Housing Supply Target is met by the end of the plan period (assuming that a percentage of the sites will not be brought forward for development). The adopted Clydeplan Strategic Development Plan sets a generosity level of 15% for LDP's in the Glasgow City Region area.
- **Housing Land Requirement** – The Housing Land Requirement is the total amount of land that has to be allocated in the development plan for new housing. The Housing Land Requirement is the resultant figure after the 15% generosity has been applied to the Housing Supply Target.
- **Housing Land Audit (HLA)** – The audit is prepared annually and supports the East Dunbartonshire Local Development Plan by monitoring the availability of land for new housing and to estimate the likely levels of development for the next 5 years and beyond. The audit also records the number of new housing units that have been built in previous years. <https://www.eastdunbarton.gov.uk/residents/planning/planning-policy/housing-land-audit>
- **Action/ Delivery Programme** – Action/ Delivery Programmes support the Local Development Plan by setting out how the authority proposes to implement the Plan. They set out a detailed plan of actions needed to deliver the key infrastructure, proposed development sites and policies in the Plan. The Proposed Delivery Programme has been published with the Proposed Plan.

Housing Land Supply Summary

Clydeplan SDP Housing Supply Target (Pg5)

The adopted Strategic Development Plan (SDP) sets out a Housing Supply Target for East Dunbartonshire. The housing targets in the LDP are required to be consistent with the SDP target (see Local Housing Strategy box adjacent). The targets in the SDP are based on the Housing Needs and Demand Assessment which utilises data from 2012 and are split into two time periods: 2012—2024 & 2025—2029.

Adopted Local Housing Strategy 2017 (Pg5-6)

Housing targets within LHS's and LDP's are expected to be aligned with each other and the SDP. The current LHS was adopted in April 2017 and amended the affordable Housing Supply Target in the SDP to reflect the announcement of additional funding for affordable housing in 2015. This is permitted by Policy 8 of the SDP.

As a portion of the affordable housing built in East Dunbartonshire is delivered through developer contributions, a consequential adjustment was also made to the private supply target. The LHS amendment to the SDP target only applies to the Period 2012—2024.

Extended Period from 2029 to 2032 (Pg6-7)

Scottish Planning Policy requires LDP's to project forward a land supply for a 10 year period from the expected year of adoption. The Strategic Development Plan assumes that Local authorities will adopt their LDP's within 2 years of SDP adoption and therefore they project forward 12 years. As the Proposed Plan is out of sync with the SDP the second period of targets in the SDP have been extended by 3 years.

Housing Land Audit Completions (Pg8-9)

This is the total number of new housing units built in East Dunbartonshire from 2012 to 2019. Given the time lag from the publication of the data upon which the SDP targets are based on and the production of Local Development Plans, the housing units that have already been delivered require to be subtracted to determine the portion of the Housing Supply Target that is still to be delivered.

Generosity (Pg8-9)

Scottish Planning Policy requires the Housing Supply Target to be increased on the assumption that some of the sites allocated in the LDP for housing will not be brought forward during the lifetime of the plan and therefore to provide extra flexibility. The agreed margin of generosity in the Clydeplan Strategic Development Plan area is 15%.

Existing Supply - Housing Land Audit 2019 (Pg29-30)

The existing supply figure is the total number of new housing units programmed in the agreed 2019 Housing Land Audit for completion in the future. The supply in the audit comprises of the unbuilt housing units on sites allocated in the current Local Development Plan together with 'windfall' sites that were not included in the plan and have achieved planning consent since the LDP was prepared.

Deallocated Sites (Pg24-25)

To ensure that the sites contained within LDP 2 are deliverable within the plan period 3 existing sites have been removed due to constraints that are unlikely to be overcome. These sites are:

- 6.27 Thomas Muir Ave & 6.20 Crofthead, Bishopbriggs
- 6.57 Lennox Castle (listed building), Lennoxtown

New Site Allocations (Pg22)

This is the total **indicative** number of units provided in the new housing allocations appearing for the first time in the Proposed Plan. This also includes one site which is already allocated but where there is a significant increase in capacity. Note that this figure does not include any units at the Westerhill or Kirkintilloch Gateway Masterplan Areas that are subject to further work to establish the extent of land suitable for new housing.

Tenure

Affordable - Housing that is considered to be affordable to those on modest incomes including social rent and intermediate tenures such as shared equity and mid-market rent.

Private - Housing that is available on the open-market including owner-occupied and private rent.

All-Tenure - This is the total figure combining affordable and private together.

Windfall Allowance (Pg27-29)

This is an estimate of the contribution to the supply that will be made through sites coming forward that have not been included in the Proposed Plan. The windfall allowance is based on average completions over the last 10 years on sites that were not allocated in the development plan at the time consent was granted. The Council considers there is no evidence that future conditions are likely to be materially different and that previous completions form a reasonable assumption for windfall during the life of the plan.

Period 2012 – 2024: Based on LHS 2017 Target			
	Affordable	Private	All Tenure
Strategic Development Plan Housing Supply Target	630	1,610	2,240
Local Housing Strategy Revised Housing Supply Target	1,300	2,400	3,700
Period 2025 – 2032: Based on Clydeplan Strategic Development Plan 2017 (Extended from 2029 to 2032)			
	Affordable	Private	All Tenure
Strategic Development Plan Housing Supply Target	0	32	32
OVERALL PERIOD 2012 – 2032			
	Affordable	Private	All Tenure
2012 – 2024 Housing Supply Target	1,300	2,400	3,700
Plus 2025 – 2032 Housing Supply Target	0	32	32
Minus Completions (2012—2019)	603	1,789	2,392
Equals	697	643	1,340
Plus 15% Generosity	105	96	201
EQUALS HOUSING LAND REQUIREMENT	802	739	1,541
Existing Supply			
Existing Supply (Housing Land Audit 2019)	870	1,610	2,480
Minus Deallocated Sites	8	66	74
Plus New LDP Allocations	214	255	469
Plus Windfall Allowance	138	418	556
EQUALS TOTAL HOUSING SUPPLY	1,214	2,217	3,431
Surplus/ Shortfall to Target	+412	+1,478	+1,890

2. Setting the Housing Land Requirement

Housing Supply Target

Clydeplan 2017 & HNDA2

In city regions Strategic Development Plans are required to set out a Housing Supply Target and Housing Land Requirement for each Local Authority based on a Housing Needs and Demand Assessment (HNDA). The target should be reasonable and properly reflect the HNDA estimate of demand. HNDA 2 received robust and credible status from the Centre for Housing Market Analysis in May 2015 and subsequently formed the basis for the Housing Land Requirement in Strategic Development Plan 2017 taking various different factors into account.

The HNDA is undertaken using a tiered approach of housing market areas reflecting the cross-boundary nature of housing demand and the different levels of interaction across the wider Glasgow and Clyde Valley area. This is further explored in the section below entitled ‘Housing Market Sub Areas.’

The adopted SDP has been endorsed through examination and a legal challenge, both of which found the approach to housing land to be reasonable and in accordance with the requirements of Scottish Planning Policy. The Housing Supply Target set by the Strategic Development Plan is set out in the table below.

Table 1 – Clydeplan Strategic Development Plan 2017 Housing Supply Target for East Dunbartonshire

Time Period	Social Sector	Private Sector	All Total
<i>2012 - 2024</i>	<i>630</i>	<i>1,610</i>	<i>2,240</i>
<i>2024 - 2029</i>	<i>0</i>	<i>20</i>	<i>20</i>
2012 - 2029	630	1,630	2,260

Local Development Plans are required by the Town and Country Planning (Scotland) Act 1997 to be consistent with the Strategic Development Plan and therefore the targets contained within the SDP should be the main basis and focus for the housing targets in Local Development Plan 2. There are however a number of other matters which require to be addressed, either due to reasons such as considering other relevant strategies and technical matters, or where objections to the Council’s approach have been raised in the Main Issues Report consultation. These matters and any subsequent impact on the targets are considered in the following sections.

Adopted Local Housing Strategy 2017

Scottish Planning Policy (SPP) states that the target in the LDP should be consistent with the Strategic Development Plan. SPP also expects that LDP’s will be closely aligned with Local Housing Strategies (which themselves should be aligned to the SDP and Housing Need and Demand Assessment (HNDA)).

In April 2017 the Council published a new Local Housing Strategy (LHS) based on the figures contained within the Clydeplan Strategic Development Plan 2017 and HNDA 2. SDP 2017 includes

wording reflecting the Scottish Government announcement of additional funding in 2015/16 stating that 'LDP's may allocate additional land over-and-above the social sector Housing Land Requirement if evidence indicates that this is appropriate and would support the delivery of additional social sector housing'.

During the preparation of the LHS it was considered that, whilst the announcement of additional funding for affordable housing made by the Scottish Government in 2015 was taken into account during the examination of the SDP 2017, there was capacity locally within East Dunbartonshire to increase the affordable housing target (as is permitted by the SDP). This was based upon available funding and evidence of continuing need, including the Council's housing waiting list. The Housing Service worked closely with the Planning Service during the setting of the housing targets within the LHS and the increase was considered in-line with the overall HNDA process and the wider strategy within the 2017 Strategic Development Plan.

In East Dunbartonshire land for affordable housing is delivered through two main routes. The first route is sites that are publicly owned and are promoted and developed solely by Registered Social Landlords and/ or the Council. The second route is through developer contributions from private developers where a minimum of 25% of the units on the site will be delivered as affordable housing. Therefore, in order to increase the delivery of affordable housing the private target must be re-assessed to ensure it can provide additional land to support the affordable target. As a result of this process the private target was also increased as a direct consequence of increasing the affordable target.

The 2017 Local Housing Strategy states that the target may change during the lifetime of the LHS, that affordable housing delivery will be monitored by the Housing Land Audit and that the target will be reviewed by LDP2. The majority of the additional funding announced by the Scottish Government in 2015 is still filtering through into delivery and there has been no material change in local housing need and the waiting list since the publication of the LHS. Therefore it is considered that LDP 2 should not make any changes to the agreed targets in the adopted LHS.

Whilst the Local Development Plan is required to set a housing requirement for 10 years projecting forward from adoption, the Local Housing Strategy process contains more flexibility. As such the targets within the current LHS are aligned within the first period of HNDA 2 only, which runs from 2012 to 2024. Given that the future level of affordable housing funding is uncertain and as the LDP target is required to be consistent with the adopted SDP, the Council considers that it would not be appropriate to amend the target for the second period of the SDP (2025 – 2029). Note however that the allocation of new brownfield sites for affordable housing in the Proposed LDP will ensure an affordable housing programme beyond 2024.

In conclusion the Council therefore considers it is appropriate to amend the Housing Supply Target to match the target within the Local Housing Strategy, as this would be consistent with the adopted Strategic Development Plan but that any further revisions would be inappropriate.

Plan Period and Alignment with the Strategic Development Plan

Scottish Planning Policy requires Local Development Plan's to allocate land for a ten year period from the expected date of adoption. The Clydeplan Strategic Development Plan 2017 sets housing targets for a 17 year period from 2012 to 2029, for the following reasons:

1. To reflect the base date of the Housing Need and Demand Assessment and the population trend information upon which it is based (2012); and
2. To project forward 12 years from the adoption of the Strategic Development Plan, thus providing Local Authorities 2 years to bring forward their LDP's.

Whilst Local Authorities are able to work concurrently on their LDP's before the Strategic Development Plan (SDP) is adopted, in reality the timing of Local Development Plans to fit with SDP's has proved difficult. In East Dunbartonshire's case the current Local Development Plan, which is aligned with the previous Strategic Development Plan, was only adopted 6 months before the adoption of the follow-up SDP. Subsequently, the 10 year period from the expected date of adoption for Local Development Plan 2 (February 2022) extends beyond the period set out in the Strategic Development Plan by 3 years from 2029 to 2032.

The preferred option for housing in the Main Issues Report (MIR) proposed that the target period for LDP2 should be extended from 2029 to 2032 to allow a full 10 years from the expected adoption of the plan. The representations to the MIR from the housebuilding industry tended to agree with the Council that the period should be extended (although did not necessarily agree with the method for doing so, please see below). Given that there is great uncertainty regarding the future availability of funding for affordable housing and uncertainty regarding future private demand it is considered that the most appropriate approach is to extend the target for the second period (2024 to 2029) by an additional three years as per the table below.

Table 2 – Extension of SDP Housing Supply Target from 2025 – 2029 to 2025 - 2032

	Affordable	Private	All Tenure
Strategic Development Plan Housing Supply Target (HST) 2024 – 2029 (A)	0	20	20
<i>Yearly target (A Divided by 5 = B)</i>	0	4	4
3 Year target to be added to SDP HST to extend until 2032 (B multiplied by 3 = C)	0	12	12
Extrapolated Housing Supply Target 2024 – 2032 (A Plus C)	0	32	32

The Council considers that given the period of overshoot is three years, three years should be added to the Housing Land Requirement by extrapolation and that aligning with the requirements of Scottish Planning Policy to provide a target for 10 years after adoption would outweigh the imprecise nature of the extrapolated figures (the extrapolated figure does not equate to real evidenced need and demand).

Some of the representations from the development industry to the Main Issues Report contend that the extended period from 2029 to 2032 should be calculated using a yearly average taken across the whole SDP target period from 2012 to 2029 and multiplied by three. The Council does not agree with this approach for the reasons set out above.

Subsequent statistics and projections

A number of representations from the development industry have contended that the Housing Need and Demand Assessment (HNDA) is out of date and that the National Records of Scotland (NRS) household projections produced in 2016 should be taken into account in calculating the Housing Supply Target. Two of those representations sought for the household projections to be expressly used as the Housing Supply Target for Local Development Plan 2. Both representations interpreted the projections differently and used differing methodologies thus providing different alternative targets.

Whilst it is accepted that there is a lag between the base date of the HNDA and the publication of the proposed Local Development Plan, Scottish Planning Policy (SPP) is clear that 'plans should be informed by a robust Housing Need and Demand Assessment.' The HNDA is produced through a rigorous process following Scottish Government guidance giving in-depth consideration to various factors. Conversely, the National Records of Scotland projections are purely trend based and are not subject to a robust process such as the HNDA. Therefore, any potential benefit of using a more up to date figure would be significantly out-weighted by the approximate nature of projections and be contrary to SPP which does not make any references to National Records of Scotland projections. Moreover, Local Development Plans are required to be consistent with the targets within the Strategic Development Plan.

Application of Generosity and Completions

Scottish Planning Policy states that the Housing Supply Target should 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 adopted Clydeplan Strategic Development Plan 2017 establishes a requirement to provide a generosity level of 15%. This was incorporated into the Council's preferred option in the Main Issues Report and the percentage of generosity to be applied was not disputed by the development industry.

The base date of the Housing Need and Demand Assessment (2015) that informed the housing targets contained within the adopted Clydeplan Strategic Development Plan is the year 2012. A significant proportion of the target period from 2012 has therefore elapsed and some of the target has already been met. Scottish Planning Policy requires the Housing Supply Target to be increased to provide extra flexibility for the purpose of ensuring that the target is met by the end of the plan period, assuming that a percentage of the sites will not be brought forward for development. For the years 2012 to 2019 there is no uncertainty as to the number of units that will be delivered and therefore the Council considers that applying a generosity to this period would not serve its intended purpose. It is therefore necessary to include the number of new housing occupations since 2012 in the housing land calculations before calculating the 15% generosity to be applied to the Housing Supply Target.

The Housing Land Audit (HLA) is prepared annually and provides a record of new housing occupations in East Dunbartonshire. Due to the Covid-19 pandemic progress on the 2020 has been delayed and therefore the Proposed LDP is based on the 2019 HLA (the impact of Covid-19 is discussed further in the relevant section of this report below). Table 3 below sets out past private and affordable housing completions taken from the 2019 HLA.

Table 3 – Housing Completions 2012/13 to 2018/19

Year	Affordable	Private	All Tenure Total
2012-2013	168	247	415
2013-2014	114	290	404
2014-2015	117	249	366
2015-2016	82	290	372
2016-2017	55	284	339
2017-2018	36	211	247
2018-2019	31	218	249
2012 – 2019 Total	603	1,789	2,392

Taking the completions from the Table 3 above Table 4 below demonstrates how previous completions and the application of generosity has amended the Housing Supply Target.

Table 4 – Completions and Calculation of 15% Generosity to Housing Supply Target

	Affordable	Private	All Tenure Total
2012 – 2032 Housing Supply Target (taking LHS and time period amendments into account) (A)	1,300	2,432	3,732
Completions (B)	603	1,789	2,392
HST Subtotal (A minus B = C)	697	643	1,340
15% Generosity (C divided by 100 then multiplied by 15 = D)	105	96	201
Equals Housing Land Requirement (C plus D)	802	739	1,541

In their response to the Main Issues Report Homes for Scotland disagreed with the Council's proposed approach of subtracting completions before calculating the level of generosity to be applied to the Housing Supply Target. Homes for Scotland instead advocated applying the 15% generosity to the whole of the plan period. The Council disagrees with this approach for the reasons set out above.

Housing Land Requirement in Local Development Plan 2

Given the considerations above and bringing together the Council's approach to the Housing Supply Target, time periods, completions and generosity the Housing Land Requirement in the Proposed Plan is set out in the table below.

Table 5 – Housing Land Requirement (with existing allocations only)

Period 2012 – 2024: Based on LHS 2017 Target			
	Affordable	Private	All Tenure Total
<i>Strategic Development Plan Housing Supply Target</i>	630	1,610	2,240
Local Housing Strategy Revised Housing Supply Target	1,300	2,400	3,700

Period 2025 – 2032: Based on Clydeplan Strategic Development Plan 2017 (Extended from 2029 to 2032)			
	Affordable	Private	All Tenure Total
Strategic Development Plan Housing Supply Target	0	32	32
OVERALL PERIOD 2012 – 2032			
	Affordable	Private	All Tenure Total
2012 – 2024 Housing Supply Target	1,300	2,400	3,700
Plus 2025 – 2032 Housing Supply Target	0	32	32
Minus Completions	603	1,789	2,392
Equals	697	643	1,340
Plus 15% Generosity	105	96	201
EQUALS HOUSING LAND REQUIREMENT	802	739	1,541
Existing Supply (Housing Land Audit 2019)			
Existing Supply (Housing Land Audit 2019)	870	1,610	2,480
Surplus/ Shortfall to Target	+68	+871	+939

Table 5 demonstrates that the Housing Supply Target in the Proposed Plan can be met from the established supply in the 2019 Housing Land Audit. Whilst there is significant additional generosity in the private and all tenure supplies, the affordable housing supply has a surplus of 68 units.

Housing Market Sub Areas

Overview of Clydeplan Housing Market Sub Areas

Given the cross-boundary and complex nature of housing need in the city region the Glasgow and Clyde Valley Housing Market Partnership produces the Housing Need and Demand Assessment (HNDA) using a multi-tiered approach. The use of different geographic building blocks in assessing housing need and demand allows matters such as mobile demand, local demand and supply, market self-containment and management areas for affordable housing to be considered when producing estimates through the HNDA tool.

The top tier Housing Market Area (HMA) is the 'Conurbation' which includes all of the city region, with the exception of the Dumbarton and Vale of Leven HMA in West Dunbartonshire and the Inverclyde HMA which constitutes the majority of that authority area (except Kilmacolm and Quarriers Village). These HMA's have been deemed to be significantly self-contained and therefore interaction with the wider city region is limited in nature.

In the 2nd Tier, all of East Dunbartonshire is contained within 'Central Conurbation' Housing Market Area which also includes all of Glasgow City, Renfrewshire and East Renfrewshire and parts of North

Lanarkshire, South Lanarkshire, West Dunbartonshire and Inverclyde. This demonstrates that a reasonable degree of demand is mobile across a wide geographic area.

At the 3rd Tier, East Dunbartonshire is split between two Housing Market Sub Areas;

- Greater Glasgow North and West - which includes Bearsden and Milngavie alongside Clydebank and the northwest of Glasgow City; and
- Strathkelvin and Greater Glasgow North East – which includes the Strathkelvin area of East Dunbartonshire alongside the northeast of Glasgow City.

It is note-worthy that no parts of East Dunbartonshire sit in any of the market tiers alone and that the local housing markets in East Dunbartonshire are highly integrated with other parts of the conurbation.

Whilst Scottish Planning Policy requires planning authorities to have clear targets for new housing in their area, the tiered approach demonstrates the cross-boundary and complex nature of housing need and demand, and the importance of a coherent and consistent strategy in meeting this need across the city region whilst supporting the SDP policy approach of best use of land as a resource through brownfield regeneration.

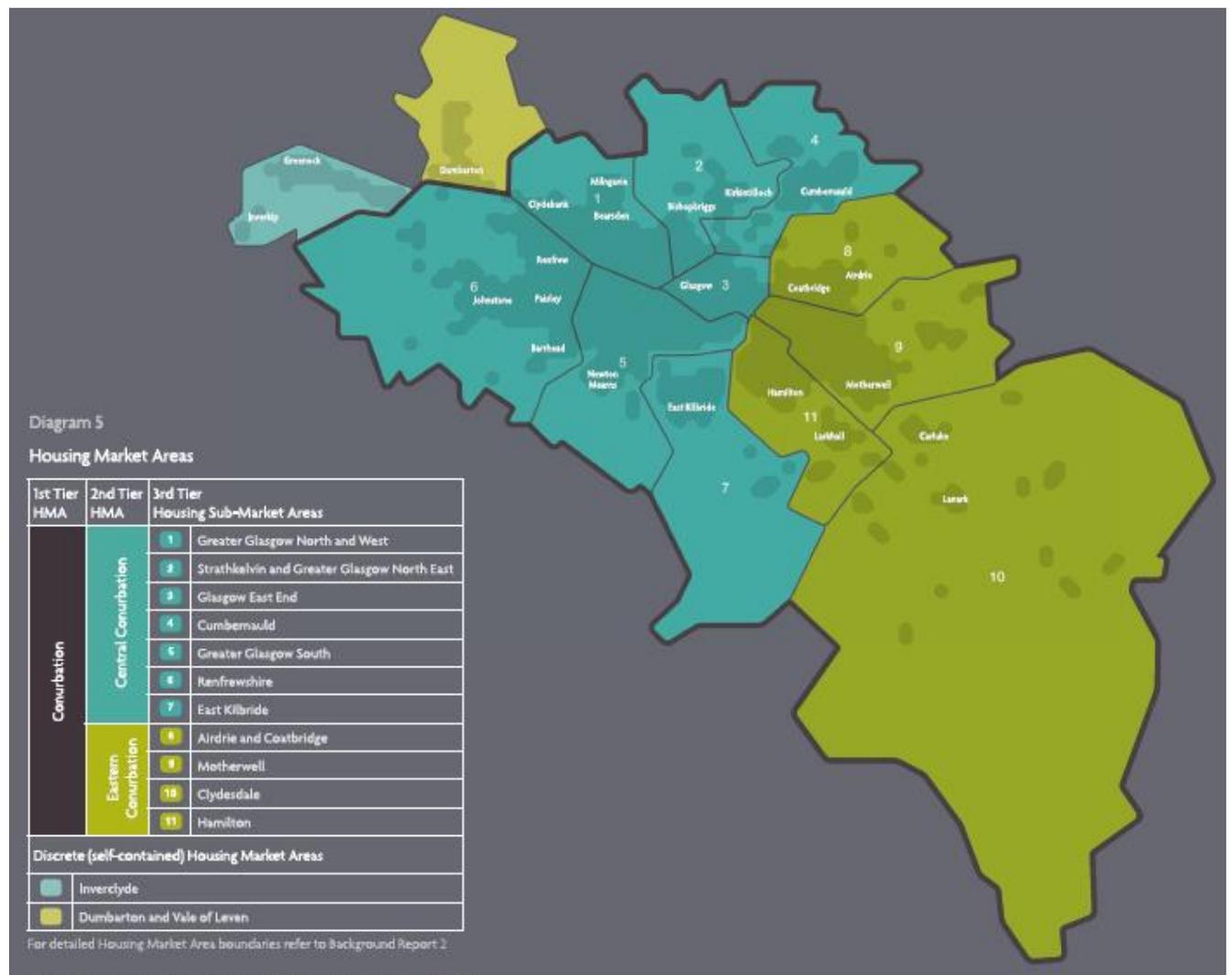


Figure 1

Approach to Meeting the Housing Market Sub Area Target

In addition to the all tenure Housing Land Requirement by Local Authority area, Policy 8 of the adopted Clydeplan SDP requires Local Authorities to make provisions in their LDP's that contributes towards meeting the Private Housing Land Requirement by Housing Sub Market Area. This requirement applies only to the private sector housing given that private demand is more mobile, and reflecting the way in which affordable housing is funded, delivered and allocated (usually within local authority boundaries).

The purpose of the tiered approach is to fully understand the nature of housing need and demand in the city region and to enable housing need to be met in a way that meets the spatial strategy. It should be noted that Schedule 9 in Policy 8 does not make reference to separate targets within the constituent parts of the 3rd Tier. The Housing Market Sub Area target should as such be applied across the whole of the HMSA.

Both of the HMSA's relating to East Dunbartonshire contain major regeneration projects and/or Community Growth Areas the development of which are vital in ensuring the success of the spatial strategy. Major housing releases out with the areas currently allocated for new development are likely to undermine the delivery in priority areas for each respective HMSA.

Through the work of Clydeplan and the eight constituent authorities the land supply across of all of the market areas, tiers and authority areas is monitored and reported in the annual Housing Land Monitoring Report. Each monitoring report is prepared once all eight authorities have finalised their Housing Land Audits and the data is collated and analysed to provide a comprehensive picture of the progress being made across the city region in delivering the Strategic Development Plan housing targets.

Table 6 below sets out the current established land supply in the Greater Glasgow North West HMSA, based on the 2019 HLA's of the respective Local Authorities, and demonstrates that a sufficient supply of land is being maintained.

Table 6 – Greater Glasgow North West HSMA Private Housing Supply

	2012 - 2029
SDP Housing Land Requirement	11,100
Minus Completions 2012 - 2019	1,823
Remaining Housing Supply Target	9,277
2019 Established Housing Land Supply	12,880
Surplus/ Shortfall	+1,780

The Greater Glasgow North west HMSA includes the following significant brownfield/ regeneration developments:

- Cable Depot Road, West Dunbartonshire
- Cowlairs/ East Keppoch, City of Glasgow
- Drumchapel (various sites), City of Glasgow
- Glasgow Harbour, City of Glasgow
- Kilmardinny (partial brownfield), East Dunbartonshire

- Hamiltonhill (various sites), City of Glasgow
- Maryhill Transformational Regeneration Area, City of Glasgow
- Queens Quay, West Dunbartonshire
- Ruchill Hospital, City of Glasgow
- Stanford Street (various sites), West Dunbartonshire
- Summerston (potential development area), City of Glasgow

As there is particular pressure in the Greater Glasgow North West HMSA, officers are working with colleagues within the relevant neighbouring authorities, in addition to the normal activities of the Housing Market Partnership, to ensure that there is a robust and coordinated approach to housing land in the relevant areas. This work is ongoing and where appropriate additional technical and/ or background information may be published to supplement the annual Housing Land Monitoring Report. Note that this work may require the information in this section of this report to be updated.

Table 7 below sets out the current established land supply in the Strathkelvin and Greater Glasgow North East HMSA, based on the 2019 HLA's of the respective Local Authorities, and demonstrates that a sufficient supply of land is being maintained.

Table 7 - Strathkelvin and Greater Glasgow North East HMSA Private Housing Supply

	2012 - 2029
SDP Housing Land Requirement	4,340
Minus Completions 2012 - 2019	1,590
Remaining Housing Supply Target	2,750
Established 2019 Housing Land Supply	4,244
Surplus/ Shortfall	+1,494

The Strathkelvin and Greater Glasgow North East HMSA includes the following significant brownfield/ regeneration redevelopments:

- Lennox Castle Hospital, East Dunbartonshire
- Red Road/ Barmulloch Transformational Regeneration Area, City of Glasgow
- Robroyston Community Growth Area, City of Glasgow
- Sighthill Transformational Regeneration Area, City of Glasgow
- Springburn (various sites), City of Glasgow
- Standburn/ Wallacewell Road, City of Glasgow
- Twechar (various sites), East Dunbartonshire

As detailed above the Clydeplan authorities approach is to meet the targets in the SDP across the Housing Market Sub Areas as a whole. However, in order to demonstrate an indicative land supply within the East Dunbartonshire portions of the Greater Glasgow North West and Strathkelvin and Greater Glasgow North East HMSA's, the table below is provided.

Table 8 – Indicative Private Housing Land Supply by Local Authority Sub Area (For illustrative purposes only)

	Private Supply		
	Bearsden & Milngavie	Strathkelvin	East Dunbartonshire Total
<i>Period 1 – 2012 - 2024</i>	536	1,072	1,608
<i>Period 2 – 2025 - 2032</i>	13	19	32
<i>Whole Plan – 2012 - 2032</i>	549	1,091	1,640
<i>Period 2025 – 2032: Based on Clydeplan Strategic Development Plan 2017 (Extended from 2029 to 2032)</i>			
<i>Minus Completions (2012 – 2019)</i>	445	1,344	1,789
<i>Equals</i>	104	-253 <i>(Target exceeded)</i>	-149 <i>(Target exceeded)</i>
<i>Plus 15% Generosity</i>	16	N/A	N/A
EQUALS HOUSING LAND REQUIREMENT	120	N/A	N/A
Existing Supply (Housing Land Audit 2019)			
	395	1,215	1,610
<i>Surplus/ Shortfall</i>	+275	+1,215	+1,610

In their response to the Main Issues Report Homes for Scotland and a number of developers stated that the Council's preferred option was not in compliance with the Strategic Development Plan as it did not break the Housing Land Requirement and supply down to Housing Market Sub Areas (HMSA). Particularly, they contended that there was a shortfall in the supply of housing land across the Greater Glasgow North West HMSA and consequently that LDP2 should make additional allocations for housing in the Bearsden and Milngavie area through the release of greenbelt land. The Council does not agree with this position for the reasons as set out above.

3. Meeting and Augmenting the Housing Land Requirement

New Allocations Approach in Local Development Plan 2

Scottish Planning Policy (SPP) requires Local Development Plans to meet the Housing Land Requirement in full. Table 5 above demonstrates that the Housing Land Requirement can be met from existing land allocations that are yet to be fully developed.

The Proposed LDP2 allocates 15 new sites for housing development utilising brownfield land in addition to the current housing land supply. The current supply, as measured by the Housing Land Audit 2019, includes sites carried over from LDP1 that have not yet been completed and windfall sites that were not included within LDP1 but have achieved planning consent since the plan was adopted (note that six windfall sites from the Housing Land Audit 2019 were assessed as part of the site assessment process, see page 24).

All of the new sites that have been included within the Proposed LDP2 for allocation were submitted to the Council during the Call for Sites stage, and were subject to detailed site assessment and consultation at the Main Issues Report stage (see Appendix 1 'Sites not included in the Proposed Local Development Plan 2' for information on this process). The sites allocated within the LDP have been selected as they fit with the Council's approach set out in Policy 1 'The East Dunbartonshire Development Strategy.'

By allocating new sites, the Council has provided additional generosity to the existing land allocations in line with the SDP 2017 and LDP2 Policy 1 – East Dunbartonshire Development Strategy in order to:

- Provide additional affordable housing units to the benefit of the Housing Service's delivery programme;
- Redevelop vacant and derelict sites, that may suitable for new housing, to reduce impact and harm upon local communities.

Further detail on the approach to allocating new sites is provided in the sections below.

Local Need for Affordable Housing

As discussed above the adopted Local Housing Strategy (LHS) amended the targets in the adopted Strategic Development Plan to reflect the additional funding announcement by the Scottish Government in 2015 and based on local evidence of need. This is reflected in the Housing Land Requirement above.

The Council maintains a housing waiting list (known as the Common Housing Register) which is used to allocate Council and other affordable housing properties to households in need of social housing. The list gives a rough indication of the scale of local demand for affordable housing, however it should be noted that there are no restrictions for joining and that not everyone on the list would be eligible for affordable housing, regardless of supply.

There is relatively little difference in the total number of applicants on the current list than 10 years ago, with 3,526 applicants on the list at the end of the 2009 reporting period and 3,687 in 2018.

However the numbers have fluctuated in that time reaching a peak of 4,832 in 2016. The number of new applicants on the list has reduced from 1,363 in 2014 to 995 in 2018 which may reflect the wider but modest improvements in the economy. Affordable housing completions data shows that an average of 86 new affordable units have been built every year in the last 10 years. Programming from the 2019 Housing Land Audit shows that an average 122 units will be completed per year over the next 5 years (as the Affordable Housing Supply Programme funding announced in 2015 begins to bear fruit). It is expected that this will have a positive impact in terms of reducing the waiting list.

The Scottish Government has identified tackling homelessness as a key priority and is a fundamental component in tackling poverty and inequality. Therefore addressing homelessness is a core element of the Local Housing Strategy 2017. The LHS states that currently more than half of the Council's lets are typically allocated to homeless applicants. Despite visible progress, continued action is required to ensure that the Council fulfils its obligations regarding the housing of homeless households. With the introduction of the Rapid Rehousing Scheme, where the time homeless applicants spend in temporary accommodation requires to be significantly reduced, the need to allocate a significant proportion of affordable lets to homeless applicants will continue.

Therefore, although the existing land supply exceeds the Housing Land Requirement, the level of surplus is small in comparison to the private sector surplus and the modest allocation of additional sites in the Proposed Plan will ensure a programme of new affordable housebuilding beyond the next 5 years.

It should also be noted that there are a number of initiatives through which affordable housing need can be met and that new build housing isn't the only way in which the supply can be increased as set out in the Local Housing Strategy. In addition, the Council has recently purchased a number of pre-existing properties on the private market in order to increase its stock and will continue to pursue alternative methods in addition to new build housing.

Focussing on Re-using Brownfield Land

The volume of brownfield land in East Dunbartonshire is low compared to the rest of the city region but the redevelopment of what brownfield land we do have is a priority. Vacant land does not contribute to successful communities as it is unproductive and can be unattractive or pose a safety risk. It should be noted that brownfield land can become biodiversity rich and the mitigation of this should be part of any redevelopment. In order to ensure that all our brownfield land is productive and can be best utilised to improve communities, officers have surveyed it through the following work:

- Review of Communities' regeneration and development projects, including those affecting brownfield land – see list of projects in communities sections of the Monitoring Statement
- Internal 'Call for Sites' and discussions with Corporate Assets and Estates Management – Surplus Council sites have been considered through discussions with other services. In addition, the Housing Service carried out a survey for potential sites within their ownership and worked with Estates Management to identify opportunities.
- Vacant and Derelict Land Audit – This annual audit for the Strategic Development Plan identifies all vacant and derelict land over 0.1 hectares.
- Business Land Review and Audit – This has considered all vacant land on our business sites and identified the potential for mixed use development (potentially including housing) on some business sites in order to facilitate the development of long-standing vacant land.

- Urban Capacity Study – This Study was commissioned to ensure that any other areas of vacant land, beyond those identified by the above work, is known to the Council. The study has assessed the existing urban areas for the extent of land with development potential, and the potential reuse of existing vacant buildings for housing. The study has identified that vacant land and buildings in East Dunbartonshire have the potential to provide between 162 and 320 housing units. It should be noted that not all of these sites are new sites, some had already been considered by the Council (see Monitoring Statement Appendix 8 Site Assessment). Although this Study has not yielded many new sites, it does demonstrate that the Council is aware of the majority of opportunities for brownfield regeneration. However, the Urban Capacity Study is a point in time and as land uses change new opportunities for housing are likely to arise during the life of the plan (please see windfall section below).

These pieces of work have demonstrated that there are brownfield sites with potential for development and these have been included in the Proposed LDP.

Site Allocation Criteria

In addition to prioritising brownfield land for development, the following land issues were considered in developing site allocation criteria and identifying new sites.

Greenbelt and Greenfield Protection

The Council has a long-standing development strategy of supporting regeneration by prioritising the use of sustainably located brownfield land over greenfield release. This reflects the policy approach of a compact city region and the range of natural and historic environment designations within East Dunbartonshire's green belt. Scottish Planning Policy states that a green belt can support a development plan spatial strategy by: directing development to the most appropriate locations and supporting regeneration; protecting and enhancing the character, landscape setting and identity of the settlement; and protecting and providing access to open space.

A Green Belt Boundary Review (Monitoring Statement Appendix 10) was carried out and recommended, with significance to housing land, that minimal revisions to the boundary should be made. These findings have been taken into account in assessing individual sites and as part of the criteria for each site package.

Greenfield land forms a strong part of the identity and attractiveness of East Dunbartonshire. However, if greenfield releases are required to meet housing need this must be through a controlled process that does not undermine the strategic aims of the greenbelt, where impacts are limited and where new defensible boundaries can be created. Greenbelt is particularly important in the distinction of settlements to communities in creating sense of place and local identity:

- Bearsden and Glasgow
- Bearsden and Milngavie (Craigdhu Wedge)
- Bishopbriggs and Glasgow
- Bishopbriggs and Lenzie
- Lenzie and Auchinloch
- Waterside and Kirkintilloch

The sections of the Bishopbriggs Relief Road that have been completed so far provide a strong defensible and logical edge to the southeastern part of Bishopbriggs, which has accommodated new development in the last 15 years. The proposed route for the future phases of the road has the potential to create a new defined edge for the northeastern part of Bishopbriggs and therefore subsequently could provide some additional land for development.

Historic Environment

The Antonine Wall World Heritage Site and Buffer is a significant resource and requires protection. Although some limited development within the buffer zone may be appropriate, particularly on the fringes, any new sites would have to be carefully considered for their impact upon the setting of the Antonine Wall. However, within the majority of the buffer new development would be inappropriate. The buffer extends from Twechar in the east to Bearsden in the west and is adjacent to parts of Kirkintilloch, Torrance, Bishopbriggs, Balmore and Bardowie.

In addition to the Antonine Wall World Heritage Site, it is important to ensure that East Dunbartonshire's wider heritage assets are protective from inappropriate development. Development that would have an adverse impact upon Scheduled Ancient Monuments, Listed Buildings and their settings, Conservation Areas, or Nationally or Locally Important Garden and Designed Landscapes should be avoided. New development must protect and enhance heritage assets, the appropriateness of which must be determined on a case by case basis in line with Policy 19 Historic Environment.

Natural Environment and Open Space

East Dunbartonshire has a rich local biodiversity. The land surrounding East Dunbartonshire's settlements includes a number of natural environment designations. In particular, there are a number of SSSIs, Local Nature Reserves and Local Nature Conversation Sites. Development on these sites is considered to be inappropriate. East Dunbartonshire has a number of Local Landscape Areas Landscape that also pose a constraint on development. New development would be inappropriate on the upland areas of the Kilpatrick Hills and Campsie Hills. The Craigmaddie/ Blairskaith Local Landscape Area is also particularly sensitive.

In addition to the designations above, development on sites which contain priority habitats on the Scottish Biodiversity List or in the Local Biodiversity Action Plan should be avoided to protect local biodiversity. New development should enhance the habitat of the green network and development which results in the fragmentation of the green network and/ or it's access links would be considered as inappropriate.

The flood plains of East Dunbartonshire's rivers and streams restrict available land for development. Significant flood events have occurred in the River Kelvin catchment area in the past. Scottish Planning Policy prevents development on flood plains and SEPA are increasingly taking to steps to ensure development has significant protection. The impact of climate change on flood risk has also been considered in producing the Proposed Plan. The flood plain restricts the amount of developable land to north of Twechar and Kirkintilloch, to the east of Milton of Campsie, to the south of Lennoxton, to the south of Torrance, Balmore and Bardowie and to the east of Bearsden and Milngavie.

East Dunbartonshire contains a number of areas where the soil quality requires to be protected and to ensure that these resources are maintained. New development on deep peat and carbon rich soils should be avoided. Development on prime quality agricultural land would also be inappropriate.

Open spaces located within and around the established urban areas of East Dunbartonshire contribute significantly to the health and wellbeing of communities through providing opportunities for exercise and recreation, and by enhancing the character and appearance of places. New development that would result in an adverse impact upon the functionality and/ or appearance of open spaces would be inappropriate in the Proposed Plan.

Accessibility

SPP recognises that land use planning and transport are highly interlinked and new development is expected to promote sustainable and active travel. SPP requires the spatial strategies set out in development plans to support new development in locations that allow walkable access to local amenities and are also accessible by cycling and public transport.

A Transport and Air Quality Appraisal has been undertaken and is provided within Monitoring Statement Appendix 7 Site Assessments. The appraisal supports the Proposed Plan site selection process by understanding the impacts of each proposed site and the potential mitigation measures required to ensure that new development in East Dunbartonshire facilitates sustainable travel patterns which improve local health and air quality. For each site contained within the Site Assessments the appraisal considers access to: bus routes, train stations, local services and town/ village centres, core paths and impact upon Air Quality Management Areas. Where appropriate, key markers such as distance from the site to transport infrastructure or regularity of service are considered, however this is balanced against the scale of the development. The impact of development on transport projects/ land safeguarding is also taken into account. The appraisal then sets out whether the development would have a minimal, moderate or significant impact upon air quality and any potential mitigation measures that would be required should the development be progressed.

In allocating the sites suitable for development within the Proposed Plan, the results of the Transport and Air Quality Appraisal requires in some cases to be balanced against other factors such as the development of brownfield land and the impact that this has upon the health and wellbeing of communities.

Hazardous Installations and Potential Contamination

East Dunbartonshire contains a number of hazardous installations including high-pressure gas pipelines, a chlorine storage area, bonded warehouses and an explosives factory. New development must not have an adverse impact upon these installations and any proposals within established buffer zones will be considered for compatibility, which may result in the site being deemed inappropriate for new housing development.

Whilst the regeneration and reuse of brownfield land is a priority in the spatial strategy, brownfield land can often contain contamination as a result of previous uses. In most case potential contamination will be capable of appropriate and safe remediation however where this is not possible allocation of the site for new development would not be appropriate.

Impact on land for business and employment uses

Whilst East Dunbartonshire has a diverse local economy, its geographical location means that it is at a somewhat disadvantage for attracting business growth compared to other parts of the Glasgow city region, and many residents commute out of the authority area to work. The growth of suburban commuter areas is not sustainable over the long term, and can lead to increasing wealth inequality due to a lack of local job opportunities. Planning plays an important role in facilitating new business development by ensuring that site and locational challenges are overcome and that the area is as attractive for new investment as possible. The Local Development Plan therefore protects land in various locations across East Dunbartonshire for new business development, and, together with the Economic Development Strategy, includes actions to improve the attractiveness of the area for business investment, such as the Westerhill Regeneration Area as part of City Deal and associated infrastructure improvements.

The Local Development Plan also seeks to ensure that brownfield land is used productively and many of the sites in East Dunbartonshire that are currently vacant or derelict are designated as business and employment land.

Analysis of business land carried out in the Business Land Review and Audit (Monitoring Statement Appendix 1 and 2) demonstrates that the majority of existing business sites in East Dunbartonshire should be maintained to ensure that there is a sufficient supply to address the challenges discussed above. However, a limited number of sites should be considered for a mix of uses to enable vacant land to be developed whilst continuing to enable business development and deliver the aims of the Economic Development Strategy. The sites considered in the Business Land Review and Audit to have potential for other uses (where housing is identified) are:

- Westerhill – requires a masterplan for the area to include business, housing, transport, utilities and green infrastructure as part of a wider expansion of the Westerhill regeneration area.
- Tom Johnstone House / Whitegates Industrial Estate – Continue to protect in Local Development Plan for mixed-use development including business use and require a joint approach across the site to deliver business and housing.
- Kirkintilloch Gateway – Continue to protect in Local Development Plan for mixed-use development including business use and require a joint approach across the site to deliver business, housing, transport, utilities and green infrastructure. Feasibility of housing suitability on the site to be considered.

Therefore the Proposed Plan seeks to allow the limited and controlled use of existing business land for new housing where this will help to facilitate the development of new business uses. Additionally, as housing is a land use which is more sensitive to amenity issues such as noise and light, new housing will only be acceptable where it is considered to be compatible with existing and future business uses, and not result in pressure for operating restrictions to be imposed to the nearby businesses.

Note that planning applications have been considered by the Council for the Tom Johnstone and Whitegates Industrial Estate sites and that this is reflected in the new allocations for Local Development Plan 2.

Out with the locations listed above, new housing development that would compromise the ability of existing or future businesses to provide full time employment, either by removing or reducing the land available, or by virtue of proximity and the potential pressure for operating restrictions as a result of amenity issues, should be avoided.

Impact on Community Facilities

Community facilities and services have a fundamental role to play in creating/ maintaining vibrant, healthy and happy communities. Scottish Planning Policy recognises the importance of the planning process in ensuring that communities have access to good quality amenities and services. Planning regulations and policy are clear that if there are potential capacity issues on local services and/ or infrastructure as a result of new development then these should be addressed by increasing provision through developer contributions and that refusing planning applications is a last resort.

A Community Facilities Assessment has been undertaken and is provided within Monitoring Statement Appendix 7 Site Assessments. The assessment has concluded that the impact of new housing development on the capacity of community facilities can be managed through suitable mitigation measures and developer contributions in line with the expectations of Scottish Planning Policy, subject to the scale of land allocations made within Local Development Plan 2. Policy 24 Developer Contributions and Appendix 3 of the Proposed Plan set out requirements for ensuring that new development does not adversely impact upon existing infrastructure.

Regarding capacity or potential to absorb the impact of new housing on community facilities, there is however one exception where mitigation measures and developer contributions are currently not suitable. Work is underway to increase the capacity of Killermont Primary by means of a physical extension to the building. Once the extension is complete the school, even after extension, is projected to remain at near capacity for the medium term and it is considered at this time that a further extension to the school building would be impractical.

Combined Site Allocation Criteria

Pulling together the constraints listed above with national policy, the requirements of the Strategic Development Plan and other relevant factors, the new allocations within the Proposed Plan as shown in Table 8 below satisfy all of the following criteria:

- 1A. Compatible with the amenity of existing or proposed surrounding use
- 1B. Re-use of brownfield, vacant and/or derelict land sites within existing settlement boundaries (and which may include the re-use of an existing building)
- 1C. Access to frequent (every 15 minutes, throughout the day) Public Transport (bus stops, rail stations) within 400m walk via safe, well-lit and all weather routes
- 1D. Access to Active Travel routes (core path, cycle network, walking, cycling) to town/ village and commercial centres or services and facilities; within 400m walk via safe, well-lit and all weather routes
- 1E. Access to town/village centre and/or commercial centre by walking, cycling and public transport; to minimise the need to travel by private transport to services
- 1F. No adverse environmental constraints or impacts that cannot be avoided or mitigated
- 1G. Will not negatively impact designated permanent or Full Time Equivalent employment and/or well-established and active business enterprise either on or proximate to the site.

List of Sites Allocated in Local Development Plan 2

Using criterion 1A – 1G above the following sites set out in Table 9 below are allocated for new housing development in Local Development Plan 2.

Table 9 - Proposed Plan New Housing Allocations

Reference	Site	Settlement	Proposed Use	Affordable ¹	Private ¹	Total ¹
2.F8	Nithsdale Crescent	Bearsden	Housing	26	0	26
2.F6	190 – 196 Milngavie Road	Bearsden	housing, retail	6	19	25
3.H1	Former Auchinairn Primary School, Beech Road	Bishopbriggs	Housing	10	30	40
3.H2	Former High School Site	Bishopbriggs	Housing	24 ²	50 ²	74 ²
3.H6	Westerhill Regeneration Area	Bishopbriggs	Mixed use development including business and housing.	TBC	TBC	TBC
4.H20	Merkland School	Kirkintilloch	Housing	10	30	40
4.H15	Kirkintilloch Gateway Regeneration Area	Kirkintilloch	Mixed use development	TBC	TBC	TBC
4.H25	Former Tom Johnston House	Kirkintilloch	Housing	87	0	87
4.H27	Whitegates	Kirkintilloch	Housing and Business	21	63	84
4.H5	Campsie View School	Lenzie	Housing	7	21	28
4.H18	Former Lenzie Primary School	Lenzie	Housing	5 ³	15 ³	20 ³
4.H21	Moss Road	Waterside, Kirkintilloch	Housing	8	0	8
5.G8	St Machan's Way	Lennoxton	Housing	2	0	2
5.F3	Drumclog Avenue	Milngavie	Housing	0	2	2
7.D3	East of Ferrymill Motors	Torrance	housing	8	25	33
Total				214	255	469

¹ The capacities set above are indicative only for the purposes of calculating housing land supply and do not prejudice the assessment and final outcome.

² The figure shown above is additional capacity to current LDP allocation Ref 6.17 for 46 units.

³ Site has planning consent (TP/ED/18/0378) but granted too late to be included with the 2019 Draft Housing Land Audit and is therefore shown as a new allocation in order to include the capacity in the supply.

The remaining sites that were promoted by landowners and developers have not been included as new LDP2 sites and are therefore not included in the Proposed Plan. These sites are considered to be unreasonable in terms of the Council's approach to land allocation as outlined at the start of section 3. These sites are split into two further packages: Those sites which are consistent with the alternative criteria set out at the Main Issues Report stage and possessing moderate constraints (note this package has expanded since the Main Issues Report was published); and those sites which are considered unsuitable for new housing development. Both packages of sites are set out in Appendix 1 – Sites not included in the Proposed Local Development Plan 2.

As discussed on page 15, six windfall sites from the Housing Land Audit 2019 were assessed for fit with the Proposed Plan strategy in addition to the sites that had been suggested by landowners and developers. These sites are S371 Kilsyth Road, S372 Main Street South, S378 Craigton Works, S379 Wester Gadloch Farm, S380 Netherton Farm Lane and S381 Saddler's Brae Farmhouse. Four of the sites had gained planning consent since the preparation of the current Local Development Plan (S378, S379, S380 & S381) but were neither under construction or had demonstrated significant process towards delivery. Two of the sites were allocated within the Strategic Housing Investment Plan and had been considered as appropriate for inclusion within the Housing Land Audit (S371 & S372).

Three of the six sites: S371 Kilsyth Road, S372 Main Street South and S380 Netherton Farm Lane have been deemed to fit with the proposed strategy and therefore have been included within the Proposed Plan. The remaining three sites: S378 Craigton Works, S379 Wester Gadloch Farm and S381 Saddler's Brae Farmhouse were not considered to comply fully with the Proposed Plan strategy and have not been allocated (see Appendix 1 'Sites not included in the Proposed Local Development Plan 2).

Further information on all of the sites that have been assessed as part of the Proposed Plan process is set out in Monitoring Statement Appendix 8: Site Assessments.

Range of Sites

Paragraph 119 of Scottish Planning Policy (SPP) states that local development plans should allocate a range of sites in a variety of locations. The housing sites in the Proposed Plan includes new site allocations and sites carried over from the current Local Development. The Council's strategy for new allocations has focussed on the reuse of brownfield land. As previously discussed the volume of vacant and derelict land in East Dunbartonshire is limited compared to other parts of the city region. However, the redevelopment of what brownfield land does exist in East Dunbartonshire is a priority for development as vacant land does not contribute to successful communities. The majority of vacant and derelict land is contained within the Strathkelvin part of the Council area and consequently 12 of the 15 new housing sites are located here. However, given the sites carried over from the current Local Development Plan the Proposed Plan contains 9 sites of varying sizes and types that are not under construction in Bearsden and Milngavie.

The Proposed Plan is considered to allocate a broad range of sites and provides the following in terms of different allocations:

- Site Size and Capacity – The plan contains a range of different sizes of sites. There are 19 sites of 10 units or less which are likely to appeal to small and medium housebuilders and

affordable housing. Conversely, there are 19 major sites of 50 units or more that are likely to be developed by national housebuilders (or in some cases the Council for affordable housing).

- Urban locations - The Council's strategy focusses on developing sites that are in urban locations and in the most sustainable locations, this includes all of the towns in East Dunbartonshire.
- Rural Regeneration Areas – Despite the strategy focus on sustainable locations there is an appropriate volume of allocations in East Dunbartonshire's more rural areas, particularly in and around the villages of Lennoxton and Twechar to aid regeneration and address population decline.
- Regeneration Masterplan Areas:
 - Westerhill – Housing is allocated as an element of a wider mixed use masterplan for the Westerhill area. This will enable development of a brownfield site and provide additional housing units to the total provided by the new allocations.
 - Kirkintilloch Gateway – Housing is allocated as an element of a wider mixed use masterplan for the Kirkintilloch Gateway area. This will enable development of a brownfield site and provide additional housing units to the total provided by the new allocations.

Some of the representations to the Main Issues Report from the development industry stated that for LDP 2 to comply with SPP in providing a range of sites, a number of new allocations on greenfield land would be required and that the strategy of focussing on brownfield land would not satisfy this. The Council does not agree with this assertion and as outlined above it is considered that the Proposed Plan allocates a range of sites as required by SPP.

Effectiveness of Sites

Requirements of Scottish Planning Policy

Scottish Planning Policy (SPP) states that Local Development Plans should allocate a range of sites which are effective or expected to become effective in the plan period. Sites are considered to be effective where it can be demonstrated that they will be free of constraints within 5 years and can be developed for housing. Where actions may be required to address possible constraints and make sites effective these should be set out in the Action Programme which accompanies the LDP. SPP does not expect all sites which are allocated in LDP's to be immediately effective.

SPP requires Planning Authorities to maintain a 5 year effective housing land supply at all times and the contribution of the LDP in achieving this goal is allocating a sufficient supply of land for new housing which meets the Housing Land Requirement (which includes generosity). The day to day effectiveness of the supply is monitored and measured through the Housing Land Audit process. Ultimately, with the exception of new affordable homes built by the Council, the authority has no control over the rate of housing delivery and can only ensure that enough land is allocated.

Deliverability of sites carried forward from LDP1

In preparing Local Development Plan 2 the Council re-assessed 'legacy' sites that have been allocated since Local Plan 2 (adopted in 2011) and where, compared to other allocated sites, less

evidence of the site progressing for new housing has been observed. The following sites have therefore been assessed as part of the site assessment process alongside new sites (see Monitoring Statement Appendix 8 Site Assessments). The outcome in each case is as follows (with existing Local Development Plan reference numbers):

- 6.27 Thomas Muir Avenue, Bishopbriggs - **deallocated**
- 6.46 Meadowburn Avenue, Lenzie - **retained**
- 6.56 Lennox Castle Hospital (Phase 3 & 4), Lennoxtown - **retained**
- 6.57 Lennox Castle (listed building), Lennoxtown - **deallocated**
- 6.41 Glen Shirva Road, Twechar - **retained**
- 6.45 MacDonald Crescent, Twechar - **retained**

The Council has also deallocated the Crofthead site in Bishopbriggs to reflect the refusal of planning application TP/ED/18/0872, where the reasons for refusal were considered to be insurmountable and that compliance with the requirements of LDP policy could not be achieved. The decision was appealed by the applicant and has subsequently been dismissed by the Reporter who found in favour of the Council's decision on 26 February 2020 (appeal reference PPA-200-2055).

With regards to the sites that have been retained, where action is required to ensure that the site is capable of being delivered during the lifetime of LDP2 this is addressed in the Delivery Programme also published alongside the Proposed Local Development Plan.

Deliverability of sites newly allocated in LDP2

During the Main Issues Report consultation Homes for Scotland and some of their members raised concerns about the deliverability of the proposed new sites in the preferred option. Pointing out specifically that only 1 of 25 proposed new allocations had a Homes for Scotland member attached and questioning if the sites will indeed be developed in the future. Therefore, they asserted that this was contrary to the requirements of Scottish Planning Policy (SPP).

As discussed above the requirements of SPP are clear that sites should either be effective at the point of adoption of the LDP, or be capable of becoming effective during the plan period. Therefore, it would not be expected that all of the sites proposed for development would be actively progressed by a specific housing developer at this stage. Additionally, whilst it is accepted that Homes for Scotland members build the vast majority of new homes in East Dunbartonshire they do not represent all house-builders, particularly small-scale builders who are more likely to take on small developments within established built-up areas. It is also important to note that the Local Development Plan is expected to be adopted in early 2022 and that work to prepare and/ or promote each site for development could progress further in the time leading up to adoption.

Whilst deliverability of sites has been taken into account in the preparation of the plan, this must be balanced alongside the spatial strategy of directing development to brownfield land in the most sustainable locations. Previous experience has shown that developers can pay particular attention to promoting greenfield sites, which are generally perceived to be easier to develop, during the preparation of the Local Development Plan but that it does not stop the take-up brownfield sites during the plan period. Recent example of sites which have been allocated in past development plans without a named developer attached but are now being developed by a national housebuilder

include Former Sewage Works at Cadder/ Jellyhill, Former Bishopbriggs High School and former Broomhill Hospital.

It should also be noted that 4 of the sites newly allocated in the Proposed Local Development Plan 2 are for the development of 100% affordable housing by the Council and therefore the Homes for Scotland membership status of the site promoter is not relevant in any event. The Site Assessments conducted as part of the process to allocate sites has considered the possible constraints for each site and the ability of any identified constraints to be overcome in line with the requirements of Scottish Planning Policy. Additionally, feasibility work on the development potential of each of the Council affordable housing sites has been undertaken by the Housing Development Team. As a result of this work two sites that were included within the Main Issues Report preferred option have not been carried forward to the Proposed Plan as they have been deemed likely to be unviable (see Appendix 1 of this report 'Sites not included within Proposed Local Development Plan 2' for further information).

Table 10 below sets out indicative timescales for each of the new sites allocated in the Proposed Plan demonstrating when within the plan period they are likely to be developed.

Table 10 - LDP2 New Allocations - Indicative Timescales for Development

Ref	Site	Indicative Timescales	Potential Constraints or Other Considerations Affecting Short-Term Effectiveness
2.F8	Nithsdale Crescent	Short/ Medium-term	Completion of Compulsory Purchase Order (in process)
2.F6	190 – 196 Milngavie Road	Short/ Medium-term	None
3.H1	Former Auchinairn Primary School, Beech Road	Short-term	None
3.H2	Former High School Site	Short-term	None
3.H6	Westerhill Regeneration Area	Medium/ Long-term	<ul style="list-style-type: none"> • Masterplanning process to determine full extent of land suitable for development. • Environmental constraints requiring additional work and/ or mitigation.
4.H20	Merkland School	Long-term	Delivery of new Additional Support Needs School required.
4.H15	Kirkintilloch Gateway Regeneration Area	Medium/ Long-term	<ul style="list-style-type: none"> • Masterplanning process to determine full extent of land suitable for development. • Possible environmental constraints requiring additional work and/ or mitigation.
4.H25	Former Tom Johnston House	Short-term	None
4.H27	Whitegates	Short-term	None
4.H5	Campsie View School	Long-term	Delivery of new Additional Support Needs School required.

Ref	Site	Indicative Timescales	Potential Constraints or Other Considerations Affecting Short-Term Effectiveness
4.H18	Former Lenzie Primary School	Short-term	None
4.H21	Moss Road	Medium-term	None
5.G8	St Machan's Way	Medium-term	None
5.F3	Drumclog Avenue	Short-term	None
7.D3	East of Ferrymill Motors	Medium-term	None

Contribution of Windfall Development

Scottish Planning Policy (SPP) lists windfall as a possible source of sites to contribute towards meeting the Housing Land Requirement in the Local Development Plan. SPP defines windfall development as 'sites which become available for development unexpectedly during the life of the development plan and so are not identified individually in the plan' and 'that any assessment of the expected contribution to the Housing Land Requirement must be realistic and based on clear evidence of past completions.' The following table sets out the total number of windfall units constructed in East Dunbartonshire in each year over the last 10 years and provides a 10 year average.

Table 11 – Windfall Housing Units Constructed 2009 - 2019

Year	Affordable		Private		All Tenure Total	
	Units	% of Completions	Units	% of Completions	Units	% of Completions
2009 - 2010	0	0%	25	86%	25	20%
2010 - 2011	0	0%	25	27%	25	15%
2011 - 2012	0	0%	5	3%	5	2%
2012 - 2013	0	0%	22	9%	22	5%
2013 - 2014	19	18%	45	15%	64	16%
2014 - 2015	59	50%	29	12%	88	24%
2015 - 2016	28	34%	79	25%	107	27%
2016 - 2017	0	0%	35	12%	35	10%
2017 - 2018	0	0%	7	3%	7	3%
2018 - 2019	0	0%	50	23%	50	20%
Total 10 Year	106		322		428	
Yearly Average	10.6		32.2		42.8	

Notes:

1. The calculations above include all completions from developments that achieved consent as windfall.
2. The table only includes units completed on sites monitored by the Housing Land Audit i.e. where the total capacity is 4 units or more.
3. The '% of Completions' column details the percentage of the overall completions built for that year that were arising from windfall (i.e. the remaining percentage of completions is from sites allocated in the development plan).

Scottish Planning Policy states that windfall calculations must be based on clear evidence of past completions but also on sound assumptions about likely future trends. The table above shows that over the last 10 years an average of approximately 43 windfall units have been built per year. This figure mirrors the 42 unit windfall allowance contained within the current Local Development Plan and demonstrates that new windfall development is thus far keeping up with the expected rate in the LDP. The windfall units delivered in the last 10 years have been on sites within the urban area where dynamic changes in land use have taken place. The Council considers that these changes in land use are very likely to continue, particularly as the economic impact of the Covid-19 outbreak manifests.

It should be noted that the Westerhill and Kirkintilloch Gateway Regeneration Areas will include the delivery of new housing. However as further work is required through a masterplan approach to determine the extent of land suitable for housing, Local Development Plan 2 does not include an indicative capacity for either of these sites. This will therefore further bolster the number of housing units currently identified in the supply.

It should also be noted that as the windfall allowance is calculated using completions there is a time lag between the granting of windfall consents and new units being recorded in the table above. Since preparing the current Local Development Plan there appears to be an upturn in the volume of windfall planning applications submitted to and granted by the Council, see Table 12 below. Note that the sites are located within the established area, or have been permitted through policies pertaining to the reuse of buildings, and have not required any additional releases of greenfield land. Most of these sites are under construction whilst some are already complete.

Table 12 – Windfall Planning Applications for Housing Granted Since the Preparation of the Current Local Development Plan

Application Reference	Site Details	Units (All-Tenure)	Decision Date	Status
TP/ED/14/0906	172 Drymen Road, Bearsden	4	12.10.2016	Under Construction
TP/ED/15/0095	26 Ledcameroch Road, Bearsden	9	29.04.2016	Complete
TP/ED/16/0293	8 Switchback Road, Bearsden	23	17.03.2017	Under Construction
TP/ED/16/0436	Lochmill Farm, Antermony Road, Milton Of Campsie	8	23.03.17	Complete
TP/ED/16/0466	Mitchell Hire (64 High Street), Kirkintilloch	41	14.02.2017	Under Construction
TP/ED/17/0075	52, Main Street, Milngavie	5	26.03.2018	Complete
TP/ED/17/0199	Watshod Farm, Campsie Road, Milton Of Campsie	5	16.07.2018	Under Construction
TP/ED/17/0296	Fossil Grove/ David Gray Dr, Kirkintilloch	6	15.09.2017	Under Construction
TP/ED/17/0717	6 St Mungo Street, Bishopbriggs	64	22.02.2018	Under Construction
TP/ED/17/0831	St Agatha's Primary School, Waterside Road, Kirkintilloch	15	14.11.2018	Consented
TP/ED/17/0930	60 High Street, Kirkintilloch	16	13.08.2019	Under Construction
TP/ED/18/0033	87 To 97 Townhead, Kirkintilloch	11	13.09.2018	Consented

Application Reference	Site Details	Units (All-Tenure)	Decision Date	Status
TP/ED/18/0378	Lenzie Primary, Kirkintilloch Road, Lenzie	20	27.05.2019	Consented
TOTAL		227		

Note that this table is for demonstration purposes only to show the pace and scale at which new windfall development emerged after the current Local Development Plan was prepared and does not directly inform the windfall allowance for LDP2.

Therefore, for the reasons set out above the Council is satisfied that the 43 windfall units per year over the past 10 years will be borne out, at the very least if not exceeded, over the plan period of the Local Development Plan 2. As such the Council considers that the proposed windfall allowance is appropriate and in accordance with the requirements of Scottish Planning Policy.

Impacts of the Covid-19 Pandemic on the housing market

On March 23rd 2020 the Covid-19 Pandemic resulted in the shutdown of all construction works in Scotland thus affecting all housing sites in East Dunbartonshire currently under development. As part of the Scottish Government's plans to ease restrictions some limited outdoor construction work was permitted to recommence on May 29th 2020. However, most construction work was permitted to recommence on June 22nd 2020 subject to social distancing and a phased return.

Site visits by Council Officers to current development sites in East Dunbartonshire following the main relaxation have shown that many sites have resumed construction works, though a limited number are yet to return. Informal discussions with the development industry have indicated that the pace of works and volume of labour present at each varies greatly between different developers. All of the developers have however stated, even those where production has returned to normal as much as is possible, that build times will be longer for the foreseeable future.

Although construction works have resumed, it is clear that the pandemic will have longer lasting implications for the housing market beyond the direct impact of the lost 13 weeks when works were halted. Many industries have severely been affected by the lockdown and the UK economy is widely considered to be in recession. It is currently too soon to gauge the full extent of the crisis on the economy, timescales for recovery and the subsequent impact upon housing demand in the future.

Notwithstanding the Covid-19 crisis, Scottish Planning Policy (SPP) is clear that housing targets in development plans should properly reflect the Housing Need and Demand Assessment estimates and, until the Planning (Scotland) Act 2019 is fully implemented, that Local Development Plans should be consistent with the adopted Strategic Development Plan. Moreover, the Local Development Plan is scheduled to be adopted in 2022 and is required to set a long-term Housing Land Requirement until 2032 and a knee-jerk response to the crisis could adversely impact upon wider spatial priorities and outcomes.

Whilst it is considered that the Covid-19 crisis should not affect the housing targets and overall approach to housing land in Local Development Plan 2, it is clear that the pandemic will have a significant impact in terms of programming new completions in the Housing Land Audit and the short-term effectiveness of sites. However, the crisis does not affect the ability of the sites allocated

in the Proposed Plan to become effective during the life of the plan. Sites where action is required to overcome any physical constraints to enable development to commence are listed in the Delivery Programme.

Housing Land Audits 2019 & 2020

The Housing Land Audit is prepared annually and monitors the supply of housing land by tracking yearly completions and expected future programming. The Base Date of the audit is April 1st each year, after which site visits to monitor progress at each site are conducted as soon as practicable. Due to the Covid-19 crisis as discussed above, preparation of the 2020 audit has been delayed. Site visits to each site to determine the number of new housing units complete since the last audit have been carried out in late July and early August. Although this is approximately 4 months after the normal audit base date, it is still considered to be a suitable count of the number of units complete and occupied in the year 2019 – 2020 (due to the period when construction works were not permitted and the slower rate of works since they have resumed). However, a significant element of the audit process is setting the expected future programming on site, which is currently difficult to achieve until the housebuilding industry has fully resumed business and the possible impacts on short to medium term demand for new homes is understood.

The Proposed Plan therefore requires to be based on the existing 2019 Housing Land Audit which has been finalised and agreed with Homes for Scotland (the industry body for house-builders) <https://www.eastdunbarton.gov.uk/residents/planning/planning-policy/housing-land-audit>.

As the new site allocations in the Proposed Plan did not have any formal status on the audit base date of April 1st 2020, they would not have been included in the 2020 HLA regardless of the delays to the audit process. The potential timescales for developing the new housing sites allocated in the plan is addressed in the relevant section above.

4. Final Housing Land Supply for Local Development Plan 2

Section 2 above has discussed the Strategic Development Plan Housing Supply Target, the Local Housing Strategy 2017 revision to the target, the extrapolation of the Strategic Development Plan target (to extend the period by 3 years from 2029 to 2032) and the application of 15% generosity to produce the Housing Land Requirement for Local Development Plan 2. Section 3 has discussed the new allocations included within the Proposed Plan, the established supply, the effectiveness and range of sites and the contribution of windfall development in meeting the Housing Land Requirement.

Table 13 below combines the information addressed in Sections 2 & 3 to set out the finalised housing land supply provided in the Proposed Plan.

Table 13 – Final Housing Land Supply (Proposed Plan Policy 12 Table - Housing Land Supply)

Period 2012 – 2024: Based on LHS 2017 Target			
	Affordable	Private	All Tenure
Strategic Development Plan Housing Supply Target	630	1,610	2,240
Local Housing Strategy Revised Housing Supply Target	1,300	2,400	3,700
Period 2025 – 2032: Based on Clydeplan Strategic Development Plan 2017 (Extended from 2029 to 2032)			
	Affordable	Private	All Tenure
Strategic Development Plan Housing Supply Target	0	32	32
OVERALL PERIOD 2012 – 2032			
	Affordable	Private	All Tenure
2012 – 2024 Housing Supply Target	1,300	2,400	3,700
Plus 2025 – 2032 Housing Supply Target	0	32	32
Minus Completions	603	1,789	2,392
Equals	697	643	1,340
Plus 15% Generosity	105	96	201
EQUALS HOUSING LAND REQUIREMENT	802	739	1,541
Existing Supply			
Existing Supply (Housing Land Audit 2019)	870	1,610	2,480
Minus Deallocated Sites	8	66	74
Plus New LDP Allocations	214	255	469
Plus Windfall Allowance	138	418	556

Period 2012 – 2024: Based on LHS 2017 Target			
<u>EQUALS TOTAL HOUSING SUPPLY</u>	1,214	2,217	3,431
Surplus/ Shortfall to Target	+412	+1,478	+1,890

The above table demonstrates that the Council has met the requirements of Scottish Planning Policy by providing a Housing Land Requirement that is consistent with HNDA2 and Clydeplan Strategic Development Plan 2017 Policy 8 and that a sufficient supply of land is allocated by Local Development Plan 2.

5. Housing Mix

Design of Housing

Range of Housing Types, Sizes and Tenures

A key component of the Scottish Government's vision in 'Housing to 2040' is that new build housing in the future will provide a greater variety of types and sizes to better meet the needs of its occupants. In particular the person centric vision and principles in 'Housing to 2040' seek the following:

- "That I can quickly find a home that is right for me and I have a choice about the type of home I live in.
- As an older person wanting to move, I can get help to move to a home which better meets my needs.
- My home is well-designed and of a high standard, with enough space and flexibility to allow me to live well.
- I understand exactly how much it costs to run my home and what I can do to reduce costs and carbon emissions; it's great that fuel poverty is a thing of the past.
- There is a good mix of housing where I live, which means I have the option to stay in the area if my needs change.
- There is a larger number and a greater variety of house builders and developers, including Small and Medium-sized Enterprises, community and social enterprises, custom-build and self-build".

Responses to the Main Issues Report (MIR) from the local community (consistent with previous consultations such as the early engagement for LDP2) were overwhelmingly supportive of the preferred option to introduce stronger requirements in planning policy for the type, size and quality of new homes that are built in East Dunbartonshire. Many residents commented that new housing tends to be large 'executive' style homes and that a mix of different sizes would help to meet the housing needs of local people.

Whilst the development industry seemed to largely agree with the overall aim that the preferred option in the MIR was seeking to achieve, most supported the alternative option of retaining the existing wording and leaving the site mix and other matters to be dealt with on a case by case basis. Some site promoters stated that restrictive standards would risk the viability of new development, distort market demand and reduce the pace of delivery. Some site promoters also stated that the setting of technical standards is best delivered through Building Standards regulations.

Wheelchair and Accessible Housing Target

The Scottish Government's More Homes Division has instructed Local Authorities through the publication of Local Housing Strategy Guidance in March 2019 and a follow-up communication in December 2019 to set out targets to support the delivery of more Wheelchair Accessible housing. The letter from the Scottish Government to the Association of Local Authority Chief Housing Officers on 19 Dec 2019 states the following:

'In March 2019, guidance was issued for local authorities on the setting of LHS targets to support the delivery of more wheelchair accessible housing. The guidance highlighted that refreshed LHS guidance due for publication in summer 2019, would contain information on the requirement for a wheelchair accessible housing target, based on the guidance. It also stated that all tenure housing targets are expected to be in place by the end of 2019 with local authorities required to provide a further update as part of Strategic Housing Investment Plan (SHIP) submissions setting out their plans and timescales for the implementation of approaches.'

'All local authorities are expected to have all tenure targets. We appreciate concerns raised by some local authorities about the ability to set and enforce targets for the private sector. While we appreciate that enforcement of private sector targets will require collaboration with local authority planning colleagues and developers, we would expect councils to clearly set out their ambition and have in place a clear statement of intent in the form of a private sector target.'

The current East Dunbartonshire Local Housing Strategy is due to be reviewed in 2022 and it is considered that this would normally be the appropriate route to consider the new requirements, with the housing policies in the development plan being updated thereafter at the next available opportunity. Additionally, whilst the instruction has been to interpret the requirements into local targets the Council considers that changes to Building Standards regulations at a national level would be the most successful way to achieve the sought increase in the delivery of wheelchair accessible housing.

Although the Local Housing Strategy is not yet due to be reviewed, targets for wheelchair accessibility in affordable housing can be addressed through the Strategic Housing Investment Plan which is updated regularly. The Council is working to ensure that the targets are met in this regard. However, the Scottish Government requirements are clear that the new wheelchair accessible housing targets apply to all tenures include new private homes. Therefore, the Council considers that there is no alternative to achieving the targets for the private sector except through the Proposed Plan and a requirement for 10% of new private sector housing to be provided as wheelchair accessible housing is included within Policy 12.

Housing Suitable for Older People

Background to Older Peoples and Specialist Housing Study

The proportion of people in East Dunbartonshire of pensionable age and over is predicted to grow by 21.7% by 2036, and the proportion aged 75 and over by 63.7% (NRS projections 2016). The provision, quality and experience of housing for older people and those with specialist needs impacts upon the work of various teams within East Dunbartonshire Council and East Dunbartonshire Health and Social Care Partnership.

Local outcome 6 of the East Dunbartonshire Local Outcome Improvement Plan (LOIP) 2017 – 2027 is that 'Our older population and more vulnerable citizens are supported to maintain their independence and enjoy a high quality of life, and they, their families and carers benefit from effective care and support services.' The LOIP identifies a number of issues for older people that relate to the supply and provision of appropriate housing and require to be addressed in order to achieve local outcome 6.

The ageing population has already resulted in increased demand for health and social services which, set against a backdrop of many years of reductions in public budgets and challenges in retaining the workforce, has led to significant pressures on delivery. The continuing increase in the number of older people, coupled together with uncertainty following the UK's exit from the European Union (and now the Covid-19 pandemic) may exacerbate these pressures on services and the ability to deliver them.

The quality and suitability of housing plays a major role, not only in how services for older people are delivered, but also in the prevention of health conditions and improving quality of life. Therefore improving the housing supply to better fit the needs of older people will play a significant part in enabling services to keep pace with demand. The impact of health upon housing and vice versa however is not exclusive to older people and thus the quality and suitability of housing has a significant impact upon the health and care of persons with non-age related conditions, both physically and mentally.

To ensure that housing in East Dunbartonshire meets people's needs, now and in the future, and contributes positively to the ageing population a coordinated response by the Council's Housing and Land Use Planning teams and the HSCP is required. A holistic approach will ensure best use of resources and that change is implemented consistently across the services through their respective areas of work. This led to the joint commissioning of a study into older peoples housing to understand the particular issues faced in East Dunbartonshire and how these could be addressed. The study is based on several aims which were set and agreed by the services involved and is intended to examine current and potential future issues. Arneil Johnston were appointed in February 2019 to conduct the study. The study was completed in spring 2020, however the onset of the Covid-19 pandemic resulted in a slight delay to bringing the Study to Council and the HSCP Board for approval given the HSCP and Council has been fully focused on dealing with Covid-19.

Study Findings and Recommendations

One of the key findings in the research was that the vast majority of people over the age of 65 wish to remain in their current property and do not wish to move home either now or in the future. Delving deeper into this however, the research found that of the people who were looking to move it was often the result of a health crisis and moving sooner would have potentially avoided this from occurring. The research also found that whilst a minority of people aged over 65 wished to move property now or in the future, demand currently outstrips supply and that with the proportion of older people expected to increase this may exacerbate the shortfall.

The study makes a vast set of recommendations for the Council and Health and Social Care Partnership to consider in their work going forward. Some of the recommendations most relevant to land use planning are follows:

- East Dunbartonshire Council and HSCP should challenge this notion of ageing in place as a uniquely positive force in an older person's life and focus instead on ageing in the right place. It is often a health crisis that forces people to consider their circumstances and look at their housing needs more closely.
- East Dunbartonshire Council and HSCP may wish to reflect on the impact of specialist or age exclusive housing on improving the wellbeing and outcomes of older people who are frail.
- Consideration needs to be given to how a personal outcomes approach can be embedded in future product design and service delivery thereby maximising choice. Activity on how 'Third

Agers' can be encouraged to engage in personal housing planning on a proactive basis should be a priority for partners.

- Age exclusive housing which is 'care ready' should be encouraged in local planning policy but is incumbent on the development of a partnership, funding and commissioning framework across EDC, RSLs and the EDHSCP. Building such partnerships will help to address the organisational, cultural, funding and communication barriers that persist across housing, health and social care partners. A partnership approach will also assist health services and professionals to appreciate the role that housing partners can play in meeting the needs of older people and enabling preventative activity.
- The Local Development Plan should consider inclusion of a clearly defined policy on older people's housing potentially linked to Section 75 agreements. Specific design briefs and transparency around target assumptions should be included to aid delivery and encourage a level playing field for developers. Developers see the Private Retirement Sector as a "huge growing market" in East Dunbartonshire where older owners are sitting on significant equity value in their homes.
- Age Friendly neighbourhood principles should be built into planning policies, integrating age friendly housing as part of healthy, inclusive mixed tenure housing developments.

It is perhaps important to note at this point that whilst responses to the early engagement and the Main Issues Report were very supportive of LDP2 addressing the ageing population proactively, a sizeable number were clear to point out that it was not only older people that may have specialist housing needs and particularly that many younger people in East Dunbartonshire struggle to meet their housing needs. Smaller housing that may appeal to older people was also judged to be likely to appeal to younger people/ first time buyers and that such housing should be open to all and not age restricted.

Response in Local Development Plan 2

The planning system is a key vehicle in addressing the land use element of improving the supply of good quality homes suitable for older people and acting upon the recommendations in the research. The existing Local Development Plan currently supports health and ageing outcomes through policies on inclusive design and neighbourhoods, provision of quality affordable homes, support for older peoples housing, active and public transport and access to good quality open space. However, it is clear that planning can do more to support this agenda.

Homes for Scotland were interviewed as part of the project and identified older peoples housing a potential area of growth for volume housebuilders given the departure of McCarthy & Stone in Scotland. They added that any targets would be required to be clearly evidenced and site briefs must be clear to create a level playing field for potential developers. However, in their representation to the Main Issues Report, which contained an option for setting a specific target for older peoples housing, they did not support an approach that would be seen by developers as overly prescriptive and that the market should be given the opportunity to respond freely to demand.

Any response to the ageing population in LDP2 needs to sit within the parameters set by Scottish Planning Policy and be defensible at the LDP examination. Whilst current Scottish Planning Policy encourages the development of specialist housing, formal guidance on how development plans should address the issue is thus far limited. Addressing the ageing population has been identified as a key priority in the Scottish Government's reforms to planning system, however requirements for

LDP's are still in development. The research was intended to take a long-term analysis of older peoples and specialist housing and will help to influence decisions not only in LDP2 but future planning strategies in the new planning system when this has fully taken shape.

Therefore, it is considered that a pragmatic approach to older peoples and specialist housing is required in LDP2 and that the policies in the current LDP will be improved through the following changes:

- Further focus on delivering a more diverse range of housing sizes and types;
- The need to provide 10% of units of all tenures as wheelchair accessible housing;
- Introducing a requirement for sites within 400m walking distance of town and village centres (including also Lenzie local centre), and exceeding 5 units in total, that a minimum of 50% of the units on site will be provided as smaller housing of no more than 2 bedrooms that are accessible without stairs (for example flats with lift access);
- Wording enhancements to the current older peoples and specialist housing section setting out greater detail particularly in relation to the location of sites, and
- Creating a robust framework for developer contributions relating to the impact of new housebuilding and care homes on primary healthcare.

Appendix 1 – Sites not included within the Proposed Local Development Plan 2

Section 3 Meeting and Augmenting the Housing Land Requirement sets out new allocations in LDP2.

The remaining sites that have not been included as new LDP2 sites, and are therefore not included in the Proposed Plan, are considered to be unreasonable in terms of the Council's strategy set out in this Report. These sites are split into two further packages: Alternative Sites with moderate constraints; and sites which are considered unsuitable for new housing development.

Alternative Sites

The Main Issues Report set out an alternative housing package and associated criteria for sites that were considered to have moderate development constraints. These sites were identified as having potential to contribute in some way to the preferred spatial strategy, provided that the constraints could be avoided or mitigated. However, these sites did not meet all of the criteria set out in the Main Issues Report preferred option. In preparing the Proposed Plan the Main Issues Report alternative package criteria has been reapplied and updated as appropriate.

The moderate constraints for the alternative sites in the Proposed Plan includes:

- 2A. Development is on a greenfield site, which does not ensure that brownfield land within settlements is fully utilised and does not fully support a compact city region.
- 2B. Protection of the green belt, in areas with low defensibility and/or functions.
- 2C. High or medium landscape capacity
- 2D. Does not provide access to frequent (every 15 minutes, throughout the day) Public Transport (bus stop, rail station) within 400m walk via safe, well-lit and all weather routes
- 2E. Does not provide access to Active Travel routes (core path, cycle network, walking, cycling) within 400m walk via safe, well-lit, safe and all weather routes
- 2F. Remote from town/ village centre and/or commercial centre by walking, cycling and public transport, therefore will increase the need to travel by private transport to services
- 2G. Site would result in impact on the road network
- 2H. Result in fragmentation of the green network habitat or access links.
- 2I. Site contains habitat which is a Local Biodiversity Action Plan priority habitat.
- 2J. Potential adverse impact on: a Conservation Area, Category B - Listed Buildings or its setting, Locally Important Garden and Designed Landscape
- 2K. May negatively impact business activity or employment either on or proximate to the site, but does not necessitate loss of permanent or Full Time Equivalent employment or directly cause failure of well-established and active business enterprise.
- 2L. Adverse impact on amenity of proposal from existing or proposed neighbouring use
- 2M Potential contamination
- 2N Potential localised flood risk

Appendix Table 1 below sets out the sites that have been assessed as meeting the criteria for the alternative sites package in the Proposed Plan.

Appendix Table 1 – Alternative Sites

Reference	Site	Settlement	Proposed Use	Affordable ¹	Private ¹	Total ¹
S330	Duncryne Place	Bishopbriggs	Housing	20	-	20
S365	Langmuir Road	Kirkintilloch	Housing	18	-	18
S322	Derrywood Road	Milton of Campsie	Housing	40	-	40
S375	Kincaidfield	Milton of Campsie	Housing	5	15	20
S227	Halley's Garage	Milngavie	Housing (possibly age exclusive/ older people)	12	38	50
Total				95	53	148

¹ The capacities set above are indicative only for the purposes of calculating housing land supply and do not prejudice the assessment and final outcome.

The Main Issues Report identified two sites that met the alternative package criteria: S322 Derrywood and S227 Halley's Garage. These sites have been carried forward to the alternative sites package for the Proposed Plan as they do not fit with the strategy as set out in section 3 of this report and Policy 1 of the Proposed Plan.

One of the additional sites that was submitted at the Main Issues Report stage, S375 Kincaidfield, has been assessed as having moderate constraints and has therefore also been included within this package. All of the other additional sites that were submitted during the Main Issues Report consultation are included within the unsuitable package below. Note that all of the additional sites will be subject to public consultation concurrently with the Proposed Plan. This is to ensure that all sites have been subject to consultation and that comments on these sites can be made available to the Reporter.

Further assessment work has also resulted in two of the sites contained within the Main Issues Report preferred option; S330 Duncryne Place and S365 Langmuir Road, being reassessed as having moderate constraints and being not suitable for inclusion within the Proposed Plan and therefore they have been added to the alternative sites package.

It must be noted that the Council is not recommending the inclusion of these sites in LDP2. It should also be noted that the alternative package is limited and that not all community areas have alternative sites. This reflects the degree of constraints relating to the majority of the sites that were suggested for development in each settlement and indeed the wider environmental constraints across East Dunbartonshire.

Unsuitable Sites

The unsuitable sites have been assessed as being unsuitable for development and therefore would be unreasonable to include in LDP2. The majority of these sites were submitted at the Call for Sites stage and were published as part of the Site Assessment document alongside the Main Issues Report. However, 9 additional sites were received during the Main Issues Report consultation, 8 of

which have subsequently been assessed as unsuitable (one has been included within the alternative sites as addressed above).

In addition to assessing all of the sites that were submitted at the Call for Sites and Main Issues Report stages, a checking exercise was undertaken to ensure that sites granted planning consent since the adoption of the current Local development Plan were assessed for fit with the Proposed Plan strategy and the allocation criteria. Consequently sites contained within the 2019 Housing Land Audit that were both not yet under construction and where tangible evidence of the site being progressed was not observed, were also assessed using the site package criteria. Three of the six sites that were assessed as part of this process, namely S381 Saddler's Brae Farmhouse, S379 Wester Gadloch Farm and S378 Craigton Works, were deemed to be unsuitable to carry forward into LDP2. The remaining three sites have been added to LDP2 along with the other appropriate new consents (note that these sites are not considered to be new allocations as a direct result of the Proposed Plan strategy, and were previously included within the established land supply).

The additional sites and HLA sites will be subject to public consultation concurrently with the Proposed Plan, in order to ensure that all sites have been subject to consultation and that comments on these sites can be made available to the Reporter. It must be noted that the Council is not recommending the inclusion of these sites in LDP2.

The sites are unsuitable for development for at least one of the following reasons:

- 3A. Existing or potential neighbouring uses are incompatible in amenity terms
- 3B. Protection of the green belt, site is in areas with high or medium- high defensibility and/or green belt functions or site would result in isolated development in the green belt
- 3C. Protection of the green belt, site is in areas with medium defensibility and/or functions.
- 3D. Low landscape capacity for development
- 3E. Development on a safeguarded transport locations
- 3F. Loss of open space
- 3G. Adverse impact on a community facility or outdoor sports facility
- 3H. On or adverse impact on SSSI, Local Nature Reserve or Local Nature Conservation Sites
- 3I. Biodiversity value of habitat which is on Scottish Biodiversity List.
- 3J. On Deep Peat and Carbon Rich Soils
- 3K. Prime quality agricultural land
- 3L. Site located in a 1 in 200 year Flood Risk Area, river or surface water
- 3M. Adverse impact on: Frontiers of the Roman Empire (Antonine Wall) World Heritage Site (FRE(AW)WHS) and its buffer zone or a nationally designated historic environment site and/or its setting: Scheduled Monument, Category A listed building and/or nationally important Garden and Designed Landscape at Milngavie Reservoirs
- 3N. Development necessitates loss of permanent or Full Time Equivalent employment and/or failure of well-established and active business enterprise either on or proximate to the site.
- 3O. Is in buffer zone of a hazardous installation.
- 3P. Development of mainstream housing within Killermont Primary School catchment (i.e not retirement/ age exclusive housing).

Appendix Table 2 sets out all of the sites that have been assessed as part of the Proposed Plan process as being unsuitable for new housing development.

Appendix Table 2 – Unsuitable Sites

Reference	Site	Settlement	Proposed Use	Affordable ¹	Private ¹	Total ¹
LDP 23	Baltimore Paddock	Baltimore	Housing	TBC	TBC	number unspecified, 25% affordable units
S374	Bogside Road	Baltimore	Housing	0	5	5
S221	East Baltimore	Baltimore	Housing	3	9	12
S207	Boclair Farm	Bearsden	Housing and open space	53	157	210
S228	Douglas Park Golf Club	Bearsden	Housing	n/a	n/a	n/a
S220	Edgehill Road	Bearsden	Housing, office, industry	TBC	TBC	TBC
S310	Millichin Rd	Bearsden	Housing	168	504	672 Note: majority of site within Glasgow City Council
S301	E of Stockiemuir Rd	Bearsden	Housing	12	38	50
S305	Kessington Phase 2	Bearsden	Housing	30	90	120
S2 & S225	Langfaulds	Bearsden	Housing	54	160	214
S5	Wester Lumloch/ Westerhill Farm	Bishopbriggs	Housing and open space	TBC	TBC	TBC
S340	Bishopbriggs North - Site B	Bishopbriggs	Housing	38	112	150
S341	Bishopbriggs North - Site C	Bishopbriggs	Housing & cemetery extension or cemetery	50	150	200

Reference	Site	Settlement	Proposed Use	Affordable ¹	Private ¹	Total ¹
S343	Crofthead Phase 2	Bishopbriggs	Housing and open space	38	112	150
S123	Thomas Muir Ave/ Calliburn Rd	Bishopbriggs	housing and open space	23	76	99
S332	Huntershill Rd/Crowhill Rd	Bishopbriggs	Housing	28	-	28
S331	Lennox Crescent	Bishopbriggs	Housing	20	-	20
S224	Glenburn Gardens	Bishopbriggs	Housing	4	-	4
S208	Bankhead Road/ Monastery Field	Kirkintilloch/ Waterside	Housing	TBC	TBC	TBC
S368	Braes of Yetts Farm	Kirkintilloch	Housing	7	22	29
S370	Fauldhead South	Kirkintilloch	Housing	8	22	30
S351	Friars Croft	Kirkintilloch	Housing	14	-	14
S200	Gartconner	Kirkintilloch	Housing	37	113	150
S57	Gartshore Estate	Kirkintilloch	Housing, business, hotel, community facilities, open space	300	900	1200
S325	Langmuir Park	Kirkintilloch	Housing	16	-	16
S7	Langmuir South	Kirkintilloch	Housing	20	60	80
S364	Parkview Avenue	Kirkintilloch	Housing	3	9	12
S369	Pitt Road	Kirkintilloch/ Waterside	Housing	42	128	170
S339	Saddler's Brae	Kirkintilloch	Housing	50	150	200
S381	Saddler's Brae Farmhouse	Kirkintilloch	Housing	0	4	4
S345	Waterside Rd/Gartshore Rd	Kirkintilloch	Housing	TBC	TBC	80 (mix tbc)
S348	Wester Gartshore	Kirkintilloch	Housing	100	300	400
S376	Morrison Drive	Lennoxton	Housing	12	37	49
S314	Rowantree Place	Lennoxton	Housing	25	75	100

Reference	Site	Settlement	Proposed Use	Affordable ¹	Private ¹	Total ¹
S373	Auchinloch Road	Lenzie	Housing	30	90	120
S181	Blacklands Place Southeast	Lenzie	Housing and open space	35	35	70
S46	Boghead Road	Lenzie	Housing	25	75	100
S201	Crosshill Road	Lenzie	Housing	25	75	100
S379	Wester Gadloch Farm	Lenzie	Housing	0	5	5
S350	Allander Way, Former Sewage Works	Milngavie	Housing	11	34	45
S336	Ashburn Rd/ Craigielea Crescent	Milngavie	Housing	Affordable flats – 8 Affordable houses - 10	0	18 affordable
S378	Craigton Works	Milngavie	Housing	0	10	10
S302	Chestnut Lane	Milngavie	Housing	Affordable Flats – 20	Private Houses (3 bed or less) – 100 Private houses (4 bed or more) – 20 Age Exclusive/Retir ement – 20 Build to Rent – 40	200
S223	Dougalston Ave	Milngavie	Housing	0	5-8	5-8 units (retirement)
S15A	Dougalston Estate	Milngavie	Housing	Affordable Flats - 13	Private flats – 2	52

Reference	Site	Settlement	Proposed Use	Affordable ¹	Private ¹	Total ¹
					Private Houses (4 bed or more) – 26 Split level homes (3/4 bed) – 11	
S377	Dougalston Golf Course	Milngavie	Housing	41	122	163
S186	Glassford House	Milngavie	Housing	5-10	15-30	20-40 units
S16	Hunter Road	Milngavie	Housing	36	0	36 affordable flats (for older people)
S317	Mugdock Road/ Drumclog Ave	Milngavie	Housing	0	1	1 (self-build)
S25	North of Old Mains Farm	Milngavie	Housing	33	100	133
S313	Roselea Drive	Milngavie	Housing	TBC	TBC	Units not specified
S300	South Prestonfield	Milngavie	Housing	20	60	80
S49	Tambowie Farm	Milngavie	Housing	40	120	160
S18	Redmoss Farm	Milton of Campsie	Housing	300	0	300
S205	West Birdston	Milton of Campsie	Housing	13	40	53
S27	Badenheath	Twechar - Outwith settlement	Housing	Affordable Houses – 150 Age Exclusive / Retirement Living / Special needs for blind – 25	Private 3 bed or less – 15 Private 4 bed or more – 10	200
S222	Campsie Rd South	Torrance	Housing	13	37	50

¹ The capacities set above are indicative only for the purposes of calculating housing land supply and do not prejudice the assessment and final outcome.