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proposed local development plan  
**technical note 1** 2016

PLANNING FOR HOUSING, HOUSING REQUIREMENTS,  
HOUSING LAND REQUIREMENTS & HOUSING LAND SUPPLY

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## LIST OF ABBREVIATIONS

<b>ABBREVIATION</b>	<b>FULL TITLE</b>
NPF	National Planning Framework
SPP	Scottish Planning Policy
PAN	Planning Advice Note
HNDA1	SESplan's First Housing Need and Demand Assessment
HR	Housing Requirement
HST	Housing Supply Target
HLR	Housing Land Requirement
HLA	Housing Land Audit
SESplan	Strategic Planning Authority for Edinburgh & South East Scotland
SDP1	SESplan's First Strategic Development Plan
SGHL	Supplementary Guidance on Housing Land
SPG	Supplementary Planning Guidance
LDP1	East Lothian Council's first Local Development Plan
PLDP1	East Lothian Council's first Proposed Local Development Plan
MIR	Main Issues Report
TN	Technical Note
LHS	Local Housing Strategy

## INTRODUCTION

1.1 East Lothian Council's Proposed Local Development Plan (PLDP1) is accompanied by a series of Technical Notes (TNs) that describe the approach the Council has adopted to planning issues in the preparation of the PLDP1 for East Lothian.

1.2 This TN explains the approach the Council has taken to meeting the Strategic Development Plan Housing Requirements and Housing Land Requirements for East Lothian. It also explains how, at the point of adoption, the PLDP1 will provide enough effective housing land for at least five years. This TN describes the following:

- Relevant provisions of the Scottish Government's National Planning Framework 3 (2014), Scottish Planning Policy (2010 and 2014) and Planning Advice Note (2/2010);
- Relevant findings of the Examination in Public of the Strategic Development Plan for Edinburgh and South East Scotland, including the Reporter's interpretation and reasoning, conclusions and recommendations;
- Relevant requirements of the approved Strategic Development Plan for Edinburgh and South East Scotland and its associated Supplementary Guidance on Housing Land;
- Relevant considerations from consultation responses to the Council's Main Issues Report;
- The policy approach of the PLDP1 to planning for housing, including the amount of housing land made available and the associated policy framework;
- The numerical basis and technical justification for the approach taken.

1.3 This TN is broadly split into sections that reflect the points above. It describes how East Lothian Council has interpreted and applied relevant national and regional planning policies as well as associated advice and guidance on Housing Requirements, Housing Land Requirements and ensuring enough effective housing land will be provided in the preparation of PLDP1.

1.4 The main body of the TN deals with the policy issues and explains the approach taken. The technical background for PLDP1 is at Appendix 1. The full programme of housing development anticipated for the PLDP1 is at Appendix 2.

1.5 A separate TN deals with the provision for affordable housing through the planning process.

### National Planning Framework 3

2.1 The Scottish Government's National Planning Framework 3 (NPF3) is to be a material consideration in plan-making. The expectations of NPF3 have been reflected in the spatial strategy, development and policy requirements of the first Strategic Development Plan (SDP1) for Edinburgh and South East Scotland, prepared by the Strategic Planning Authority for Edinburgh and South East Scotland (SESplan) as approved by Scottish Ministers. SDP1 must be conformed to in the preparation of the Local Development Plan (LDP1) for East Lothian. The following paragraphs provide a high level summary of NPF3s key expectations in relation to planning for housing.

2.2 NPF3 acknowledges that the SESplan area is projected to have one of the fastest rates of growth in Scotland. Development plans are to ensure associated development needs are met, whilst taking into account existing and future infrastructure capacity. In particular, NPF3 expects a greater and more concerted effort to deliver a generous supply of housing land in the SESplan area, including East Lothian. Development plans are to accommodate additional housing development in a way that is appropriate to their local area, including where provision of new housing could help support regeneration. A generous supply of housing land in sustainable places is to be provided where people want to live. Development plans should focus on areas where there is pressure for development and where the greatest levels of change are expected.

2.3 Where infrastructure capacity is limiting the delivery of new housing and other development, NPF3 expects to see more concerted efforts – involving local authorities, developers, government agencies and infrastructure providers working collaboratively – to remove these constraints. Solutions could include new infrastructure provision in some cases, but more viable and sustainable options are likely to make best use of existing infrastructure and service capacity. Strategic thinking, partnership working and innovation will be needed to unlock funding for additional capacity enhancement. The need and demand for new housing will continue to be most acute around Edinburgh, requiring targeted action to better match development land with infrastructure capacity.

2.4 More people are expected to live and work in rural areas as digital links and opportunities for remote working and new enterprises continue to grow. NPF3 does not want development to be unnecessarily constrained in more rural towns and areas. Development plans should reflect the varying characteristics and pressures on rural communities. More remote areas are likely to benefit from a more flexible approach, particularly where this could help to sustain fragile communities. Facilitating the delivery of affordable rural housing is to remain a priority. However, careful planning will also be required to manage demand in the most accessible countryside around towns and cities.

## Key points to note

**NPF3 expects development needs to be met in sustainable locations. To ensure enough homes can be provided for the growing population, sufficient and appropriate generous land supply for housing is to be made available where people want to live and to support economic growth and regeneration. Infrastructure and service capacity are acknowledged as constraints that need to be overcome to ensure development can be delivered in the right places, and innovative partnership approaches to funding and delivery solutions will be required.**

## Recent Changes in Scottish Planning Policy

2.5 The Development Plan for East Lothian will consist of two parts. The first part will be SDP1. The other part will be, once adopted, the Local Development Plan for East Lothian (LDP1). The emerging LDP1 for East Lothian must, by law, conform to SDP1. It was prepared and approved in the context of Scottish Planning Policy (2010). Since approval of SDP1, the Scottish Government has replaced Scottish Planning Policy (2010) with new Scottish Planning Policy (2014). This means SDP1 and the emerging LDP1 for East Lothian are being prepared under different statements of Scottish Planning Policy (SPP).

2.6 In view of the changes to SPP, a key question in the preparation of LDP1 is if the new SPP (2014) carries sufficient weight to change the Housing Land Requirements (HLRs) of the approved SDP1 – i.e. the relative status of SPP (2014) as a material consideration in plan-making in the context of the legal requirement that LDP1 must conform to the approved SDP1, which reflects the policy direction of SPP (2010). Importantly, SPP (2014) is clear that plans, such as SDP1, are not to be considered out-of-date if adopted prior to the publication of SPP (2014). SPP (2014) is also clear that it should be a material consideration in plan-making and when determining planning applications<sup>1</sup>, but it should also be read and applied as a whole<sup>2</sup> when preparing plans and making planning decisions.

2.7 As such, an early focus of this TN is a review of the recent changes in SPP as they relate to the method, policy principles, terminology, requirements and time periods for how the Scottish Government expects development plans to plan for housing. By way of introduction, Table 1 below identifies the relevant key differences in the national policy approach between SPP (2010) and SPP (2014) - the key steps of the planning for housing process under SPP (2010) and SPP (2014) are identified as relevant to each SPP. These key differences are discussed in further detail in the sub-sections that follow. At the end of this section key messages are identified along with a synthesis of the relevant national policy issues as they relate to East Lothian's PLDP1.

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<sup>1</sup> SPP (2014) footnote 22 page 11.

<sup>2</sup> SPP (2014) paragraph v page 3.

TABLE 1: SUMMARY OF KEY DIFFERENCES BETWEEN SPP (2010) & SPP (2014)					
PLAN	STAGES / PROCESS / METHODOLOGY	SPP (2010)	COMMENT ON SPP (2010)	SPP (2014)	COMMENT ON SPP (2014)
SDP					
	HNDA	✓	SPP (2010) expected the Housing Need and Demand Assessment (HNDA) to provide 'the' evidence base for Housing Supply Targets (HST) Local Housing Strategies (LHS), and for Housing Requirements (HRs) and Housing Land Requirements (HLRs).	✓	SPP (2014) significantly changes the national policy approach for the next generation of Development Plans. It expects the HNDA estimates of need and demand to provide only 'part' of the evidence base for development plans.
	HST	X		✓	SPP (2014) is clear that the HST is to be a 'policy view' on the number of homes 'the authority has agreed' will be delivered over the periods of the SDP (SDP year 12 and 20 / LDP year 10). <b>The HST can be higher or lower than the HNDA estimates of need and demand.</b> An SDP is to identify a HST for each LDP area for the periods up to the end of SDP years 12 and 20 – the HST is to be split into market and affordable sectors.
	Number of new homes to be built during the plan period	X		✓	SPP (2014) expects SDPs to indicate 'the number of new homes to be built over the plan period' – i.e. that part of the HST to be set for the period up to SDP year 12 / LDP year 10. This is <i>similar</i> to the SPP (2010) 'Housing Requirement', <b>but SPP (2014) does not expect SDPs to set 'Housing Requirements'.</b>
	HR up to SDP year 12	✓	SPP (2010) expected the HR to equal to the HNDA estimates of 'need and demand'. HNDA estimates of need and demand were expected to be fully met when setting HRs.	X	
	HLR (not including 10 – 20 % generosity above the HR) up to SDP year 12	✓	SPP (2010) expected the HLR to be the amount of land to be allocated to meet the identified HR. SDPs were expected to set HLRs for each LDP area up to the end of SDP year 12/LDP year 10, taking in to account any redistribution of need and demand from one part of an SDP area to any other(s). SDPs were to ensure that the sum of HLRs for all LDP areas equalled the SDP HR / HNDA overall estimates of need and demand.	X	
	How much land is capable of development by the end of SDP year 7	✓	SDPs were expected to identify how much of the HLR <b>should</b> be met by site allocations that are 'capable' of development by the end of year 7 – i.e. it was not intended that any 'interim' HR or HLR be set by the SDP for the end of year 7 since SPP (2010) was clear that the HLR was <b>only</b> to be set for the period up to the end of SDP year 12 / LDP year 10.	X	
	HLR (including 10 – 20 % generosity above the HST)	X		✓	SPP (2014) expects that the HST set for the period up to SDP year 12 / LDP year 10 to be increased by a margin of 10 – 20%, justified as appropriate, to set the HLR for SDP and LDP areas.

LDP					
	<b>Generosity</b>	✓	<p>SPP (2010) expected development plans to provide a ‘generous’ housing land supply. However, the act of maintaining a continuous five-year effective housing land supply would ensure that a ‘generous’ supply of land for house building’ would be maintained (para 75) – i.e. SPP (2010) did not pre-determine the amount of generosity to be provided by a specified requirement to provide a particular amount or percentage of additional land above the Housing Requirement. Instead, SPP (2010) expected the amount of ‘generosity’ in the LDP housing land supply to be informed by the overall capacity and number of sites that were to be provided to allow enough homes to be built within the plan period to meet the HLR, considering the start dates and rates of programming anticipated for the development of those sites, and that not all of their capacity may be developed within the plan period. As such, SPP (2010) may have expected the capacity of the land supply to be greater than the HR and HLR set for the LDP by the SDP. However, SPP (2010) did not specify a generosity margin to be provided or not exceeded.</p>	X	<p>SPP (2014) expects generosity to be set by the SDP, and built in to the HLR the SDP sets for the LDP so the capacity of the LDP housing land supply is greater than the agreed HST for the LDP area. Generosity is added by an SDP to an LDP HLR in anticipation of some sites becoming non-effective during the plan period and to help ensure that, notwithstanding this, sufficient effective land will be available to deliver the agreed LDP HST and thus minimise the potential need to consider approving housing development on land not identified by the plan as suitable in principle for that purpose.</p>
	<b>Provide Enough Effective land for five years</b>	✓	<p>SPP (2010) provided no nationally prescribed method for how any calculation to measure the adequacy of the five year effective housing land supply should be carried out. However, in the context of SPP (2010), Scottish Government Planning Advice Note PAN 2/2010: Affordable Housing and Housing Land Audits advises that the adequacy of the five year effective land supply should be measured against the HLR, albeit it provides no specific advice on how such a calculation should be carried out.</p>	✓	<p>There continues to be no nationally prescribed method for how to calculate the adequacy of the five year effective housing land supply. PAN 2/2010 advises that this should be done against the HLR, but it was drafted in the context of SPP (2010). However, SPP (2014) now expects the HST to be an agreed policy view of the authority preparing the plan on the number of homes to be built during the plan period. SPP (2014) expects the HLR to have ‘generosity’ built-in above the HST to ensure plans provide more than enough effective land to meet the agreed HST. This is to allow some sites to become non-effective during the plan period and to indicate up-front how the plan will provide ‘enough’ effective land. However, measuring the adequacy of the five year effective supply against the HLR (with generosity built-in) would make maintaining an adequate effective supply more challenging than necessary to meet the HST. This undermines the principles of SPP (2014). There is an issue in the read-across between SPP (2014) and out-of-date PAN 2/2010 on how SPP should be interpreted and applied. PAN 2/2010 is under review and the consultation on the replacement PAN has now closed.</p>

## Scottish Planning Policy (2010)

### *Housing Supply Targets, Housing Requirements & Housing Land Requirements*

2.8 SPP (2010) expected the preparation of a Housing Need and Demand Assessment (HNDA) to provide estimates of housing need and demand that are likely to be experienced in a development plan area during the plan period. Once signed off as robust and credible by the Scottish Government's Centre for Housing Market Analysis, the HNDA overall estimates of need and demand were to be used to set overall Housing Requirements (HRs) and Housing Land Requirements (HLRs) for an SDP area as a whole.

2.9 Importantly, SPP (2010) stated that a HNDA was to provide 'the' evidence base for defining Housing Supply Targets (HST) for Local Housing Strategies (LHS), and for setting HRs and HLRs and allocating land for housing in the Development Plan (para 67). The scale, nature and distribution of the HR for an area was to be based on the outcome of the HNDA, and set out in the LHS as well as the Development Plan.

2.10 The meaning of the term 'Housing Requirement' is set out in the Glossary of PAN 2/2010 as the '*total amount and type of housing necessary to accommodate a given or projected population including both housing need and demand*' – i.e. HNDA estimates of need and demand were expected to be fully met. The expectation of SPP (2010) was that the overall SDP HR would be equal to the overall HNDA estimates of 'need and demand' (SPP (2010) para 70 and Glossary and PAN 2/2010 Glossary). As well as identifying HRs, an SDP was also expected to identify HLRs for the SDP area and for each LDP area. The Glossary of PAN 2/2010 advises that the HLR is '*the amount of land required to be allocated for housing to meet the identified HR*'.

2.11 SPP (2010) allowed wider strategic economic, social and environmental 'policy objectives' to be taken in to account (para 70) when determining the HR for an area. It was on this basis that SPP (2010) stated that the scale and distribution of growth in an area need not reflect past trends. Yet this part of SPP (2010) may not have been sufficiently clear if it meant that **a)** the 'overall' HR for the plan area could be different to the 'overall' HNDA assessed levels of need and demand, or **b)** whether this provision related only to how the overall need and demand could be **redistributed to different parts of an SDP area**, for example when setting HRs or HLRs for each LDP area.

2.12 This potential for misinterpretation was further compounded because the following two sentences of SPP (2010) allowed planning authorities to direct development to particular locations to achieve desired policy outcomes. In these circumstances SPP (2010) confirmed that 'the planned level or direction of growth need not reflect past trends'. However, SPP (2010), read as a whole and together with its associated PAN (PAN 2/2010), expected that HRs would equal HNDA estimates of need and demand, and that the HNDA was to be 'the' evidence base for setting HRs and HLRs in the Development Plan. SPP (2010) also expected SDPs to identify the HLR for the SDP area and indicate where land should be allocated in LDPs to meet requirements up to year 12 beyond the predicted year of plan approval and an indication of the possible scale and location of housing land up to year 20.

2.13 Accordingly, SPP (2010) expected that the overall HNDA estimates of need and demand would be met in full when SDPs set the overall HR and HLR for their area, no matter how these requirements were distributed within that area. SPP (2010) also expected that a generous supply of appropriate and effective sites should be available to ‘meet’ need and demand. SPP (2010) expected SDPs to:

- a. Set the overall scale of the HR for the SDP area up to SDP year 12 / LDP year 10 to equal the HNDA estimates of need and demand for the SDP area for those periods;
- b. Set HRs for each LDP area up to SDP year 12 / LDP year 10, taking in to account any redistribution of need and demand within the SDP area ensuring that the sum of HRs for all LDP areas equals the overall HNDA estimates of need and demand for the SDP area for that period;
- c. Set the overall SDP HLR to meet the SDPs overall HR, and set HLRs for each LDP area to meet their respective HRs - in city regions, LDPs cannot set their own HSTs for the period up to SDP year 12 / LDP year 10, nor can they change this figure since identifying it is the role of an SDP;
- d. Indicate where land should be allocated by LDPs to meet the HLRs of the SDP up to year 12 (2024) and provide an indication of the possible scale and location of housing land up to year 20 (2032); and
- e. Identify how much of the HLR **should** be met by site allocations that are ‘**capable**’ of development by the end of year 7 (2019) (para 72) – i.e. SPP (2010) did not intend that an ‘interim’ HR or HLR be set for the end of year 7 since it was clear that the HLR was to be set **only** for the period up to the end of SDP year 12 / LDP year 10.

### ***Generosity in the Supply and Effective Housing Land***

2.14 SPP (2010) expected development plans to provide a ‘generous’ housing land supply. Under SPP (2010), the act of maintaining a continuous five-year effective housing land supply would ensure that a ‘generous supply of land for house building’ would be maintained (para 75) – i.e. the amount of generosity was not pre-determined by any specified requirement to provide or not exceed a particular amount of additional land above the HR.

2.15 SPP (2010) expected the amount of ‘generosity’ in the supply to be informed by the overall capacity and number of sites that would need to be provided to allow enough homes to be developed within the plan period to meet the HLR, considering the start dates and rates of programming anticipated for the development of those sites, and that not all of their capacity may be developed within the plan period. As such, SPP (2010) did not require a further 10 – 20% generosity margin to be added to the HR or HLR of an SDP to ensure that a ‘generous’ supply of housing land would be made available by any LDP.

2.16 There was no nationally prescribed method for how any calculation to measure the adequacy of the five year effective housing land supply should be carried out. However, in the context of SPP (2010), PAN 2/2010 provides advice on what ‘figure / number / requirement’ the adequacy of the effective housing land supply should be measured against. PAN 2/2010 advises that the adequacy of the five year effective land supply should be measured against the HLR, albeit that it provides no specific advice on how such a calculation should be carried out.

## Scottish Planning Policy (2014)

### *Housing Supply Targets & Housing Land Requirements*

2.17 For the next generation of development plans, SPP (2014) significantly changes the national policy approach on how development plans should plan for housing. SPP (2014) expects that the HNDA estimates of need and demand will be used to provide only **'part'** of the evidence base to inform LHS and Development Plans. It does not require the HNDA estimates of need and demand to be transposed directly into an SDP as the Housing Supply Target (HST). Rather, setting the HST is to be the next separate stage in the process, after the HNDA estimated of need and demand has been reported.

2.18 SPP (2014) is clear that the HST represents a policy interpretation of the HNDA. It is a **'policy view'** on the number of homes **'the authority has agreed'** will be delivered over the SDP period (SDP year 12 and 20 and LDP year 10). Under SPP (2014), an SDP is to identify a HST for the SDP area and if different the functional housing market area(s) and for each of the associated LDP areas for the periods up to the end of SDP years 12 and 20 – the HST is also to be split into market and affordable housing sectors.

2.19 SPP (2014) expects that an authority's policy view on the HST will consider those factors which may have an impact on the rate and volume of housing delivery, such as wider economic, social and environmental factors, issues of capacity, resources and deliverability etc – i.e. no longer just 'policy objectives' – alongside the HNDA estimates of need and demand when it settles on the agreed figure for the number of new homes that will / can be built within the plan period. This policy view can be different to the HNDA estimates of overall need and demand, including their geographies and timescales.

2.20 Importantly, if justified, the agreed HST can be set lower or higher (overall, or for any particular part of the SDP area or through time) than the HNDA estimates of need and demand – e.g. it could be set lower than estimates of need and demand to take into account any limitations on the capacity and resources to deliver affordable housing etc. An agreed HST should be reasonable, properly reflect the HNDA estimate of demand in the 'market' sector and be supported by compelling evidence.

2.21 Within the overall HST, plans are also expected to indicate **'the number of new homes to be built over the plan period' – i.e. that part of the HST to be set for the period up to SDP year 12 / LDP year 10.** This is *similar* to the former SPP (2010) 'Housing Requirement', **but the new SPP (2014) does not expect SDPs to set 'Housing Requirements'.** This is a significant change in the national policy approach.

2.22 By removing the expectation that SDPs set 'Housing Requirements' SPP (2014) confirms that the HST can now be set lower than overall HNDA estimates of need and demand. Whilst the HST is to reflect HNDA estimates of market demand, the overall 'number of new homes to be built over the plan period' is to be reasonable, realistic and deliverable, including consideration of the resources and capacity to deliver housing, including affordable housing.

Taking account of these wider considerations could mean that the HST that is agreed for an SDP area should be reduced relative to the overall HNDA estimates of need and demand, if justified by 'compelling evidence'.

2.23 The agreed HST is therefore to be the policy view of the authority preparing the plan concerning the overall amount, spatial and temporal distribution of housing to be built within an SDP area and its associated LDP areas. As such, in city regions, LDPs cannot set their own HSTs for the period up to SDP year 12 / LDP year 10, nor can they change this figure since identifying it is the role of an SDP.

2.24 SPP (2014) expects that once the HST is agreed for the period up to SDP year 12 / LDP year 10, the strategic planning authority is then to add further generosity by increasing the HST by a margin of 10 – 20%, justified as appropriate, to establish the HLR for SDP area as a whole and for each associated LDP area. This generosity is built in to the HLRs so the capacity of the housing land supply will provide sufficient flexibility and a range and choice of site types and sizes to address any unforeseen circumstances that may arise when a plan is operative. Generosity is added up-front by an SDP in anticipation of some sites not becoming effective or becoming non-effective during the plan period and to ensure that, notwithstanding this, sufficient effective land will be available to deliver the agreed HST and while minimising the potential need to consider approving housing development on land not identified by the plan as suitable in principle for that purpose.

2.25 Importantly, under SPP (2014) in city regions LDPs are not to set their own HLRs because this is the role of the SDP. LDPs must allocate sufficient and appropriate housing land 'to meet' the HLR set for them by an SDP to ensure 'a generous supply of land for housing' is provided. SDPs are to identify the amount and broad locations of land which should be allocated by LDPs to meet the HLR up to year 12, and provide a broad indication of same by LDP area for years 12 to 20. Planning authorities should be confident in allocating sites that the land can be brought forward for development and that the range of sites allocated will enable the HST for their area to be met (SPP 2014 para 119).

### ***Effective Housing Land***

2.26 SPP (2014) expects that planning authorities will ensure there is always 'enough' effective housing land for at least five years. However, there continues to be no nationally prescribed method for how any calculation to measure the adequacy of the five year effective housing land supply should be carried out. SPP (2014) requires enough land to be **allocated** which is effective or able to be made effective **to meet** the HLR, and thus to enable the HST to be met, even if unforeseen circumstances arise when the plan is operative. However, SPP (2014) **does not** state whether the adequacy of the effective land supply should be measured against the HST figure or the HLR figure (i.e. the HST with 10 - 20% generosity added).

2.27 For as long as PAN 2/2010 remains in place, it provides advice on what figure the adequacy of the effective housing land supply should be measured against (as explained above). However, PAN 2/2010 reflects the previous policy intentions and approach of the reviewed and revoked SPP (2010) that it was

published to complement. PAN 2/2010 advises that the adequacy of the effective housing land supply should be measured against the identified Housing Land Requirement which under the previous SPP (2010) was to be equal to the Housing Requirement, not greater than it.

2.28 Under SPP (2014) the HST is to be a policy view on the number of homes an authority has agreed will be built during the plan period, taking into account HNDA estimates of need and demand as well as other material considerations. Under SPP (2014) the HLR has an additional 10-20% 'generosity' built-in to it to ensure plans provide more than enough housing land to meet the agreed HST, whilst allowing some sites to become non-effective during the plan period. Consequently, for the next generation of development plans prepared under SPP (2014), monitoring the adequacy of the five year effective housing land supply against a HLR figure with additional generosity built-in would mean that:

- authorities would be expected to ensure that more homes can be and are anticipated to be built during the plan period than the number of homes they have agreed can be built;
- the purpose for including an additional 10 – 20 % 'generosity' in the land supply above an agreed HST would be eliminated because:
  - if the monitoring approach were to use the HLR figure the in-built 'generosity' within the HLR would make the maintenance of an adequate five-year effective land supply more challenging than would be necessary to deliver the agreed HST; and because
  - the purpose of adding generosity to the HLR up-front is to allow some sites to become non-effective when the plan is operative whilst, notwithstanding this, still allow the plan to provide enough effective land to enable the HST to be met. However, an effective land supply calculation based on providing sufficient effective land to meet the HLR would require all sites to remain effective when the plan is operative, thereby **militating against** the provision of generosity in the first instance.

2.29 As such, for the next generation of development plans applying the out-of-date advice set out in PAN 2/2010 on the approach to calculating the adequacy of the five year effective housing land supply would contradict, counteract and undermine the policy approach and intention of SPP (2014).

2.30 SPP (2014) expects the next generation of plans to allocate enough land '**to meet**' the HLR so they provide a 'generous' land supply that has more capacity than the agreed HST. In so doing plans will provide sufficient flexibility in their supply of housing land so the number of homes the authority has agreed will be delivered can be built by housing providers. For the next generation of development plans the adequacy of the five year effective housing land supply should be measured and monitored against the HST set up to the end of SDP year 12.

2.31 For this reason there is an issue in terms of the reviewed intentions of SPP (2014) and the read-across between it and the out-of-date advice in PAN 2/2010 on how SPP should be interpreted and applied. SPP 2014 and advice from the relevant parts of PAN 2/2010 are not in accordance with one another.

2.32 PAN 2/2010 is currently under review, and a draft of the replacement PAN has been issued for consultation the period for which has now closed.

## Key Differences between Scottish Planning Policy 2010 and 2014

### Housing Supply Targets, Housing Requirements and Housing Land Requirements

#### SPP (2010)

- SPP (2010) expected the HNDA estimates of housing need and demand, HRs and HLRs to be the same figures for an SDP area overall – an alternative spatial distribution of the estimated need and demand than suggested by the outputs of the HNDA could be followed within that area, but only for policy reasons or if there were environmental or infrastructure constraints to the HNDA estimated distribution;
- Under SPP (2010) a ‘generous’ land supply would be provided if an authority could ensure that sufficient effective land would be available for the construction of homes over the next five years – i.e. generosity was not to be added to a ‘*Housing Requirement or Housing Land Requirement*’ already set by an SDP for an LDP, rather generosity was to be provided by maintaining an adequate effective five-year land supply;
- As such, SPP (2010) expected the amount of ‘generosity’ in the supply to be informed by the overall capacity of sites that were to be provided by LDPs to allow enough homes to be built within the plan period to meet the HLR (the same figure as the HR), considering the start dates and rates of programming anticipated for the development of those sites, and that not all of their capacity may be developed within the plan period;
- Consequently, SPP (2010) may have implicitly expected the capacity of the LDP housing land supply to be greater than the HR and HLR set by the SDP for the LDP, but SPP (2010) did not specify a generosity margin to be provided or not exceeded;
- LDPs are to allocate a range of sites which are effective or able to become effective during the plan period **to meet** the SDP HLR up to LDP year 10;
- SPP (2010) did expect SDPs to set out how much land should be capable of development by the end of year 7, but importantly it did not expect such a figure to be set as a ‘Housing Requirement’ or ‘Housing Land Requirement’.

#### SPP (2014)

- For the next generation of SDPs, the new SPP (2014) allows planning authorities to take into account a wider range of factors as material considerations when setting HSTs, which could be set lower (or higher) or have a different spatial or temporal distribution than the overall HNDA estimates of need and demand, provided the estimate of market demand is properly reflected;
- Importantly, unlike SPP (2010), the new SPP (2014) does not expect SDPs to set ‘Housing Requirements’;
- SPP (2014) expects SDPs to indicate the ‘*number of new homes the authority **has agreed** will be built over the plan period – i.e that part of the HST set up to the end of SDP year 12*’ - this figure can be lower than the HNDA estimates of need and demand for the plan area as a whole and for different parts of the plan area, and it **can only be derived by following the full methodology of SPP (2014)**;

- If SPP (2014) were interpreted and applied ‘as a whole’ in the preparation of an SDP, it is possible that the authority preparing a plan could agree to set different (lower) more reasonable and deliverable HSTs than HNDA estimates of need and demand if it was of the view that the original HNDA estimates were not reasonable or deliverable;
- SPP (2014) expects that once ‘*the HST set up to the end of SDP year 12*’ is agreed by the authority preparing the plan a further 10 – 20% generosity factor should then be added to this figure to calculate the HLR figure up to SDP year 12 or LDP year 10;
- SPP (2014) does not expect an SDP to set out how much land should be capable of development by the end of year 7 and a ‘generosity’ factor should not be added retrospectively to any ‘figure’ set by an SDP for the period to the end of year 7, should there be one.

### Key points to note

- **SPP (2010) and SPP (2014) confirm that in city regions LDPs have no role in setting HSTs, HRs or HLRs - this is the role of the SDP.**
- **Under SPP (2010) the term ‘Housing Requirement’ described ‘*the number of new homes to be built during the plan period to fully meet need and demand*’;**
- **Under SPP (2014), a ‘generosity’ factor of 10 – 20% should be added to the ‘*number of new homes the authority has agreed will be built during the plan period – i.e that part of the HST set up to the end of SDP year 12*’:**
- **Under SPP (2014) the Housing Supply Target up to SDP year 12 – i.e. ‘*number of new Homes to be built during the plan period*’ - is not derived in the same way as what was known as the ‘Housing Requirement’ under SPP (2010). These terms are therefore not interchangeable because they do not mean the same thing;**

### Effective Housing Land

- Both SPP (2010) and SPP (2014) expect that ‘enough’ effective housing land is maintained at all times for the next five years;
- PAN2/2010 expects the adequacy of the five year effective housing land supply to be measured against the Housing Land Requirement, which is normally set up to SDP year 12 / LDP year 10;
- However, due to the change in the national policy approach between SPP (2010) and SPP (2014) the next generation of plans will set their HLRs higher than the ‘agreed HST up to SDP year 12’ because an additional 10 – 20% generosity will be added to the HST to set HLR. This is to help ensure the next generation of plans make more than enough land available so the HST can be met even if sites become non – effective when plans are operative. This will minimise any need to consider approving planning permission for housing development on land not identified by the LDP as suitable in principle for that purpose to ensure a five years’ effective housing land supply is maintained;
- For the next generation of development plans the adequacy of the five-year effective housing land supply should be measured against the HST, as measuring this against the HLR would contradict, counteract and undermine the new policy approach and intention of SPP (2014);
- PAN 2/2010 is currently under review.

## Synthesis of National Planning Policy Issues as the relate to East Lothian's Proposed Local Development Plan

### Key points to note

- SPP (2010) expected SDP1 to set HRs and HLRs up to SDP year 12 (LDP year 10) for the SDP area as a whole and for each LDP area. Whilst HRs and HLRs set for each LDP area did not need to match the HNDA estimated need and demand for those areas, the overall HRs and HLRs set for each LDP within the SDP area were to equal overall HNDA estimates of need and demand for the SDP area as a whole;
- Whilst the previous SPP (2010) expected SDP1 to set out how much land should be capable of development by the end of SDP year 7 (LDP1 year 5), it did not expect such a figure to be set as a 'Housing Requirement' or 'Housing Land Requirement';
- LDP1 must conform to SDP1. It would not be appropriate to retrospectively increase the HR or HLR set by SDP1 for LDP1 by a further 10 - 20% in the preparation of LDP1. Similarly, such a 'generosity' factor should not be applied retrospectively to any 'figure' set by a SDP1 for the period to the end of year 7. Doing so would inappropriately conflate the different policy approaches of SPP (2010) and SPP (2014).
- Under SPP (2010), the provision of 'enough effective housing land for the next five years' was sufficient to ensure that a 'generous supply of land for house building' would be available. The amount of generosity provided was to be supply led - i.e. informed by the number, capacity, type and size of sites that should be allocated so enough homes can be built in the plan period to meet the Housing Requirement, by anticipating reasonable start dates and rates of development and, where relevant, that not all of their capacity may be developed in the plan period. This means that an LDP may need to provide a housing land supply which has a higher overall capacity than the HLR set for it by the SDP to ensure that the SDP HR/HLR can be met. However, SPP (2010) did not set out a specific margin of generosity to be provided or not exceeded in the supply;
- Because SDP1 was prepared under SPP (2010), the SDP Housing Land Requirement set for LDP1 should provide the basis against which the adequacy of the five-year effective housing land supply should be measured;
- It would not be appropriate to measure the adequacy of the five-year effective housing land supply for LDP1 against a new HR or HLR derived at LDP stage that is inflated by a further 10 - 20%. Doing so would inappropriately conflate the different policy approaches of SPP (2010) and SPP (2014), and make the maintenance of a five-year effective housing land supply unnecessarily challenging since the basis for the measurement would be wrong;
- If a further 10 – 20% generosity were added to the SDP1 Housing Requirements to inflate the Housing Land Requirements for LDP1, and if a supply led approach were then also to be applied to these inflated HLRs by programming new housing land allocations to meet them, this would add further additional generosity to the supply as well as make the maintenance of a five-year effective housing land supply significantly more challenging than necessary to meet the SDP1 HR, and thus further increase the likelihood of plan failure consequent on a perceived shortage of a five years' supply of effective housing land.

## SESPAN EXAMINATION

3.1 This section discusses relevant findings of the examination of the first SDP for Edinburgh and South East Scotland (SDP1), to which the Proposed Local Development Plan (PLDP1) for East Lothian must conform, taking into account the Reporter’s interpretation and reasoning, conclusions and recommendations. SDP1 was examined in the context of SPP (2010). In respect of housing issues, the SDP1 examination reported a number of findings and recommendations that were accepted by Scottish Ministers in their approval of SDP1, and these issues are summarised and discussed below.

### Issue 15 – Housing Land Requirement

3.2 SESplan’s first Housing Need and Demand Assessment (HNDA1) for SDP1 provided the evidence base for defining Housing Requirements (HRs) and Housing Land Requirements (HLRs) for SDP1. The SESplan HNDA1 was produced on the basis that the entire SESplan area is one functional housing market area, albeit there may be smaller sub-market areas operating within it. An outcome of the examination of SDP1 was that the SESplan area could be considered as a single functional housing market area (Issue 15 para 31 – 33) and that sufficient land is needed to meet the assessed levels of need and demand set out in Table 2 below.

	<b>Assessed Housing Requirement 2009 - 2019</b>	<b>Assessed Housing Requirement 2019 – 2024</b>	<b>Assessed Housing Requirement 2009 - 2024</b>	<b>Assessed Housing Requirement 2024 - 2032</b>
<i>Edinburgh</i>	34,290	14,200	48,490	22,505
<b>East Lothian</b>	<b>5,210</b>	<b>2,740</b>	<b>7,950</b>	<b>3,820</b>
<i>Fife</i>	16,260	7,400	23,660	10,363
<i>Midlothian</i>	1,700	500	2,200	171
<i>Scottish Borders</i>	5,955	2,780	8,735	3,802
<i>West Lothian</i>	11,420	5,090	16,510	7,338
<b>SESplan</b>	<b>74,835</b>	<b>32,710</b>	<b>107,545</b>	<b>47,999</b>

Source: SESplan Examination Report Table 1, page 182 (April 2013)

3.3 The SESplan HNDA1 includes an assessment of need and demand for housing at the local level and for the city region as a whole. While the local area outputs should be seen as the need and demand that is generated within them, these figures are not the requirements to be met in the individual local areas. Each local area is not a self contained housing market area, and need and demand need not be met in the local area where it is perceived to have originated.

3.4 However, SESplan did not accept that the HNDA1 estimates of need and demand should be used to set 'Housing Requirements' for SDP1 or LDPs, noting **two main points: a)** that the HNDA1 estimates were trend based; and **b)** too optimistic (particularly in the short term) given reduced levels of construction in the sector since the start of economic recession in 2008:

- SESplan's Proposed SDP1 therefore did not set HRs or HLRs, but instead allowed for some additional housing land allocations to be made by LDPs;
- SESplan's view was that there was sufficient land already allocated in development plans (for circa 126,000 homes) that would allow need and demand up to 2024 (for circa 107,550 homes) to be met if that land were to be developed through time at a rate that matched the HNDA1 estimates of need and demand for new housing through time;
- However, when Proposed SDP1 was being prepared the programme of house completions from the established housing land supply (that was agreed with the house building industry through the housing land audit process) reflected the low levels of demand and weak housing market prevalent at that time – the rate of development anticipated by housing providers was low and reduced significantly from pre-recession levels. The result was that the development of land which was already available for house building was anticipated to take longer to develop than it did / would in better economic conditions;
- Much of the established housing land already available for house building was therefore not programmed to be fully developed within the SDP1 period up to 2024, with some of the homes programmed to be built in the period 2024 – 2032 and beyond;
- It was SESplan's view that the additional allocations proposed by it would be sufficient to address the perceived 'shortfall' of housing land that would be needed to meet need and demand in the short to medium term, particularly if economic conditions improved and the established land supply were to be developed faster together with the new allocations;
- However, based on the programming of the established land supply when the plan was being prepared together with the numerical scale of new housing allocations proposed by SESplan, the Proposed SDP in effect did not 'meet' the HNDA estimates of need and demand though time, resulting in a perceived shortfall of land for some 11,000 homes in the period up to 2024;
- However, given the amount of land already allocated, together with the additional allocations proposed, SESplan nevertheless felt that its approach was realistic and responsible, since there was sufficient capacity in existing allocations to meet need and demand if they were to be developed at a faster rate than programmed in the midst of economic recession – focusing on delivery of committed strategies was SESplan's priority;
- SESplan was of the view that meeting need and demand would be possible under its approach if levels of demand increased and the housing market and sales rates improved to meet this;
- SESplan did not however clearly set out what the consequential HRs or HLRs would be under its approach, since it essentially made provision for some new housing land allocations to be made that would help need and demand to be met;
- Because of this there was no way to measure whether an effective five year housing land supply was being maintained if the SDP became operative in its proposed format, since there would be no HLR set out in it against which this could be measured.

3.5 Notwithstanding SESplan’s view, the examination recommended that:

- **in respect of point a)**, that SESplan’s issue was with the HNDA1 methodology, which had already been certified by the Scottish Government as credible and robust, and so was an issue that should not normally be considered at examination;
- **in respect of point b)**, accepted that SESplan’s view could be pessimistic or realistic, but found that its position did not derive from the pursuit of any wider strategic, economic or environmental ‘policy objective’, and was not supported by nearly all of those who submitted representations to Proposed SDP1.

3.6 The examination therefore recommended to Scottish Minister’s that SESplan’s approach to planning for housing should not be supported, particularly since the Scottish Government has identified south-east Scotland as the key driver of the Scottish economy. In line with the SDP1 examination report, Scottish Ministers agreed to modify SDP1 so that:

- a. the overall HNDA1 need and demand figures for the SESplan area were set as its ‘**Housing Requirements’ for the periods to 2019 and 2019 – 2024;**
- b. it instructed Supplementary Guidance on Housing Land (SGHL) to be prepared that would take the **Housing Requirements** – i.e. HNDA estimates of need and demand - for each LDP area set out in Table 1 of the Examination report (page 182) and translate them into **Housing Land Requirements** for those areas following an analysis of how the needs and demands of the whole SESplan area could be best met (para 18);
- c. Specifically, a role set for the SGHL required that it was to confirm how much of the City of Edinburgh’s housing needs and demands need be met by ‘housing land allocations’ in each of the other LDP areas (Examination Report: Issue 15 para 18 and 19);
- d. The report goes on to say that the role originally envisaged for Supplementary Guidance by the Act was not to set ‘housing and housing land requirements’ for each of the LDP areas, but that in the circumstances of the case that approach would minimise any delay in making additional land available to allow need and demand to be met;
- e. At paragraph 29 the report goes on to say:

*“The plan should therefore confirm that it is the role of the local development plans to make housing land allocations on sites which are effective, or capable of becoming effective, **so as to deliver the levels of house completions which would be necessary to meet those requirements which are to be specified in detail in the Supplementary Guidance.**”*

3.7 Policy 5: Housing Land confirms that the SGHL will identify how much land requires to be allocated in each of the LDP areas for the plan periods to 2019 and 2024. The SGHL was instructed to set out ‘Housing Land Requirements’ for the LDPs for each of the plan periods to 2019 and 2024 (Examination Report: Issue 15 para 18).

### Key points to note

The SESplan SDP1 examination found that, under SPP (2010), there is no difference in the meaning of the terms 'Housing Requirement' (number of new homes to be built over the plan period) and 'Housing Land Requirement' (total amount of land that needs to be allocated to meet HNDA estimates of need and demand / Housing Requirements) or how they should be interpreted when making housing land allocations to meet them.

## Issue 16 – Housing Land – Components of the Calculation

3.8 This issue principally concerned how assumptions ought to be made in relation to how different sources of housing land should be treated as contributing to the overall HLR calculation.

3.9 The thrust of the issue was if and how contributions from constrained sites and windfall sites ought to be handled by SDP1. The conclusion was that it will be for LDPs to determine the amount of effective land, and thus the amount of new housing land allocations that need to be made, since SDP1 is not a site specific plan.

3.10 The report goes on to say at paragraph 3 of the conclusions on this issue that:

*“the recommended modifications arising from Issue 15 will require the preparation of Supplementary Guidance to define the **Housing Requirements** for each of the six local development plan areas, consistent with enabling the overall assessed housing needs and demands of the SESplan area as a whole to be met”;*

### Key points to note:

Following the redistribution of need and demand from the City of Edinburgh to the surrounding LDP areas, the examination did not find that the Housing Land Requirements set for each LDP need to be increased by a further 'generosity' factor of 10 – 20% in the preparation of LDPs.

## Maintaining an Effective Five Year Housing Land Supply

3.11 The examination did not recommend any method of calculation for how the adequacy of the five year effective housing land supply should be calculated.

### Key points to note

The examination report states that:

- it should be the role of LDPs to make allocations on sites which are effective, or capable of becoming effective, so as to deliver the levels of house completions which would be necessary to meet the 'Housing Land Requirements' which are to be specified in detail in the Supplementary Guidance (Examination Report: Issue 15 para 23 and 29); and
- the allocation of land which has a higher overall capacity than the HR is likely, since not all of the sites will be or will become effective or be built out within the time-scales originally anticipated. Doing so will also minimise the potential need subsequently to grant planning permission for further unallocated sites in order to ensure the five years' effective housing land supply is maintained (Examination Report: Issue 15 para 3);

3.12 The implication for LDPs is that they will need to provide 'generosity' **in their supply of housing land** – i.e. the capacity of the supply will be greater than the Housing Land Requirement. However, the Examination did not find that the HLR should be increased, nor did it set a percentage for how much more land should be provided or not exceeded by an LDP to ensure sufficient generosity is provided.

3.13 The amount of land provided should be based on the number of sites needed to ensure sufficient completions can be achieved to meet the Housing Requirement, based on reasonable assumptions on their start date and rate / programming of development – i.e. **any likely level of generosity to be provided is to be supply-led.**

3.14 These assumptions should be ambitious, and based on what could be achieved with the house building industry's will and ability to vigorously recover from recession by pro-actively pursuing planning permissions and other statutory consent so they can meet need and demand within the necessary timescales (SESplan Examination Report Issue 15 para 13, 19 and 25).

## SESPLAN SUPPLEMENTARY GUIDANCE ON HOUSING LAND

### Housing Requirements & Housing Land Requirements

4.1 SESplan's SGHL was approved by Scottish Ministers on the 18<sup>th</sup> of June 2014 subject to modification (see sub-section on 'Effective Housing Land' below). It confirms that it has been prepared to set **HLRs** (Paragraph 1.2, 3.2, 3.4, 3.5, 3.6 and Table 3.1 and para 3.13, 3.15 and 3.16). The HLRs set for East Lothian by the SGHL are:

- SESplan SG HLR 2009 – 2019 = 6,250 homes
- SESplan SG HLR 2019 – 2024 = 3,800 homes
- SESplan SG HLR to 2009 - 2024 = 10,050 homes

4.2 However, although in conformity with SDP1 itself, the interim HLR up to 2019 seems at odds with the intention of SPP (2010) which only required SDP1 to identify how much of the HLR should be met by 'site allocations in local development plans that are **capable** of development by the end of year 7' – i.e. it did not require that figure to equal need and demand for that period, nor did it expect that figure to be confirmed as any type of 'requirement'. This is important because SPP (2010) and SPP (2014), **taken together with the current drafting of PAN 2/2010**, require the adequacy of the five year effective housing land supply to be measured against the HLR, **albeit with the intention that this would only be set to the end of SDP year 12 (or LDP year 10)**.

4.3 However, because SESplan did not provide any 'figures' for how much of the HLR should be met by 'site allocations in local development plans that are **capable** of development by the end of year 7' the examination had no option but to use the HNDA estimates of need and demand to set these figures. It may also be that because SESplan was perceived to be limiting the release of housing land that the examination recommended that these figures be set as a formal HLR to 2019 – i.e. to ensure more land releases earlier. These two HLRs then had to be reflected by SESplan in the SGHL and thus also by LDPs.

4.4 SDP1 and its associated SGHL require that the HLRs set for East Lothian for the period up to 2019 and for the period 2019 – 2024 need to be met by housing land allocations which can deliver 6,250 homes by 2019 and a further 3,800 homes in the period 2019 – 2024. However, for all of the reasons originally given by SESplan, the short term HR up to 2019 in particular is extremely optimistic and will be very challenging for housing providers to meet. Nonetheless, sufficient land should be released which could allow 6,250 homes to be built up to 2019 and a further 3,800 homes to be built up to 2024.

4.5 In order to meet the Housing Land Requirements, Table 3.2 of the SGHL sets out where there are likely to be shortfalls of housing land – i.e. the difference between the Housing Land Requirement and amount of housing land already available in an area. The SGHL refers to these shortfalls as 'additional allowances'. A shortfall of land for 3,560 homes is identified for East Lothian. However, paragraph 3.9 of the SG also notes that these shortfalls

will need to be re-assessed in the preparation of LDPs to demonstrate that the Housing Land Requirements (HLRs) set for each LDP area will be met by site allocations that can be developed within the relevant time periods to meet the HLRs.

4.6 This is likely to result in a supply of housing land which has a higher overall capacity than the HLRs, and additional housing land allocations that together have a higher overall capacity than the 'additional allowances / shortfalls'. This is because LDPs are to make allocations on sites which are effective or capable of becoming effective so as to deliver the levels of house completions which would be necessary to meet the HLRs, considering that not all of the sites may become effective or be fully built out in the time-scales originally envisaged. Providing generosity in the supply of housing land in this way will minimise any need to consider approving planning permission for housing development on land not identified by LDPs as suitable in principle for that purpose in order to ensure the five years' effective housing land supply is maintained (Examination Report: Issue 15 para 3).

#### Key points to note

- SPP (2010), the SESplan Examination Report, SDP1 itself and the SGHL do not require the HLR set for East Lothian to be increased by a further 'generosity' margin of 10 – 20% in the preparation of LDP1;
- The intention of all of these documents, taken together, is that any amount of 'additional capacity or generosity' provided by LDP1 above SDP1s HRs and HLRs shall be supply led, not 'Housing or Housing Land Requirement' led;
- SDP1 examination found that this is likely to result in the allocation of land in LDP1 which has a higher overall capacity than the SDP1 HLR for the LDP1 area, and the allocation of new sites that have a higher overall capacity than the SGHL 'additional allowances' for that LDP area;
- For the avoidance of doubt, this means that any amount of additional capacity in the LDP1 Housing Land Supply should be determined by the overall capacity of sites selected for allocation which can be programmed for development to meet the HLRs already set out by SDP1 and SGHL;
- The analysis as to how much land is required is to be based on reasonable assumptions on the start date and rates of development that can be programmed from sites during these periods;
- These assumptions should be ambitious, and based on what could be achieved with the house building industry's will and ability to vigorously recover from recession by pro-actively pursuing planning permissions and other statutory consents so they can meet need and demand within the necessary timescales (SESplan Examination Report Issue 15 para 13, 19 and 25);
- If a further 10 – 20% generosity were added to the SDP1 Housing Requirements to inflate the Housing Land Requirements for LDP1, and if a supply led approach were then also to be applied to these inflated HLRs by programming new housing land allocations to meet them, this would add further additional generosity to the supply as well as make the maintenance of a five-year effective housing land supply significantly more challenging than necessary to meet the SDP1 HR, and thus further increase the likelihood of plan failure consequent on a perceived shortage of a five years' supply of effective housing land.

## Effective Housing Land

4.7 SESplan's SGHL was approved by Scottish Ministers on the 18<sup>th</sup> of June 2014 on the proviso that a modification was made to it to remove a sentence which read:

*"Member authorities will base their calculation of the five year land supply on the period 2009-2024, taking into consideration housing completions."*

4.8 This sentence would have required the LDP planning authorities to base their calculation of the adequacy of the effective five-year housing land supply on the HLR set for the whole plan period to 2024, taking in to account completions since 2009. Scottish Ministers took no issue with this method of calculation, and offered no alternative, but their approval letter continued to state in relation to that sentence:

*"While it may be considered to provide useful further information or detail, the inclusion of this also gives rise to a potential inconsistency between SESplan itself and the supplementary guidance."*

4.9 The implication of this may be that Scottish Ministers were of the view that, to conform to SDP1, the five year effective land supply calculation should take into account SDP1s 'interim' HLR set up to 2019.

### Key points to note

- **The previous SPP (2010), taken together with PAN 2/2010, would expect the calculation on the numerical adequacy of the five-year effective housing land supply to be measured against an LDP HLR set for a 10 year period. In these circumstances, the calculation method set out by SESplan would have been the correct approach to follow;**
- **However, the introduction of the 'interim' HLR means an alternative approach may need to be followed to take account of the additional short term Housing Land Requirement introduced by Scottish Ministers.**

## CONSIDERATION OF MAIN ISSUES REPORT CONSULTATION RESPONSES

5.1 The following section explains the main points made through East Lothian Council’s LDP1 Main Issues Report (MIR) consultation. It summarises the responses made in relation to the MIRs approach to meeting SDP1s HLRs and maintaining an adequate five year supply of effective housing land. The Council’s response to the consultation responses is summarised in the following section on the PLDP1 approach.

### Summary of MIR Consultation Responses

5.2 Table 3 sets out the MIR preferred approach to meeting SDP1s HLRs. Table 3 is based on rates of housing completions that were anticipated through time from the established housing land supply as well as from the sites that were the preferred land allocations at MIR stage. Table 3 sought to demonstrate that the preferred sites at the time, in combination with the established housing land supply and a small allowance for ‘windfall’ housing development, could satisfy SDP1s HLRs for the plan period up to 2019 and for the plan period 2019 – 2024, and that an effective five- year housing land supply could be maintained with the MIR approach. Overall, a 12% generosity margin would exist in the housing land supply over the entire LDP1 period.

**Table 3: Main Issues Report Housing Land Requirements and Housing Land Supply**

PLANNING PERIODS	2009/10 – 18/19	2019/20 – 23/24	TOTAL TO 2023/24	2024/25 -31/32 <sup>(5)</sup>	Beyond 2031/32	TOTAL SUPPLY
<b>SDP Housing Requirement to 2024</b>	<b>6,250</b>	<b>3,800</b>	<b>10,050</b>	<b>3,820</b>	<b>0</b>	<b>13,870</b>
Dwelling Completions 2009 – 13	1,321	0	1,321	0	0	1,321
Contribution from Established Land Supply <sup>(1)</sup>	2,939	1,793	4,732	0	0	4,732
Contribution from Preferred MIR Sites	2,126	2,416	4,542	1,198	0	5,740
Contribution from Future Windfall Sites <sup>(2)</sup>	220	110	330	110	0	440
Loss of Supply to Dwelling Demolitions <sup>(3)</sup>	0	0	0	0	0	0
<b>Sub-Total Housing Land Supply</b>	<b>6,606</b>	<b>4,319</b>	<b>10,925</b>	<b>1,308</b>	<b>0</b>	<b>12,233</b>
<i>Contribution from Blindwells</i>	<i>0</i>	<i>363</i>	<i>363</i>	<i>801</i>	<i>436</i>	<i>1,600</i>
<b>Grand Total Housing Land Supply</b>	<b>6,606</b>	<b>4,682</b>	<b>11,288</b>	<b>2,109</b>	<b>436</b>	<b>13,833</b>
<i>Shortfall / Surplus of Housing Land<sup>(4)</sup></i>	<i>-356</i>	<i>-882</i>	<i>-1,238</i>			
<i>% generosity in land supply to 2024</i>			<i>12</i>			

<sup>(1)</sup> Includes a contribution of 80 dwellings from small sites (less than 5 units) programmed 2013–18 as per Agreed 2013 Housing Land Audit; <sup>(2)</sup> SESplan’s windfall assumption for East Lothian has been used at this stage, but this may be reviewed for the Proposed LDP; the annual average windfall contribution for East Lothian 2008 – 2013 was higher; <sup>(3)</sup> SESplan’s demolitions assumption for East Lothian has been used at this stage, but this may be reviewed for the Proposed LDP; <sup>(4)</sup> A negative number indicates a surplus of housing land against the housing requirements; <sup>(5)</sup> For the avoidance of doubt, the figure for the period 2024 – 32 is not part of SDP1s housing requirement, but is an estimate of need and demand for housing during that period from the SESplan HoNDA.

5.3 In general, some respondents to the MIR supported the preferred approach to planning for housing set out in the MIR and some did not, whilst some others did not sufficiently understand the issue to make any meaningful comment.

5.4 Of those who supported the MIR preferred approach the majority felt that it was a reasonable reflection of how SDP1 and associated SGHL HLRs could be met, with some respondents indicating that the rate of development that would be needed was very optimistic in light of past trends. Those who opposed the approach could broadly be split in to two categories: 1) those who felt too much land was being made available (mostly members of the public) and 2) those who thought that not enough land was being made available (mostly landowners/developers/agents).

5.5 Of those who felt too much land was being made available, one pointed to the 'additional allowances' set out in SDP1s SGHL as an indication of the amount of new land that should be allocated, while others generally felt that the scale of the HLR was unjustified in light of past and perceived future trends and / or would undermine East Lothian's character, identity, amenity and infrastructure.

5.6 Of the respondents who thought that not enough land was being made available some acknowledged (including Homes for Scotland) that a significant increase in annual build rate would be required and that the Council cannot control what the market is able to or seeks to deliver in any given year. Nonetheless, the main reasons for their views related to the policy and technical considerations set out below.

### ***Housing Land Requirements & Supply***

5.7 Homes for Scotland and the majority of developers / landowners / agents who objected to the preferred approach set out in MIR were of the view that SDP1 Policy 5: Housing Land as well as its associated SGHL set out HSTs, not HLRs. In that context, these respondents wanted the Council to selectively apply certain aspects of SPP (2014) – i.e. those parts of SPP (2014) in respect of 'generosity' where 10 – 20% is to be added to 'the number of new homes to be developed within the plan period' to set higher HLRs for the emerging LDP1 than required by SDP1 and the SGHL.

5.8 The implication of the respondents approach is that new and higher HLRs would need to be set out in the PLDP1 for East Lothian for each of SDP1 plan periods in comparison to those already confirmed by SESplan's approved SGHL– e.g.:

- SESplan SG HLR 6,250 homes 2009 – 2019 would = 7,500 homes (@ +20% generosity)
- SESplan SG HLR 3,800 homes 2019 – 2024 would = 4,560 homes (@ +20% generosity)
- SESplan SG HLR 10,050 homes to 2024 would = 12,060 homes (@ +20% generosity)

### ***Effective Land Supply***

5.9 Some respondents were of the view that the adequacy of the five year effective housing land supply should be calculated taking into account SDP1s 'interim' HLR set up to 2019 separate from the HLR up to 2024.

### ***General Points***

5.10 To give housing providers the best possible opportunity to maximise the contribution it can make to meeting East Lothian's HRs some respondents request that the Council:

- Plan for a generosity allowance at the upper end of the 10-20% scale recommended by SPP (2014);
- Allocate a range of sites, including in terms of size, location and type (greenfield / brownfield);
- Be flexible in respect of any preferred spatial strategy if this will help deliver houses in the volumes needed;
- Identify a range of sites over and above those already identified as preferred in the MIR.

5.11 Respondents also strongly urged the Council to review its approach in respect of Development Management decisions on windfall housing sites by continuing to operate its Interim Planning Guidance: Housing Land Supply. Respondents felt that if there were an active and declared strategy to help address East Lothian's housing shortfall then there would be more justification for the Council's optimistic early programming of delivery on new sites.

### ELC Response to Main Issues Report Consultation Responses

#### *Housing Land Requirements & Supply*

6.1 SDP Policy 5: Housing Land sets out a requirement to allocate sufficient land in the SESplan area to enable the delivery of 107,545 houses in the period to 2024, and of that total there is a requirement for sufficient land to be allocated to enable 74,835 houses to be built by 2019. The land currently committed for housing development can contribute towards these totals.

6.2 SESplan's SGHL confirms the distribution of the overall HRs for the SESplan area, and sets HLRs for each LDP area (Paragraph 1.2, 3.2, 3.4, 3.5, 3.6 and Table 3.1 and para 3.13, 3.15 and 3.16). The SGHL has been approved by Scottish Ministers and now forms part of the statutory Development Plan.

6.3 Whilst the pre-amble to SDP Policy 5: Housing Land is clearly entitled 'Housing Land Requirement', the meaning of Policy 5: Housing Land may be open to some misinterpretation if viewed in the context of SPP (2014) because:

- In line with SPP (2010), SDP Policy 5 sets the Housing Requirement, which should be the same figure as the HST for LHS purposes (HNDA estimates of need and demand) and the HLR - put another way, under SPP (2010) these terms all describe *'the number of new homes to be built during the plan period'*;
- Under the new SPP (2014), a 'generosity' factor of 10 – 20% should be added to the ***'number of new homes to be built during the plan period – i.e that part of the HST set up to the end of SDP year 12'***;
- However, as set out in Section 2, under SPP (2014) the ***'number of new homes to be built during the plan period – i.e that part of the HST set up to the end of SDP year 12'*** does not have the same meaning as what was known as the 'Housing Requirement' under SPP (2010).

6.4 **This is because under SPP (2014) the process, method, terminology, policy principles, requirements and timescales for how development plans should plan for housing are entirely different to those of SPP (2010) under which SDP1 was approved by Scottish Ministers. The SPP 2010 term 'Housing Requirement' and SPP 2014 reference to the 'number of new to be built over the plan period – i.e that part of the HST set up to the end of SDP year 12' are not interchangeable because they do not have the same meaning.**

6.5 As such, when the Council considered objections to the approach set out by the MIR, a key consideration was whether it would be competent and appropriate to selectively apply certain aspects of SPP (2014) to the HR and HLRs of SDP1 and its associated SGHL that were prepared under SPP (2010), and which have already been approved by Scottish Ministers. The Council's conclusion in these matters is as follows:

- SPP (2014) cannot be applied retrospectively or selectively to SDP1 or its SGHL – SPP (2014) is to be read and applied as a whole and this cannot be done as SDP1 is already approved and was prepared under SPP (2010);
- By law, LDP1 must conform to SDP1, and this conformity should be extended to the definition, interpretation and application of its terms, policies, guidance and requirements, even if these stemmed from SPP (2010) which has now been reviewed, revoked and replaced;
- LDP1 cannot modify its Housing Land Requirement as this is the role of SDP1;
- An important consideration is if SDP1 had been prepared under SPP (2014) the outcome of SDP1 in terms of its HLRs could have been entirely different, very likely in line with SESplan's original approach to its Proposed SDP1 – i.e. setting them lower than the approved SDP1;
- Additionally, the objectors to the LDP1 MIR did not want the Council (and could not seek) to apply those other aspects of SPP (2014) which could change the time periods of SDP1s HLRs and that would influence how much housing land should be effective when, and how the adequacy of the five year effective housing land supply should be measured – e.g. they do not wish to dispense with the 'interim' HLR up to 2019 set by SDP1;
- Notwithstanding this, the objectors did want the Council to selectively apply certain aspects of SPP (2014), namely the addition of a further 10 – 20% generosity to the SDP1 HLRs to 2019 and 2019 - 2024;
- The objectors approach would increase the amount of effective land that would need to be maintained when LDP1 is operative to a level above that required by SDP1 and the SGHL. This would make maintaining an adequate supply of effective housing land significantly more challenging than necessary when LDP1 is operative:
  - Put another way, the objectors approach would 1) increase the HLR of LDP1 above SDP1 and the SGHL, meaning 2) more land would need to be allocated by LDP1 and 3) because the HLR would be inflated (and is also to provide basis against which the effective housing land supply should be measured) would increase the potential likelihood for a case being made for approving planning permission for housing development on land not identified by LDP1 as suitable in principle for that purpose when LDP1 is operative;
- The new SPP (2014) needs to be read and applied 'as a whole' and this can only be done in the preparation of the next generation of plans;
- Overall, the objectors do not acknowledge that the extant SESplan SDP1 is not out-of-date even though it continues to implement the terms of SPP (2010).

6.6 **Accordingly, it would not be competent or appropriate for the Council to follow the objectors' approach. The HLR for LDP1 should be as set as it is by the approved SDP1 and its associated SGHL. The policy principles of the new SPP (2014) in respect of adding 10 – 20% 'generosity' to increase LDP1s HLRs should carry no weight in the preparation of LDP1 for East Lothian. It will be for the next generation of SDPs and LDPs to fully implement the terms of the new SPP (2014), read and applied as a whole.**

6.7 Notwithstanding this, and in line with the SDP1 examination findings, the capacity of the housing land supply in East Lothian should be greater than SDP1s Housing Land Requirements set for the area by the SGHL. This is because not all of the sites will become effective or be built out within the time-scales originally envisaged. Reasons for providing a housing land supply with a higher overall capacity than the HLR is to help ensure enough effective land is available at all times and to minimise the potential need to consider approving planning permission for housing development on land not identified as suitable in principle for that purpose by LDP1 when it is operative. As such, some ‘generosity’ in the supply of housing land should be provided by LDP1.

6.8 **However, there is no policy position or recommendation from the SDP1 examination or the approved SGHL specifying a minimum amount of land that should be provided by the emerging LDP1 above its HLR; there is also no policy position setting out the maximum amount of land that would be considered sufficient. As such, in the absence of any clear policy position on how much ‘generosity’ in the land supply should be provided and not exceeded, PLDP1 should have regard to the SPP (2014) margin of 10 – 20% generosity. However, PLDP1 should provide such a margin of generosity in its housing land supply, the full extent of which should be based on reasonable start date and programming assumptions for the development of homes from identified sources of housing land. This approach is reasonable because it:**

- offers some guidance and control over how much land is released, taking account of national planning policy;
- helps ensure enough effective housing land will be available at all times;
- helps to minimise the potential need to consider approving planning permission for housing development on land not identified as suitable in principle by LDP1 for that purpose when LDP1 is operative;
- does not make the maintenance of a five-year effective housing land supply unnecessarily challenging.

6.9 **The key issue for LDP1 is to ensure that it makes available an appropriate and sufficient amount of land by providing a full range and choice of site types and sizes in marketable locations that are effective or that can become effective to ensure housing providers can deliver homes to meet the Housing Land Requirement. In this regard the amount of housing land made available by PLDP1 should be informed by reasonable assumptions on start dates, programming of dwelling completions / rates of housing delivery from sites. These assumptions should be ambitious, and based on what could be achieved with the house building industry’s will and ability to vigorously recover from recession by pro-actively pursuing planning permissions and other statutory consent so they can meet need and demand within the necessary timescales (SESplan Examination Report Issue 15 para 13, 19 and 25).**

### ***Effective Land Supply***

6.10 PLDP1 will provide an appropriate and sufficient amount of housing land, with a range and choice of site types and sizes, that are effective or capable of being made effective and that could be built fast enough to meet SDP1 HLRs. Currently, PAN 2/2010 states that a site can only be considered effective when it can be demonstrated that within the next five years it will be free of constraints (i.e. the constraints currently defined by PAN 2/2010

'effectiveness' criterion) and that it can be developed for housing<sup>3</sup>. It further explains that not all of an effective site may be counted as part of the effective land supply if only a portion of it is programmed to be built in the next five-years. As such, assumptions on start dates and rates of development currently determine the extent to which a site (or portion of it) can be counted as 'effective' in a housing land audit (HLA).

6.11 PAN 2/2010 advises that the HLR is the basis against which the adequacy of the five year effective housing land supply should be measured. Importantly, SPP (2010) only intended that a HLR be set for SDP year 12 (LDP year 10). However, the introduction of the 'interim' HLR to SDP1, its associated SGHL and thus LDP1 will make the maintenance of an effective five-year effective housing land supply extremely challenging, if at all possible, particularly in the short term. Notwithstanding this, **based on the current PAN 2/2010**, the method for assessing the numerical adequacy of the 5-year effective housing land supply for LDP1 is set out in Advice Box 1 of PLDP1 and is repeated below:

#### **Advice Box 1: Calculating the Adequacy of the Five-Year Effective Housing Land Supply**

1. If more than five years of the first plan period remain, a pro-rata figure of the remaining Housing Land Requirement for that period shall be calculated by subtracting the completions achieved since the base date of SDP1 from the Housing Land Requirement for the first plan period, then dividing the net figure by the number of years remaining in the first plan period, and multiplying the annualised figure by five; or
2. If less than five years of the first plan period remain, a pro-rata figure of the annualised Housing Land Requirement for the second plan period shall be added to any shortfall figure from the first (calculated by subtracting completions achieved since the base date of SDP1 from the Housing Land Requirement in the first plan period); or
3. If less than five years of the second plan period remain, a pro-rata figure of the annualised housing need and demand estimate for the signpost period shall be added to any shortfall figure (calculated by subtracting completions achieved since the base date of SDP1 from the Housing Land Requirement for the plan period);
4. The recalculated Housing Land Requirement figure derived, as appropriate, from step 1), 2) or 3) above shall be compared to the amount of homes programmed to be developed in the next five years, based on the latest housing land audit (or any housing monitoring paper) to assess if there is a surplus or shortfall of homes programmed to be developed in the next five years;
5. To establish how many years of effective housing land supply these programming assumptions would yield, step 4) will be divided by step 1), 2) or 3) as appropriate and multiplied by five.

6.12 However, building homes at the rate needed to maintain an effective five year housing land supply at all times if calculated in this way will be extremely challenging for housing providers. As shown at Table 15 of Appendix 1, the delivery of SDP1s HLRs would require annual completion rates of

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<sup>3</sup> This is also repeated at para 123 of SPP2014

more than double the highest level ever achieved in East Lothian since 2001/02 (see also Appendix 1 para A1.13 – A1.15). In one year more than 2,000 homes would need to be built, which is more than quadruple the annual average completions achieved since 2001/02. This is particularly so consequent on the introduction to SDP1 through the SESplan examination of the 'interim' housing land requirement up to 2019. An unprecedented rate of house building will need to be sustained throughout the whole plan period and this rate and volume of housing delivery is being planned for during a period of significant infrastructure and funding constraint.

6.13 Importantly, the Scottish Government is currently reviewing the PAN 2/2010 approach to assessing the numerical adequacy of the five-year effective land supply. The current PAN 2/2020 approach monitors the number of homes that are programmed to be built at a point in time: it does not monitor the amount of land that is available for house building and that could be considered effective if there were a will and ability to develop homes on it faster. Based on this approach, assumptions on the programming of housing completions are a snap shot in time, are widely recognised as challenging to predict accurately, and can vary considerably from year to year. The start date and rate of development anticipated from any site can be influenced significantly by many factors outwith the control of the planning system, such as economic conditions, the aspirations of landowners, the demand for housing, the decisions of others on where and when to invest and make development happen, and the availability of mortgages, resources in general and the capacity in the construction sector. The rate and volume of house completions that can be achieved by housing providers during the plan period will likely be related more to these factors than any need to meet SDP1s HLRs.

6.14 Nonetheless, the current advice in PAN 2/2010 is to use the 'marketability' of a site as a measure of its 'effectiveness'. It is a variable factor that may be taken into account when determining if any site or part of a site can be developed within a five year period, and thus the contribution that site is able to make to the effective land supply. **The current use of 'marketability' as an effectiveness criterion influences how fast a site, or part of a site, can be programmed to be built and thus how many homes may be counted as 'effective' in the context of market conditions prevalent at the time programming assumptions take place.** Market constraints can result in low levels of completions or programmed completions, and a numerical shortfall of 'effective' housing land. This can conceal that a site (or the full capacity of a site) that is effective or that can become effective could be built faster were it not for wider factors related to 'marketability / market constraints' that could be preventing SDP1's HLRs from being met. When the cumulative impact of this is applied to the land supply overall, low levels of demand can significantly reduce the amount of 'land' that can be counted 'effective'. The 'marketability' criterion of PAN 2/2010 can result in a perceived shortfall of effective housing land, but not because there is a shortage of otherwise unconstrained land, rather because there is limited demand to build new homes.

6.15 In line with the Scottish Government's current national planning policy and advice, if there is not 'enough' effective housing land for the next five years, a presumption in favour of development that contributes to sustainable development will be a significant material consideration in the determination of proposals for housing development on land not identified by LDP1 as suitable in principle for that purpose. As such, even though a generous housing land supply would be made available by PLDP1 at the point of adoption, an inability to build homes on the land supply when the plan is operative at the rate expected to meet SDP1 requirements could lead to unreasonable calls to release additional sites for alternative housing proposals on

land not identified by LDP1 as suitable in principle for that purpose. This may result in the release of more housing land even though a reason for the shortfall of effective housing land occurring in the first instance is because 'market conditions / constraints' are prohibitive to a sufficient rate and volume of homes being built in time to meet the HLR of the plan in the first instance.

6.16 It is an aim of LDP1 to secure housing development in the right place, not to allow development at any cost. In the event of a programmed shortfall of dwelling completions from the effective housing land supply, there will be a cost associated with continually following a short term unplanned approach to delivering new homes. Developing housing on land not identified by LDP1 as suitable in principle for that purpose will dilute capacity and resources and distract them and the focus from securing the outcomes associated with delivering LDP1 strategy and sites. This could generate risk and uncertainty around associated funding and investment decisions, and undermine the ability and willingness to deliver LDP1 sites and further delay their development, and thus compound the plan's delivery issues. Such an approach could lead to a very serious and unjustified threat to the delivery of the plan's strategy and sites. It would also undermine the consultation undertaken in the preparation of LDP1 and the plan-led system. These are significant material considerations.

6.17 As the Chief Planner's letter of 29<sup>th</sup> October 2010 indicates, site programming may not be a reliable indicator of the total amount of effective land available if issues of 'marketability' are affected by the availability of mortgages or low level of demand. He advises there will be little if anything to be gained by releasing additional sites if the maintenance of a five year supply of effective land is constrained by these factors. A key consideration in this will be whether, in the absence of a marketing constraint, there would be 'enough' unconstrained housing land available for the next five years. The Scottish Government also published Draft Planning Delivery Advice: Housing and Infrastructure for consultation on the 17<sup>th</sup> February 2016. It seeks greater collaborative working to overcome barriers to delivery of sites allocated by Local Development Plan, and seeks to ensure that measuring and monitoring the amount and adequacy of the effective housing land supply should be more focused on what **could** be achieved in terms of the rate and volume of house building in an area. Importantly, the Draft Planning Delivery Advice at Table 1 (page 5) sets out a different approach to how the adequacy of the five-year effective land supply may be calculated in future than that currently set out in Advice Box 1 of the Proposed LDP. The emerging PAN calculation method does not take into account dwelling completions achieved since the based date of a plan, and this would seem to reflect that the actual take-up of allocated effective housing land or land that could be made effective could be a function of market demand. If this calculation method were to be used it could mean that a different method for how to monitor and calculate the adequacy of the five year effective housing land supply should be used than that currently set out in the Proposed LDP. However, a statement from the Scottish Government's has confirmed that PAN 2/2010 remains in place until the Draft Planning Delivery Advice is finalised<sup>4</sup>. The draft advice may nonetheless provide an insight into how the Scottish Government wants the 'effectiveness' of housing land to be assessed, and how the adequacy of the effective land supply may be monitored, in future.

6.18 However, there is a significant assessed need and demand for new homes in the area. In the event that a programmed shortfall of dwelling completions from the effective housing land supply arises, and if this reduced rate of delivery has not been caused by low levels of demand or market

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<sup>4</sup> <http://www.gov.scot/Topics/Built-Environment/planning/Roles/Scottish-Government/Guidance/Other-Publications/Housing-Infrastructure>

constraints, this will be given significant weight by the Council as it decides if there is enough ‘unconstrained’ housing land in the area, or if the principle of housing development on land not identified by LDP1 as suitable in principle for that purpose should be supported. This will be monitored by the Council through its HLA and Action Programme. If it is considered that the supply of effective housing land is not enough for the next five years, proposals will be assessed against all relevant policies of the development plan, including SDP Policy 7, Policy HOU2 below and any other relevant material considerations.

### **Policy HOU2: Maintaining an Adequate 5-Year Effective Housing Land Supply**

If an adequate five year effective housing land supply is not being maintained in East Lothian, the Council may accept the principle of housing development on land not identified by the LDP as suitable in principle for that purpose. Any such proposals must comply with SDP Policy 7, the criteria below, and all other relevant plan policies, including Policy NH1 and those on design:

1. Location - the site is an appropriate extension to an existing settlement defined by the LDP;
2. Effectiveness - it must be proven that the site would be immediately effective and capable of being substantially completed within five years;
3. Scale – the scale of the proposal must not predetermine or prejudice the Council’s subsequent flexibility to consider and determine where any housing land allocation should occur through a future review of this plan, and it must also be appropriate to the scale and character of the specific settlement and local area, and should be no more than 300 homes – the subdivision of a larger sites into smaller applications in order to meet this maximum will not be supported;
4. Timing – evidence will be expected of housebuilder interest in the site to demonstrate that it can reasonably be followed through and early dwelling completions can be anticipated;
5. Development plan strategy – the proposal must not prejudice the delivery of the development plan strategy by using infrastructure capacity needed for existing housing commitments or allocations, or compromise the ability to provide infrastructure capacity for them, and it must not be dependent on the prior provision of infrastructure to be provided by existing allocations where these have not yet started and delivered the necessary infrastructure;
6. Any additional infrastructure capacity required as a result of the development is either committed or will be funded by the developer and can be delivered.

### **General Points**

6.19 In preparing the PLDP1 the Council has taken a balanced view on how it can give housing providers the opportunity to maximise the contribution they can make to meeting East Lothian’s Housing Land Requirements by:

- Planning for a generosity allowance in the supply of housing land having regard to the margin of 10-20% generosity identified by SPP (2014);
- Allocating a range of sites for housing development, including in terms of size, location and type (greenfield / brownfield);

- Prioritising the compact strategy but also providing for some further dispersal to help meet need and demand and deliver homes in the volumes needed;
  - Identifying a range of sites over and above those identified as preferred by the MIR; and
  - Including within the LDP a policy that, if justified, would allow the Council to accept the principle of housing development on land not identified by the LDP as suitable in principle for that purpose in order to maintain an adequate supply of effective housing land.
- 6.20 The Council has also sustained its approach in respect of Development Management decisions on windfall housing sites by continuing to operate its Interim Planning Guidance: Housing Land Supply as it has done since December 2013.
- 6.21 At the meeting of East Lothian Council on the 17<sup>th</sup> November 2015, when the Draft PLDP1 (as amended) was approved, without prejudice the Council invited landowners and developer to engage in discussions with Council officers to bring forward the sites it wants to allocate.

**Housing Land Requirement & Housing Land Supply**

A1.1 Table HOU2 of the PLDP1 (which is repeated as Table 1 below) demonstrates that the PLDP1 conforms to SDP1. Table 1 demonstrates that, if adopted as proposed, the PLDP1 would allocate sufficient appropriate sites that can be developed so their cumulative output could meet SDP1s HLR up to 2019 and HLR for the period 2019 - 2024, while taking into account possible start dates and rates of development and the SPP (2014) generosity margin of 10 – 20% in the supply. This Appendix explains in detailed the information sources, methodology and key steps for the calculation that underpins Table 1.

STEP	SOURCE	METHOD	PLANNING PERIODS	2009 - 19	2019 - 24	TOTAL TO 2024	2024 -32 <sup>(5)</sup>	Beyond 2032	TOTAL
1	Table 3		SDP Housing Requirement to 2024	6,250	3,800	10,050	3,820	0	13,870
2	Table 4		Dwelling Completions 2009 – 15	2,038	0	2,038	0	0	2,038
3	Table 6		Contribution from Established Land Supply <sup>(1)</sup>	2,670	2,143	4,813	0	0	4,813
4	Table 14		Contribution from New Allocations	2,115	2,906	5,021	1,814	450	7,285
5	Table 8		Contribution from Future Windfall Sites <sup>(2)</sup>	84	105	189	110	0	299
6	Table 11		Loss of Supply to Dwelling Demolitions <sup>(3)</sup>	15	8	23	12	0	35
7		Step 7 = Steps 2+3+4+5-6	<b>Sub-Total Housing Land Supply</b>	<b>6,892</b>	<b>5,146</b>	<b>12,038</b>	<b>1,912</b>	<b>450</b>	<b>14,400</b>
8	Table 6		<b>Contribution from Blindwells</b>	<b>0</b>	<b>291</b>	<b>291</b>	<b>801</b>	<b>508</b>	<b>1,600</b>
9		Step 9 = Step 7 + Step 8	<b>Grand Total Housing Land Supply</b>	<b>6,892</b>	<b>5,437</b>	<b>12,329</b>	<b>2,713</b>	<b>958</b>	<b>16,000</b>
10		Step 10 = Step 1 - Step 9	<i>Shortfall / Surplus of Housing Land<sup>(4)</sup></i>	<i>-642</i>	<i>-1,637</i>	<i>-2,279</i>	<i>1,107</i>	<i>958</i>	<i>2,130</i>
11		Step11 = (Step9/Step1) x 100	<i>% generosity in land supply to 2024</i>	<i>10</i>	<i>43</i>	<i>23</i>			<i>15</i>

<sup>(1)</sup> Based on 2015 Housing Land Audit including contribution of 92 dwellings from small sites (less than 5 units) programmed 2015–19 and 23 units 2019/20 as per audit; <sup>(2)</sup> SESplan’s windfall assumption for East Lothian has been used; <sup>(3)</sup> Based on demolitions information from ELC Building Standards; <sup>(4)</sup> A negative number indicates a surplus of housing land against the housing requirements; <sup>(5)</sup> For the avoidance of doubt, the figure for the period 2024 – 32 is not part of SDP1s housing requirement, but is an estimate of need and demand for housing during that period from the SESplan HNDAs.

## Assessing How Much Housing Land is Needed for PLDP1

A1.2 Assessing how much housing land should be provided by PLDP1 requires a number of steps to be followed. Generally, the assessment takes into account the contribution that can be made from all known or anticipated sources of housing land towards meeting the SDP1 HLR for East Lothian over the LDP1 period. Once the contribution from all sources of housing land is identified, the housing land shortfall can be calculated as shown below:

<b>Housing Land Requirement</b>	
Minus	
<b>Established Housing Land Supply</b>	
	Dwelling Completions achieved 2009 – 2015
Plus	Established Housing Land (may include a contribution from constrained sites)
Plus	Allowance for Windfall Development
Minus	Dwelling Demolitions
<b>Equals</b>	
<b>Housing Land Shortfall</b>	

A1.3 However, in line with SDP1 examination findings the capacity of the LDP1 housing land supply should be greater than its HLR. As such, the Housing Land Shortfall does not indicate the total capacity of the additional land that should be allocated. It indicates the amount of additional land that should be capable of development to enable the delivery of homes to meet the HLR. This is because not all of the land may be built out in the necessary timescales, and some sites may also become non-effective or not become effective when LDP1 is operative. Additionally, in the absence of a national or regional policy position on how much generosity should be provided and not exceeded in the land supply of PLDP1, the Council has had regard to the SPP (2014) generosity margin of 10 – 20% when making additional land available as part of the PLDP1 housing land supply.

A1.4 In practice, LDP1 should ensure that it makes available an appropriate and sufficient amount of land with a full range and choice of site types and sizes in marketable locations that are effective or that can become effective to ensure housing providers can deliver enough homes to meet the HLR for East Lothian. As such, the amount of housing land proposed to be made available by the PLDP1 has also been informed by reasonable assumptions on the start dates and programming of house completions / rates of delivery from all sources of housing land. The assumptions should be ambitious and based on what could be achieved with the house building industry's will and ability to vigorously recover from recession by pro-actively pursuing planning permissions and other statutory consent so it can meet need and demand in the necessary timescales (SESplan Examination Report Issue 15 para 13, 19 and 25).

## Functional Housing Market Area and SESplan Need and Demand

A1.5 SESplan's first Housing Need and Demand Assessment (HNDA1) for SDP1 provided the evidence base for defining SDP1s HRs and HLRs for LDP1. HNDA1 was produced on the basis that the entire SESplan area is a single functional housing market area, albeit there may be smaller sub-market areas operating within it. An outcome of the examination of SDP1 was that the entire SESplan area could be considered as a single functional housing market area (Issue 15 para 31 – 33) and that sufficient land should be provided to meet the assessed levels of housing need and demand set out in Table 2 below. HNDA1 includes an assessment of housing need and demand at the local area level and for the city region as a whole.

	<b>Assessed Housing Requirement 2009 - 2019</b>	<b>Assessed Housing Requirement 2019 - 2024</b>	<b>Assessed Housing Requirement 2009 - 2024</b>	<b>Assessed Housing Requirement 2024 - 2032</b>
<i>Edinburgh</i>	34,290	14,200	48,490	22,505
<b>East Lothian</b>	<b>5,210</b>	<b>2,740</b>	<b>7,950</b>	<b>3,820</b>
<i>Fife</i>	16,260	7,400	23,660	10,363
<i>Midlothian</i>	1,700	500	2,200	171
<i>Scottish Borders</i>	5,955	2,780	8,735	3,802
<i>West Lothian</i>	11,420	5,090	16,510	7,338
<b>SESplan</b>	<b>74,835</b>	<b>32,710</b>	<b>107,545</b>	<b>47,999</b>

Source: SESplan Examination Report April 2013

A1.6 However, while the local area outputs should be seen as the housing need and demand that is estimated to be generated within them, these figures are not the Housing Requirements to be met within the individual local areas. Each local area is not a self contained housing market area, and housing need and demand does not need to be met within the local area where it is perceived to have originated. SPP (2010) was clear that housing allocations need not reflect past trends and environmental or infrastructure opportunities or constraints may provide reasons why HNDA1s assessed levels of need and demand should be redistributed within the wider functional housing market area.

A1.7 An outcome of the examination of SDP1 was that it would be necessary for SESplan to prepare Supplementary Guidance on Housing Land (SGHL) to set HLRs for each local area based on an analysis of how the HNDA1 assessed levels of housing need and demand for the whole SESplan area could be best met (Issue 15 para 18). In particular, the SGHL was to consider how much of the housing need and demand assessed as being generated by Edinburgh will require to be met in each of the other local areas (Issue 15 para 19). This was to be based on rates of development that could be expected from an anticipated economic recovery as well as the most suitable locations for further housing allocations based on an analysis of environmental and infrastructure opportunities and constraints (SESplan Examination Report Issue 15 para 13, 19 and 25).

## East Lothian's Housing Land Requirements

A1.8 Following SESplan's analysis of environmental and infrastructure opportunities and constraints, Scottish Minister's approved SESplan's SGHL in June 2014. It set out the redistribution of housing need and demand from Edinburgh to the other local authority areas and sets HLRs for each area. Table 3 below sets out East Lothian's Housing Land Requirements.

	Housing Land Requirement 2009 - 2019	Housing Land Requirement 2019 - 2024	Housing Land Requirement 2009 - 2024	Assessed Need & Demand 2024 - 2032
<b>East Lothian</b>	6,250	3,800	<b>10,050</b>	3,820

Source: SESplan Supplementary Guidance on Housing Land 2014

A1.9 The SGHL was based on Housing Land Audit (HLA) 2012. The SGHL sets out at Table 3.2 where 'additional allowances' should be brought forward by LDPs to meet the HLRs – i.e. the assessed 'Housing Land Shortfall' at 2012 against the HLR. Based on the HLA 2012, a shortfall of land for 3,560 homes was identified for East Lothian at that time. However, paragraph 3.9 of the SGHL also notes that the 'additional allowances' will need to be re-assessed in the preparation of LDPs to demonstrate that the HLRs set for each LDP area will be met by site allocations that can be developed to meet the HLR of the LDP.

A1.10 The reassessment of the housing land position is to be done on the basis of the up-to-date HLA, taking into account any further additions to the supply that can be safely anticipated from further potential 'windfall' sites or 'constrained' sites that may contribute as well as any dwelling 'demolitions' that may occur during the plan period.

## East Lothian's Established Housing Land Supply

A1.11 The housing land supply for LDP1 consists of a number of sources of housing land. A main source is the Established Housing Land Supply. It is the total available housing land supply, including unconstrained and constrained sites. It comprises effective housing land, and includes the remaining capacity of sites under construction, sites with planning consent, sites in the adopted local plan and if appropriate other buildings and land with agreed potential for residential development.

A1.12 For the purposes of the PLDP1, the dwelling completions that have achieved since the base date of SDP1 (2009/10), plus an allowance for further windfall housing development and dwelling demolitions during the plan period have also been taken into account to identify the total amount of land available for the construction of homes during the plan period.

### **Completions Achieved between 2009/10 – 2014/15**

A1.13 Dwelling completions achieved since the 2009/10 base date of SDP1 will contribute to meeting SDP1s HLRs. These dwelling completions are added to the Established Housing Land supply to provide the total amount of land available during the plan period that can contribute to meeting SDP1s HLRs. The number of completions recorded through the HLA process since the 2009/10 is as set out in Table 4 below:

<b>Table 4: Dwelling Completions Achieved in East Lothian 2009 – 2015</b>								
	<b>2009/10</b>	<b>2010/11</b>	<b>2011/12</b>	<b>2012/13</b>	<b>2013/14</b>	<b>2014/15</b>	<b>Total 2009 – 15</b>	<b>Annual Average</b>
<b>All Completions</b>	<b>193</b>	<b>481</b>	<b>433</b>	<b>214</b>	<b>383</b>	<b>334</b>	<b>2,038</b>	<b>340</b>
<i>Affordable completions</i>	81	256	240	33	138	76	824	137
<i>Market completions</i>	112	225	193	181	245	258	1214	202
<i>Proportion Windfall Completions</i>	92	181	149	46	128	55	651	109

Source: East Lothian Housing Land Audits 2009/10 – 2014/15

A1.14 Overall, 2,038 dwellings have been completed since the 2009/10 base date of SDP1, which equates to an annual average of 340 homes over this period. The highest number of completions achieved during this period was in 2010/11 and 2011/12 which is also when the highest number of affordable homes were built, which reflects an accelerated funding programme for that purpose during that time, including Scottish Government funding. Affordable completions average around 140 per annum over the period. Whilst market housing completions have generally increased on an annual basis since 2009/10, the annual average is only around 200 per annum. The average windfall completion rate has been around 110 per annum.

A1.15 The highest number of annual completions ever recorded in East Lothian was in 2006/07 when 872 homes were built. The second highest number of completions was achieved the previous year when 768 homes were built. However, these figures stand out as exceptions to the annual average rate of completions that has been delivered in the 14 years between 2001/02 and 2014/15, which is 455 dwellings per annum. In the first seven years since 2001/02 the annual average was around 550 dwellings per year, whereas since 2008/09 the annual average has reduced to around 340 units per annum.

### **East Lothian's Five Year Effective Housing Land Supply at 2015**

A1.16 The East Lothian Housing Land Audit (HLA) is prepared annually. Generally, it identifies all housing sites that contain five or more dwellings and sets out start dates and programming for their development for the next five years; it also provides an indication of same for years six and seven. The HLA identifies sites that are allocated by the local plan (whether they have planning permission or not) as well as windfall sites that have obtained planning permission. It sets out start dates (if development has not commenced) and the rates of annual completions anticipated from all audited sites.

A1.17 In the preparation of the HLA, ELC officers approach landowners and developers concerning their intended start dates and programming for the development of their sites, including for those that do not have planning permission or have not started: these assumptions can vary from year to year, sometimes considerably –e.g. start dates can come forward or be delayed and the rate and volume of development and increase or reduce. However, the very small number of comments back from Homes for Scotland members seeking changes to a draft audit in relation to their sites is normally the outcome of this process. ELC officers approach site owners / developers (including ELC as affordable housing provider) of smaller audited sites that are not controlled by Homes for Scotland members and normally reflect their aspirations in the preparation of the HLA. As advised by Scottish Government Planning Advice Note PAN 2/2010: Affordable Housing and Housing Land Audits, the HLA monitors the number of homes that are programmed to be built: it does not monitor the amount of land that is available for house building and that could be counted effective if there were a will and ability to develop homes faster.

A1.18 In many cases the practice of ELC since 2007/8 has been to take a cautious view of delivery on smaller audited sites, with many programmed outwith the five year period or categorised as constrained. Additionally, if a site has planning permission and programming parameters form part of that consent – e.g. to restrict annual completions from a site to ensure sufficient education capacity is or will be available for the development – the HLA reflects the approved programming. This is because the site can be developed at the rate associated with the planning permission. Put another way, there is no planning constraint to developing the land at the rate the proposal was assessed at and for which developer contributions are agreed. The land is effective to that extent because it can be developed at the rate on which the planning permission is based and allows for, even if the site may not be built as quickly.

A1.19 The HLA includes an allowance for small sites of less than five units. Whilst small sites are not audited on a site specific basis the overall number of homes with planning permission on small sites with less than five units is recorded. Completions on small sites of less than five units are recorded by way of Building Control completions data. Each year the total number of planning permissions and total number of completions certificates issued for sites of less than five units are subtracted from one another. This reveals the number of dwellings with planning permission on small sites that remain to be built. Of that total, an allowance of 75% dwelling completions from small sites with less than five units with planning permission is programmed pro-rata over the next five year period to contribute to the effective housing land supply – i.e. it is assumed that 25% of homes on small sites will not be built.

A1.20 Where a site passes the effectiveness criteria of PAN 2/2010, the number of homes programmed to be built on that site in the next five years are included on the five-year effective housing land supply. Based on the 2014/15 HLA, Table 5 below sets out the amount of effective housing land (i.e. the number of new homes programmed to be built) within East Lothian in the five years between 2015/16 – 2019/20.

<b>Table 5: East Lothian's Five Year Effective Housing Land Supply at 2015</b>										
		15/16	16/17	17/18	18/19	19/20	Total Completions	20/21	21/22	Post 21/22
<b>Total Effective Supply</b>	<b>6,413</b>	<b>398</b>	<b>723</b>	<b>862</b>	<b>687</b>	<b>637</b>	<b>3,307</b>	<b>820</b>	<b>459</b>	<b>1,827</b>
<i>Audited Sites</i>	6,298	375	700	839	664	614	3,192	820	459	1,827
<i>Small Sites</i>	115	23	23	23	23	23	115	0	0	0

Source: East Lothian Housing Land Audit 2014/15

### Programming for East Lothian's Housing Land Supply 2015 – 2024 and beyond

A1.21 Based on the 2014/15 HLA, and the continuation of the current programming for sites in the effective housing land supply to completion, Table 6 below shows the timescales currently anticipated for dwelling completions from the remaining capacity of the housing land supply set out in the 2015 HLA. This longer term programming of dwelling completions has been carried out to identify the number of homes that are currently programmed to be built within the LDP1 period up to 2019 and for the period 2019 – 2024.

		15/16	16/17	17/18	18/19	Completions 15/16–18/19	19/20	20/21	21/22	22/23	23/24	Completions 19/20-23/24	Completions 15/16-23/24	Post 23/24
<b>Total Effective Supply</b>	<b>6,413</b>	<b>398</b>	<b>723</b>	<b>862</b>	<b>687</b>	<b>2,670</b>	<b>637</b>	<b>820</b>	<b>459</b>	<b>346</b>	<b>172</b>	<b>2,434</b>	<b>5,104</b>	<b>1,309</b>
<b>Blindwells*</b>	<b>1,600</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>24</b>	<b>73</b>	<b>97</b>	<b>97</b>	<b>291</b>	<b>291</b>	<b>1,309</b>
<b>Other Audited Sites</b>	<b>4,698</b>	<b>375</b>	<b>700</b>	<b>839</b>	<b>664</b>	<b>2,578</b>	<b>614</b>	<b>796</b>	<b>386</b>	<b>249</b>	<b>75</b>	<b>2,120</b>	<b>4,698</b>	<b>0</b>
<b>Small Sites</b>	<b>115</b>	<b>23</b>	<b>23</b>	<b>23</b>	<b>23</b>	<b>92</b>	<b>23</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>23</b>	<b>115</b>	<b>0</b>

Source: Based on East Lothian Housing Land Audit 2014/15

		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	Completions 24/25 – 31/32	Post 31/32
<b>Blindwells</b>	<b>1,309</b>	<b>97</b>	<b>122</b>	<b>801</b>	<b>508</b>						

Source: Based on East Lothian Housing Land Audit 2014/15

### Contribution from Windfall Sites

A1.22 Unplanned housing development often comes forward from 'windfall' sites. Such unanticipated housing development can occur on land not specifically allocated for housing by the LDP but for which there may be policy support in principle for residential development – e.g. the redevelopment of urban buildings or land. To assist in forecasting a likely trend for the additional contribution of dwellings from windfall sites, SESplan completed an Urban Capacity Study (UCS) in 2009. Of all the windfall development anticipated in the SESplan area by the study, East Lothian accounts for 1% of the SESplan total. This reflects that the UCS was based on an analysis of potential windfall sites that could be identified at that time, whereas many of East Lothian's windfall opportunities emerge from farm steading conversions or similar that are more difficult to identify or predict (and therefore were not identified by the UCS) but do emerge through time. The average scale of windfall development actually achieved in East Lothian since 2009/10 is set out in Table 4.

A1.23 Importantly, not all sites identified in the UCS were expected to come forward, but it was assumed that alternative sites may replace those that do not. To account for this, and to ensure the derived trend was reasonable and realistic, the amount of land identified was discounted to arrive at a safe level of output from windfall sites, based on the analysis of opportunities at the time. In terms of meeting the HLR, it was assumed that the level of development identified in the UCS would apply for the first 7 years of SDP1, that 75% of this would apply up to 2024 and that 50% of it would apply for the longer term. Table 7 below sets out the annual output anticipated from windfall sites in East Lothian by the UCS during these periods.

<b>Table 7: SESplan Windfall Assumptions (Based on SESplan Urban Capacity Study 2009)</b>						
	<b>Annual Contribution</b>			<b>Total Contribution</b>		
	2010 - 2015	2015 - 2024	2024 - 2032	2010 - 2019	2019 - 2024	2024 - 2032
<b>East Lothian</b>	28	21	14	220	110	110

Source: SESplan Urban Capacity Study 2009 / Figures for Total Contribution Rounded to nearest 10 units

A1.24 However, for the purposes of the PLDP1, these windfall assumptions need to be revised to take into account the passage of time since they were originally derived. In particular, the assumptions for the time period up to 2015 are no longer relevant, and the figures for the period up to 2019 need to be recalculated. Table 8 is based on the UCS, but sets out how the revised windfall contribution has been recalculated for PLDP1.

<b>Table 8: Revised SESplan Windfall Assumptions (Based on SESplan Urban Capacity Study 2009)</b>			
	<b>2015 - 2019</b>	<b>2019 - 2024</b>	<b>2024-32</b>
<b>Recalculation Method</b>	21 units per annum x 4 years	21 units per annum x 5 years	14 units per annum x 8 years
<b>East Lothian Windfall Assumption</b>	84	105	110

Source: based on SESplan Urban Capacity Study 2009 / Figures for Total Contribution Rounded to nearest 10 units

A1.25 The SESplan Examination Report at Issue 16 (para 6 – 12) is clear that it is appropriate and acceptable to include an assumption that windfall sites will be one of the sources of additional housing land that can contribute towards meeting the HLRs, provided these assumptions are reasonable and safe – e.g. avoid the prospect of ‘double counting’.

A1.26 Table 4 above indicates that in the recent past an annual average of around 100 units has been achieved on windfall sites – i.e around four times more than the allowance for the PLDP1. However, some windfall sites are already audited by the 2015 HLA, and therefore feature in the effective housing land supply set out in Table 5 and 6 for the period up to 2020. Notwithstanding this, the PLDP1 windfall allowance is safe as a further contribution of an additional 21 homes per year from new windfall sites in addition to audited windfall sites already known of is reasonable.

### **East Lothian's Constrained Housing Land Supply**

A1.27 Based on the 2014/15 HLA, Table 9 sets out the constrained housing land programmed to be developed from 2014/15. All constrained housing sites are programmed outwith the five-year effective housing land supply period, but are programmed to be developed in 2020/21.

<b>Table 9: East Lothian's Constrained Housing Land Supply</b>									
	15/16	16/17	17/18	18/19	19/20	Total	20/21	21/22	Post 2021/22
<b>No. of Completions</b>	0	0	0	0	0	0	40	0	0

Source: East Lothian Housing Land Audit 2014/15

A1.28 This is because it has been the practice of ELC since 2007/08 to take a cautious view of delivery on smaller audited sites, and this is reflected in the programming assumptions of the 2015 HLA as many are programmed outwith the 5 year effective land supply period. Consultation with Homes for Scotland suggests that the housing market is not able to support farm steading conversions / the development of smaller sites, particularly where those sites are not in control of a Homes for Scotland member company, but as market demand returns such sites may be developed more quickly again. In some cases this means that assumptions have been made that renewal of planning permission will be applied for and that these renewals will be approved, as is often the case and reasonable to assume. However, in a small number of cases planning permission for small audited sites may have lapsed during the preparation of the 2015 HLA and, to help secure some agreement with Homes for Scotland for the purposes of the 2015 HLA, those sites were taken to be constrained.

A1.29 For the purposes of PLDP1, completions from constrained sites are currently excluded from the effective housing land supply, but they could be included in the Established Housing Land supply. This is because whilst this land is not currently programmed to be developed in the next five year period, it may be that some or all constrained sites could be developed after 2019/20; it may also be that they could be developed sooner or programmed earlier in subsequent HLAs if planning permission for those sites is re-applied for and approved, thereby adding to the effective supply through time. Even though these sites are in the constrained category, they do have agreed residential development potential and can appear in the Established Housing Land supply.

A1.30 However, for the purposes of PLDP1, constrained sites have been excluded from the housing land supply calculation. This is because there are so few of them and because their cumulative capacity is limited. They will provide some additional flexibility in the land supply when they do come forward.

## Demolitions

A1.31 Dwelling demolitions are recorded through the Building Control process, where a Building Warrant for demolition is required. In the five years between 2010 and 2015 a total of 7 dwellings were recorded as demolished within East Lothian. This translates into an annual average of 1.4 demolitions per year, as shown in Table 10 below.

	10/11	11/12	12/13	13/14	14/15	Total	Annual Average
<b>No. of Completions</b>	1	2	1	2	1	7	1.5

Source: East Lothian Council Building Control Data 2010/11 – 2014/15; Annual average rounded to nearest 0.5 unit

A1.32 For the purposes of the PLDP1, a demolitions assumption has been applied to each period of LDP1 and this is set out in Table 11 below.

	2009 - 2019	2019 - 2024	2024-32
<b>Calculation Method</b>	1.5 units per annum x 10 years	1.5 units per annum x 5 years	1.5 units per annum x 8 years
<b>East Lothian Windfall Assumption</b>	15	8	12

Source: Based on East Lothian Council Building Control Data 2010/11 – 2014/15 / Annual average rounded to nearest 0.5 units and assumption for plan period rounded to nearest whole unit

## Total Established Housing Land Supply

A1.33 To calculate the total Established Housing Land Supply for each of the plan periods the calculation set out in Table 12 has been used. It sets out the various steps to the calculation, the sources of information used and the methodology followed.

	2009 - 2019	2019 - 2024	2009 - 2024	2024 - 2032	Beyond 2032	Total	Step	Method	Source
Completions 2009/10 -14/15	2,038	0	2,038	0	0	2,038	1		Table 4
Established Housing Land	2,670	2,434	5,104	801	508	6,413	2		Table 6
Windfall Allowance	84	105	189	110	0	299	3		Table 8
Demolitions Allowance	15	8	23	12	0	35	4		Table 11
<b>PLDP Established Housing Land Supply</b>	<b>4,777</b>	<b>2,531</b>	<b>7,308</b>	<b>899</b>	<b>508</b>	<b>8,715</b>		1 + 2 + 3 - 4	

## East Lothian's Housing Land Shortfall by Plan Period

A1.34 The Housing Land Shortfall is calculated by subtracting the Established Housing Land supply from the HLR, as shown in Table 13.

	<b>2009 - 2019</b>	<b>2019 - 2024</b>	<b>Total</b>	<b>2024 - 2032</b>	<b>Beyond 2032</b>	<b>Total</b>
Housing Land Requirement	6,250	3,800	10,050	3,820	0	13,870
Established Housing Land Supply	4,777	2,531	7,308	899	508	8,715
<b>Housing Land Shortfall</b>	<b>1,473</b>	<b>1,269</b>	<b>2,742</b>	<b>2,921</b>	<b>-508</b>	<b>5,155</b>

A1.35 However, as discussed above, and in line with SDP1 examination findings and SPP (2010), the capacity of the housing land supply should be greater than the HLRs. Accordingly, the Housing Land Shortfall does not indicate the amount of additional land that needs to be allocated. It indicates the number of homes that should be capable of development on the housing land supply to enable the HLR to be met.

A1.36 In practice, LDP1 should ensure that it makes available an appropriate and sufficient amount of land with a full range and choice of site types and sizes in marketable locations that are effective or that can become effective to ensure housing providers can deliver enough homes to meet the HLR for East Lothian. However, not all housing land will be built out within the anticipated time-scales. Some sites may become non-effective or not become effective during the plan periods. For this reason additional generosity should be added to the land supply. Reasons for doing this are to help ensure enough effective housing land is available at all times and to minimise the potential need to consider approving planning permission for housing development on land not identified as suitable in principle for that purpose by LDP1 when it is operative.

A1.37 As such, the amount of housing land proposed to be made available by PLDP1 has been informed by reasonable assumptions on possible start dates and programming of house completions / rates of delivery from all sites. These assumptions are and should be ambitious, and based on what could be achieved with the house building industry's will and ability to vigorously recover from recession by pro-actively pursuing planning permissions and other statutory consents so they can meet need and demand within the necessary timescales (SESplan Examination Report Issue 15 para 13, 19 and 25). Additionally, in the absence of a national or regional policy position on how much generosity should be provided in the land supply by PLDP1, it has had regard to the SPP (2014) margin of generosity of 10 – 20% alongside these programming considerations.

## Programming of New Allocations

A1.38 A key issue for LDP1 is to make available an appropriate and sufficient amount of housing land with a full range and choice of site types and sizes in marketable locations that are effective or that can become effective so housing providers can build enough homes on time to meet the SDP1 HLRs.

A1.39 As such, in the same way as the Established Housing Land Supply has been programmed to completion, to determine the total amount of land available within the plan periods the same approach has been taken in relation to the new land allocations of the PLDP1, as set out in Table 14.

		15/16	16/17	17/18	18/19	Completions 15/16–18/19		19/20	20/21	21/22	22/23	23/24	Completions 19/20-23/24	Completions 15/16-23/24	Post 23/24
<b>New Allocations</b>	<b>7,405</b>	<b>0</b>	<b>0</b>	<b>790</b>	<b>1,325</b>	<b>2,115</b>		<b>990</b>	<b>530</b>	<b>445</b>	<b>435</b>	<b>506</b>	<b>2,906</b>	<b>5,021</b>	<b>2,264</b>
		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	Completions 24/25 – 31/32		Post 31/32			
<b>New Allocations</b>	<b>2,264</b>	<b>446</b>	<b>308</b>	<b>225</b>	<b>225</b>	<b>225</b>	<b>225</b>	<b>85</b>	<b>75</b>	<b>1,814</b>		<b>450</b>			

A1.40 New sites proposed for allocation are not anticipated to commence until audit year 2017/18, unless planning permission for their development has already been approved – e.g. under the Interim Planning Guidance: Housing Land Supply, which the Council has been operating since December 2013. This is to allow time for PLDP1 to proceed through examination and to be adopted by the Council. In the interest of meeting SDP1 HR and HLRs, it is anticipated that housing providers, on finalisation of a PLDP1 by the Council for representation, will seek to fully engage with council officers (if they have not done so already on the basis of the approved Draft PLDP1 (as amended) on the 17<sup>th</sup> November 2015) and submit planning applications for sites included in PLDP1.

A1.41 In principle this would allow for the outcome of any examination to be reported, and for the Council to approve planning permissions for PLDP1 sites mid - autumn 2017. This provides a minimum of 6 - 9 months to commence development and achieve 25 completions in the first year of construction on any site in 2017/18; if appropriate, some PLDP sites may be approved earlier (under the Council's Interim Planning Guidance: Housing Land Supply) and could start earlier. Nonetheless, for PLDP purposes the full capacity of sites provided to meet the 'interim' requirement up to 2019 are not programmed to be fully developed by 2018/19. This means the combined output from sites programmed to meet both the requirement up to 2019 and 2019-2024 provides more than 20% generosity above the HLR and overall more capacity in the land supply. Rates of programming reflect that higher levels of completions may be achieved once a site has started and / or because more than one house builder could develop a site, particularly larger ones. Where new allocations are intended to follow the development of existing ones, or are to be a later phase of a new allocation, completions are programmed sequentially rather than in parallel. It may be that the land could be developed faster, meaning more homes could be built earlier, if market demand and other factors allow for this.

## Total Combined Land Supply Programming

A1.42 The development of the Established Housing Land supply and new housing land allocations of PLDP1 will meet the HLRs set by SDP1. To indicate how this could be achieved Table 15 below combines the programming figures set out in Table 6: East Lothian’s Effective Housing Land Supply Programmed to Completion by Plan Period, with that set out in Table 14: East Lothian’s New Housing Land Allocations Programmed to Completion by Plan Period.

Table 15: East Lothian’s Total Combined Housing Land Supply Programmed to Completion by Plan Period														
		15/16	16/17	17/18	18/19	Completions 15/16–18/19	19/20	20/21	21/22	22/23	23/24	Completions 19/20-23/24	Completions 15/16-23/24	Post 23/24
<b>Total Supply</b>	<b>13,818</b>	<b>398</b>	<b>723</b>	<b>1,652</b>	<b>2,012</b>	<b>4,785</b>	<b>1,627</b>	<b>1,350</b>	<b>904</b>	<b>781</b>	<b>678</b>	<b>5,340</b>	<b>10,125</b>	<b>3,573</b>
Source: Tables 6 and 14														
		24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	Completions 24/25 – 31/32	Post 31/32			
<b>New Allocations</b>	<b>3,573</b>	<b>543</b>	<b>405</b>	<b>322</b>	<b>322</b>	<b>322</b>	<b>322</b>	<b>182</b>	<b>197</b>	<b>2,615</b>	<b>958</b>			
Source: Tables 6 and 14														

A1.43 The full schedule of anticipated dwelling completions supporting Tables 6, 14 and 15 is set out at Appendix 2. A summary sheet indicates the number of dwellings programmed to be developed based on the 2015 HLA (committed sites) and how similar assumptions have been applied to the sites proposed to be allocated by PLDP1. This summary sheet is based on (and sums) the separate tables set out subsequently for each cluster area in East Lothian. These separate sheets set out on a site by site basis the overall capacity, start date and programming, and where relevant the remaining capacity of all ‘committed’ and ‘proposed LDP’ sites. The separate cluster spreadsheets of Appendix 2 are linked to Table 1. It details how the different sources of housing land combine to meet the HLRs of SDP1 by plan period, taking into account a safe assumption for windfall development and an allowance for dwelling demolitions. A five year effective supply of housing land at the point of LDP1 adoption is also demonstrated.

A1.44 These assumptions are based on what could be achieved with the house building industry’s will and ability to vigorously recover from recession by pro-actively pursuing planning permissions and other statutory consent so they can meet need and demand within the necessary timescales (SESplan Examination Report Issue 15 para 13, 19 and 25). It may also be possible that higher rates of completions than those anticipated in 2014/15 could be achieved if economic and market conditions improve in the future.

## Housing Land Requirement & Housing Land Supply

A1.45 For East Lothian, SDP1 and its SGHL set HLRs of 6,250 homes up to 2019 and 3,800 homes 2019 – 2024, and overall for 10,050 homes in the period 2009 – 2024; the SESplan HNDA also indicates that there may be need and demand for a further 3,820 homes in the period 2024 – 2032. Table 1 below repeats and explains Table HOU2 of PLDP1. It demonstrates that, if adopted in the format proposed, PLDP1 will allocate sufficient appropriate sites that can be developed so their cumulative output could meet the SDP1 HLR up to 2019 and its HLR for the period 2019 - 2024, whilst having regard to the SPP (2014) margin of generosity of 10 – 20% in the supply. It should be noted that 23% generosity in the supply exists because the continued development of the remaining capacity of sites provided to secure 10% generosity in the first plan period up to 2019 leads to higher generosity in the plan period 2019 - 24.

STEP	SOURCE	METHOD	PLANNING PERIODS	2009 - 19	2019 - 24	TOTAL TO 2024	2024 -32 <sup>(5)</sup>	Beyond 2032	TOTAL
1	Table 3		SDP Housing Requirement to 2024	6,250	3,800	10,050	3,820	0	13,870
2	Table 4		Dwelling Completions 2009 – 15	2,038	0	2,038	0	0	2,038
3	Table 6		Contribution from Established Land Supply <sup>(1)</sup>	2,670	2,143	4,813	0	0	4,813
4	Table 14		Contribution from New Allocations	2,115	2,906	5,021	1,814	450	7,285
5	Table 8		Contribution from Future Windfall Sites <sup>(2)</sup>	84	105	189	110	0	299
6	Table 11		Loss of Supply to Dwelling Demolitions <sup>(3)</sup>	15	8	23	12	0	35
7		Step 7 = Steps 2+3+4+5-6	<b>Sub-Total Housing Land Supply</b>	<b>6,892</b>	<b>5,146</b>	<b>12,038</b>	<b>1,912</b>	<b>450</b>	<b>14,400</b>
8	Table 6		<b>Contribution from Blindwells</b>	<b>0</b>	<b>291</b>	<b>291</b>	<b>801</b>	<b>508</b>	<b>1,600</b>
9		Step 9 = Step 7 + Step 8	<b>Grand Total Housing Land Supply</b>	<b>6,892</b>	<b>5,437</b>	<b>12,329</b>	<b>2,713</b>	<b>958</b>	<b>16,000</b>
10		Step 10 = Step 1 - Step 9	<i>Shortfall / Surplus of Housing Land</i> <sup>(4)</sup>	<i>-642</i>	<i>-1,637</i>	<i>-2,279</i>	<i>1,107</i>	<i>958</i>	<i>2,130</i>
11		Step11 = (Step9/Step1) x 100	<i>% generosity in land supply to 2024</i>	<i>10</i>	<i>43</i>	<i>23</i>			<i>15</i>

<sup>(1)</sup> Based on 2015 Housing Land Audit including contribution of 92 dwellings from small sites (less than 5 units) programmed 2015–19 and 23 units 2019/20 as per audit; <sup>(2)</sup> SESplan's windfall assumption for East Lothian has been used; <sup>(3)</sup> Based on demolitions information from ELC Building Standards; <sup>(4)</sup> A negative number indicates a surplus of housing land against the housing requirements; <sup>(5)</sup> For the avoidance of doubt, the figure for the period 2024 – 32 is not part of SDP1s housing requirement, but is an estimate of need and demand for housing during that period from the SESplan HNDA.

A1.46 Accordingly, Table HOU2 of PLDP1 demonstrates how:

- the SDP1 and SGHL HLRs for East Lothian can be met using a combination of existing and new sites for each plan period, as is required by SDP1 and its SGHL as well as SPP (2010) under which SDP1 was prepared and approved by Scottish Ministers;
- account has been taken of anticipated completions from existing as well as proposed sites, and that not all the capacity of existing allocations and proposed sites may be realised in the SDP1 plan periods;
- reasonable assumptions have been made concerning the additional contribution that can be anticipated from windfall sites as well as in respect of dwelling demolitions (losses from the supply) during the plan periods;
- constrained sites have not currently been included within the overall supply calculation in view of the limited number of dwellings that could emerge from that source of housing land;
- because of the sites selected and their overall capacity, and based on the rate of development anticipated for them, 'generosity' exists in the housing land supply;
- with the reasonable rates of programming set out, 10% and 43% generosity in the supply would be available in periods up to 2019 and 2019 – 2024 respectively, and 23% overall up to 2024;
  - without the current Blindwells 1,600 house allocation, which is programmed to contribute in the period 2019 – 2024 only, there would still be levels of generosity of 10% up to 2019, and 35% in the period 2019 – 2024 and 20% generosity in the supply overall up to 2024;
- the land supply could be developed faster than currently anticipated if economic and market conditions and other factors allow for this as the sites have more capacity overall than the HLR and provide generosity based on their current programming – i.e. they could be developed faster to provide even more effective land if higher rates and volumes of completions than those anticipated are possible in future. Some PLDP sites may also be approved earlier (under the Council's Interim Planning Guidance: Housing Land Supply) and could start quicker;
- sufficient land is available into the longer term to contribute to meeting HNDA1 assessed need and demand for that period.

A1.47 As such, PLDP1 would make available an appropriate and sufficient amount of housing land, with sufficient flexibility and generosity provided in the supply, using a full range and choice of site types and sizes in marketable locations that are effective or that can become effective so housing providers can deliver enough homes to meet the HLRs of SDP1 within East Lothian. Importantly, Table HOU2 does not imply that further 'generosity' should be added to SDP1s confirmed HLR – i.e. it is clear that 'generosity' is implicit to the supply.

A1.48 Additionally, if programming considerations were to be set aside, Table HOU2 of PLDP1 shows that the overall capacity of all existing and proposed housing sites together (16,000 homes) exceed the HLR for East Lothian to 2024 by 59% including the existing Blindwells 1,600 home allocation (or by around 43% excluding the existing Blindwells allocation). The land supply of PLDP1 would provide 15% generosity above 13,870 homes (i.e. the sum of the 10,050 home HLR 2009 - 2024 and the 3,820 home estimated need and demand for the period 2024 – 32 from HNDA1). This may be increased further in future should Blindwells be capable of expansion beyond the current allocated site.

## Five Year Effective Land Supply

A1.49 SPP (2014) expects planning authorities to ensure there is always 'enough' effective housing land for at least five years. However, there continues to be no nationally prescribed method for how any calculation to measure the adequacy of the five year effective housing land supply should be carried out. The calculation method set out in Advice Box 1 of the PLDP1 reflects an interpretation of current Scottish Government planning advice set out in PAN 2/2010 on how to assess whether the amount of effective land is 'enough' for the next five years – i.e. if the number of homes that are programmed to be built on sites in the next five years will be sufficient to meet the recalculated housing land requirement. As set out in Table 16a-c below this method has been applied to demonstrate that, if adopted in the format proposed, PLDP1 provides enough effective housing land for the next five years.

Step			Information Source	Steps
1	East Lothian Housing Land Requirement to 2024	10,050	SESplan SGHL	N/A
2	HLA 2009-2019	6,250	SESplan SGHL	N/A
3	HLA 2019 - 2024	3,800	SESplan SGHL	N/A
4	HoNDA Signpost 2024 - 2032	3,820	SESplan HNDA Need & Demand	N/A
	HLA to 2024 & Need & Demand '2024-32	13,870		

Step			Information Source	Steps
5	Completions 2009/10-2014/15	2,038	HLA Completion Schedules 2009/10 – 14/15	N/A
6	LDP Supply 2014/15 – 2018/19	6,892	Table 1	N/A
7	LDP Supply 2019/20 – 2023/24	5,437	Table 1	N/A
8	LDP Supply 2024/25 – 2031/32	2,713	Table 1	N/A
9	Remaining requirement 2015/16-2018/19	4,212		Step 2 – Step 5 = Step 6
10	Remaining requirement 2019/20-2023/24	3,800	SESplan SGHL	N/A
11	Shortfall / Surplus 2009/10 – 2018/19	- 642		Step 2 – Step 6 = Step 11
12	Shortfall / Surplus 2019/20 – 2023/24	-1,637		Step 3 – Step 7 = Step 12
13	Shortfall / Surplus 2024/25 – 2031/32	1,107		Step 4 – Step 8 = Step 13

*A negative number indicates a surplus of housing land against the SDP1 housing requirements or SDP1 HNDA1 need and demand.*

Table 16c: Maintaining an Effective Five Year Housing Land Supply				
Step			Information Source	Steps
14	Housing Land Requirement 2009 - 2024	10,050		N/A
15	Remaining Housing Land Requirement to 2019	4,212	Step 9	N/A
16	Remaining Requirement to 2024	8,012		Step 1 – Step 5 = Step 16
17	Annual Requirement to 2019	1,053		Step 9 / 4 (years) = Step 17
18	Annual Requirement 2019 to 2024	760		Step 10 / 5 (years) = Step 18
19	Remaining Requirement to 2019	4,212	Step 9	N/A
20	Five Year Effective Land Supply Target	4,972		Step 9 + Step 18 = Step 20
21	Effective Land Supply to 2019	4,785	Table 15: 15/16 – 18/19	N/A
22	Five Year Effective Land Supply	6,412	Table 15: 15/16 – 19/20	N/A
23	Shortfall / Surplus in Effective Supply to 2019*	-573		Step 19 – Step 21 = Step 23
24	Shortfall / Surplus in Effective Five Year Supply*	-1,440		Step 20 – Step 22 = Step 24
25	Number of Years Supply	6.45		Step 22 / Step 20 x 5 (years) = Step 25

*\*A negative number indicates a surplus of housing land against the housing requirements.  
Note: Table 16c does not include assumptions on windfall housing completions or dwelling demolitions over this period.*

A1.50 Table 16a-c demonstrates that, if adopted in the format proposed, PLDP1 would provide enough effective housing land to ensure:

- a. the HLR up to 2019 can be met, with a surplus of effective land for 573 homes provided;
- b. the re-calculated five year effective housing land supply target can be met, with a surplus of effective land for 1,440 homes; and
- c. overall, that a 6.45 year supply of effective housing land would be available for the construction of homes.





**PRESTONPANS**

**Future Housing Completions - Committed Sites plus Proposed LDP Sites**

Site Ref	Latest Planning Ref	Site Name / Address	Total Dwellings	Complete by 03/15	Remaining as at 04/15					Totals	Remaining Post 18/19					Totals	Remaining Post 23/24							Totals	Remaining Post 31/32						Totals				
						15-19	19-20	20-21	21/22	22/23	23/24	19-24	24-25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	24-32	32/33	33/34	34/35	35/36	36/37	37/38	33/38							
<b>COMMITTED SITES - HOUSING LAND AUDIT 2013 SITES WITH UPDATED PROGRAMMING</b>																																			
E161a	04/01449/REM 06/01180/FUL	Edinburgh Road Prestonpans 'Silver Meadow'	270	239	31	31	0	0	0	0	31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E308	12/00509/P	West Seaside, Prestonpans	9	0	9	0	0	0	0	0	0	9	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E469	11/00692/P	Cockenzie House	20	0	20	0	20	0	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E451	11/00248/P	Seton East Steading Longniddry	9	0	9	0	0	0	0	0	0	9	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Committed Sites Totals</b>			<b>308</b>	<b>239</b>	<b>69</b>	<b>31</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>51</b>	<b>18</b>	<b>0</b>	<b>18</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	
<b>PROPOSED LDP SITES</b>																																			
PS1	PM/PP/HSG050	Longniddry South	450	0	450	0	0	25	50	75	375	75	75	75	75	75	375	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PS2	PM/PP/HSG099	Edinburgh Road / Dolphingstone	140	0	140	0	0	25	50	75	65	50	15	0	0	0	65	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Potential New Sites Totals</b>			<b>590</b>	<b>0</b>	<b>590</b>	<b>0</b>	<b>0</b>	<b>50</b>	<b>100</b>	<b>150</b>	<b>440</b>	<b>125</b>	<b>90</b>	<b>75</b>	<b>75</b>	<b>75</b>	<b>440</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>							
<b>Committed Sites AND Proposed Sites</b>			<b>898</b>	<b>239</b>	<b>659</b>	<b>31</b>	<b>20</b>	<b>50</b>	<b>100</b>	<b>201</b>	<b>458</b>	<b>125</b>	<b>108</b>	<b>75</b>	<b>75</b>	<b>75</b>	<b>458</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>							

# BLINDWELLS

## Future Housing Completions - Committed Sites plus Proposed LDP Sites

Site Ref	Latest Planning Ref	Site Name /Address	Total Dwellings	Complete by 03/15	Remaining as at 04/15					Totals	Remaining												Totals	Remaining							Totals						
						15-19	Post 18/19	19/20	20/21	21/22	22/23	23/24	19-24	Post 23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	24-32	Post 31/32	32/33	33/34	34/35	35/36	36/37	37/38	33/38						
<b>COMMITTED SITES - HOUSING LAND AUDIT 2013 SITES WITH UPDATED PROGRAMMING</b>																																					
E273	11/00173/PPM	Blindwells (Private)	1120	0	1,120	0	0	0	0	0	1,120	0	24	48	72	72	216	904	72	72	72	72	72	72	72	72	72	72	576	328	72	72	72	72	40	0	328
E273	11/00173/PPM	Blindwells (Social)	480	0	480	0	0	0	0	0	480	0	0	25	25	25	75	405	25	25	25	25	25	25	25	25	50	225	180	50	50	50	30	0	0	180	
<b>Committed Sites Totals</b>			<b>1,600</b>	<b>0</b>	<b>1,600</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,600</b>	<b>0</b>	<b>24</b>	<b>73</b>	<b>97</b>	<b>97</b>	<b>291</b>	<b>1,309</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>122</b>	<b>801</b>	<b>508</b>	<b>122</b>	<b>122</b>	<b>122</b>	<b>102</b>	<b>40</b>	<b>0</b>	<b>508</b>	
<b>PROPOSED LDP SITES</b>																																					
	PM/TT/OTH103	Blindwells Expansion Area	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Potential New Sites Totals</b>			<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Committed Sites AND Preferred Sites</b>			<b>1,600</b>	<b>0</b>	<b>1600</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1600</b>	<b>0</b>	<b>24</b>	<b>73</b>	<b>97</b>	<b>97</b>	<b>291</b>	<b>1309</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>97</b>	<b>122</b>	<b>801</b>	<b>508</b>	<b>122</b>	<b>122</b>	<b>122</b>	<b>102</b>	<b>40</b>	<b>0</b>	<b>508</b>	

**TRANENT**

**Future Housing Completions - Committed Sites plus Proposed LDP Sites**

Site Ref	Latest Planning Ref	Site Name /Address	Total Dwellings	Complete by 03/15	Remaining as at 04/15					Totals	Remaining												Totals	Remaining							Totals		
						15-19	Post 18/19	19/20	20/21	21/22	22/23	23/24	19-24	Post 23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	24-32	Post 31/32	32/33	33/34	34/35	35/36	36/37	37/38	33/38		
<b>COMMITTED SITES - HOUSING LAND AUDIT 2013 SITES WITH UPDATED PROGRAMMING</b>																																	
E255	02/00290/FUL	North Elphinstone Farm Tranent	14	13	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E284	06/01309/OUT	Land to south of Tranent Mains Farmhouse Tranent	29	12	17	17	0	0	0	0	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E430	07/00030/FUL	54 Bridge Street Tranent	8	0	8	0	0	0	0	0	8	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E292	03/00752/FUL	Humble - Highlea Steading	5	0	5	0	0	0	0	0	5	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E428	06/00387/FUL	Humble - Highlea Farm	6	0	6	0	0	0	0	0	6	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E305	12/00058/P	Macmerry - Westbank Steading	6	0	6	0	0	0	0	0	6	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E405	08/00085/FUL	Macmerry - Westbank Road (appeal allowed)	21	0	21	10	11	0	0	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E282a	11/00023/P	Ormiston - Limeyards Road	37	0	37	0	15	22	0	37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E282b	11/00023/P	Ormiston - Limeyards Road (AH)	12	0	12	0	0	0	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E282c	13/00909/P	Ormiston - Limeyards Road (Phase 2)	19	0	19	0	0	0	19	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E282d	13/00909/P	Ormiston - Limeyards Road (Phase 2) (AH)	5	0	5	0	0	0	0	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E310	06/00862/FUL	73-77 High Street Tranent	16	3	13	0	0	0	0	13	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E467	14/00050/P	22 - 24 Bridge Street Tranent	7	0	7	0	7	0	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E468	13/00739/P	Land at Elder Street Tranent	12	0	12	0	6	6	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E179		Pencaitland - Park View (Redmains)	30	0	30	0	0	0	0	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Committed Sites Totals</b>			<b>227</b>	<b>28</b>	<b>199</b>	<b>27</b>	<b>39</b>	<b>28</b>	<b>31</b>	<b>125</b>	<b>74</b>	<b>35</b>	<b>39</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>PROPOSED LDP SITES</b>																																	
IT1	PM/TT/HSG079	Windygoul South, Tranent	550	0	550	0	0	25	50	75	475	75	75	75	75	75	375	100	75	25	0	0	0	0	0	0	0	0	0	0	0	0	0
IT4	PM/TT/HSG087*	Lammermoor Terrace, Tranent	120	0	120	0	0	25	50	75	45	45	0	0	0	0	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IT5	PM/TT/HSG076	Bankpark Grove, Tranent	80	0	80	0	0	25	50	75	5	5	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IT7	PM/TT/HSG053	Macmerry North	150	0	150	0	0	25	50	75	75	50	25	0	0	0	75	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IT10	PM/TT/HSG077	Limeyards Road, Ormiston (combined with E282a-d)	70	0	70	0	0	0	0	0	70	20	20	20	10	0	70	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IT11	PM/TT/HSG014a*	Elphinstone Road West	80	0	80	0	0	25	50	75	5	5	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IT12	PM/TT/HSG102	Woodhall Road, Pencaitland	16	0	16	0	0	16	0	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IT13	PM/TT/HSG050	Lempockwells Road, Pencaitland	115	0	115	0	0	25	50	75	40	40	0	0	0	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IT15	PM/TT/HSG095	Humble North	20	0	20	0	0	10	10	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IT16	PM/TT/HSG012	East Saltoun	75	0	75	0	0	25	25	50	25	25	0	0	0	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IT9	PM/TT/HSG045	Gladsmuir East	20	0	20	0	0	10	10	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E179 (IT14)	PM/TT/HSG111	Redmains, Pencaitland (intensification)	25	0	25	0	0	0	0	0	25	0	25	0	0	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Potential New Sites Totals</b>			<b>1,321</b>	<b>0</b>	<b>1321</b>	<b>0</b>	<b>0</b>	<b>211</b>	<b>345</b>	<b>556</b>	<b>765</b>	<b>265</b>	<b>145</b>	<b>95</b>	<b>85</b>	<b>75</b>	<b>665</b>	<b>100</b>	<b>75</b>	<b>25</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Committed Sites AND Proposed Sites</b>			<b>1,548</b>	<b>28</b>	<b>1520</b>	<b>27</b>	<b>39</b>	<b>239</b>	<b>376</b>	<b>681</b>	<b>839</b>	<b>300</b>	<b>184</b>	<b>95</b>	<b>85</b>	<b>75</b>	<b>739</b>	<b>100</b>	<b>75</b>	<b>25</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

# HADDINGTON

## Future Housing Completions - Committed Sites plus Proposed LDP Sites

Site Ref	Latest Planning Ref	Site Name /Address	Total Dwellings	Complete by 03/15	Remaining as at 04/15					Totals							Totals							Totals																	
						15-16	16/17	17/18	18/19	15-19	Post 18/19	19/20	20/21	21/22	22/23	23/24	19-24	Post 23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	24-32	Post 31/32	32/33	33/34	34/35	35/36	36/37	37/38	33/38						
<b>COMMITTED SITES - HOUSING LAND AUDIT 2013 SITES WITH UPDATED PROGRAMMING</b>																																									
E265	11/00004/PAN	Letham Mains Haddington (Private)	669	0	669	0	10	90	150	250	419	112	116	145	46	0	419	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E265	11/00004/PAN	Letham Mains Haddington (Social)	140	0	140	0	0	44	0	44	96	30	36	0	30	0	96	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E307	04/01274/FUL	West Road, Haddington	23	0	23	0	0	0	0	0	23	0	23	0	0	0	23	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E303	06/00415/FUL	Bolton - Under Bolton Steading	38	21	17	6	6	5	0	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E278		Gifford - Gifford Garage	10	0	10	0	0	0	0	0	10	0	10	0	0	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E458	11/00663/P	Begbie Farm Steading	15	0	15	0	5	5	5	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E466	13/00071/PPM	Dovecot	113	0	113	0	25	53	35	113	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E470	12/00199/PPM	Alderston	89	0	89	0	25	25	25	75	14	14	0	0	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E471	13/00627/P	Mill Wynd	49	0	49	6	43	0	0	49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E473	13/00800/PPM	Land west of Gateside Road	79	0	79	12	30	30	7	79	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E475	14/00219/PM	Land at former Gateside Commerce Park	112	0	112	0	24	24	24	72	40	24	16	0	0	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E454	08/00188/FUL	Chesters Farm Haddington	11	0	11	0	0	0	0	0	11	0	11	0	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
<b>Committed Sites Totals</b>			<b>1,348</b>	<b>21</b>	<b>1,327</b>	<b>24</b>	<b>168</b>	<b>276</b>	<b>246</b>	<b>714</b>	<b>613</b>	<b>180</b>	<b>212</b>	<b>145</b>	<b>76</b>	<b>0</b>	<b>613</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	
<b>PROPOSED LDP SITES</b>																																									
HN2	PM/HN/HSG044b	Letham Mains Expansion	275	0	275	0	0	0	0	0	275	0	0	0	50	96	146	129	96	33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
HN3	PM/HN/HSG106a	Dovecot 2 (combined with E466)	80	0	80	0	0	25	50	75	5	5	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
<b>Potential New Sites Totals</b>			<b>355</b>	<b>0</b>	<b>355</b>	<b>0</b>	<b>0</b>	<b>25</b>	<b>50</b>	<b>75</b>	<b>280</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>50</b>	<b>96</b>	<b>151</b>	<b>129</b>	<b>96</b>	<b>33</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>								
<b>Committed Sites AND Proposed Sites</b>			<b>1,703</b>	<b>21</b>	<b>1682</b>	<b>24</b>	<b>168</b>	<b>301</b>	<b>296</b>	<b>789</b>	<b>893</b>	<b>185</b>	<b>212</b>	<b>145</b>	<b>126</b>	<b>96</b>	<b>764</b>	<b>129</b>	<b>96</b>	<b>33</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>								



# NORTH BERWICK

## Future Housing Completions - Committed Sites plus Proposed LDP Sites

Site Ref	Latest Planning Ref	Site Name /Address	Total Dwellings	Complete by 03/15	Remaining as at 04/15					Totals	Remaining											Totals	Remaining							Totals					
						15/16	16/17	17/18	18/19	15-19	Post 18/19	19/20	20/21	21/22	22/23	23/24	19-24	Post 23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	24-32	Post 31/32	32/33	33/34	34/35	35/36	36/37	37/38	33/38
<b>COMMITTED SITES - HOUSING LAND AUDIT 2013 SITES WITH UPDATED PROGRAMMING</b>																																			
E269a	13/00227/PPM	Mains Farm North Berwick (Private)	315	0	315	18	38	48	50	154	161	72	49	30	10	0	161	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
E269a	13/00227/PPM	Mains Farm North Berwick (Social)	105	0	105	0	26	24	0	50	55	24	31	0	0	0	55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
E269bi	12/00338/PM	Gililand Newhouse Farm (Private)	53	12	41	20	11	10	0	41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
E269bi	12/00338/PM	Gililand Newhouse Farm (Social)	18	0	18	0	0	18	0	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E269bii	12/00339/PM	Gililand Caravan Site (Social)	12	0	12	12	0	0	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E062	08/00148/FUL	Athelstaneford - Mansfield	19	0	19	0	0	0	0	0	19	0	19	0	0	0	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E306	04/01059/FUL	Campoun Steading Conversion	14	10	4	0	1	1	1	3	1	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E215i	01/00504/FUL 12/01000/P	Dirleton - Archerfield Estate (The Village & Duncan's Plantation)	71	63	8	1	1	1	1	4	4	1	1	1	1	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E215ii	12/00999/P 06/01005/REM	Dirleton - Archerfield Estate (Kings Cairn)	20	0	20	0	0	8	12	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E215iii	10/00640/P	Dirleton - Archerfield Estate (Western Part)	12	3	9	1	1	1	1	4	5	1	1	1	1	1	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E440	08/00078/OUT	Whitekirk Golf & Country Club North Berwick	42	0	42	0	0	0	0	0	42	0	10	10	10	12	42	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E444	09/00494/FUL	Kingston Farm North Berwick East Lothian	20	0	20	0	0	0	0	0	20	0	10	10	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E465	13/00945/P	Dirleton Court	7	0	7	7	0	0	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E449	10/00527/P	New Mains Dirleton North Berwick	6	0	6	0	3	3	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Committed Sites Totals</b>			<b>714</b>	<b>88</b>	<b>626</b>	<b>59</b>	<b>81</b>	<b>114</b>	<b>65</b>	<b>319</b>	<b>307</b>	<b>99</b>	<b>121</b>	<b>52</b>	<b>22</b>	<b>13</b>	<b>307</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>PROPOSED LDP SITES</b>																																			
NK4	PM/NK/HSG070	Tantallon Road, North Berwick	125	0	125	0	0	25	50	75	50	50	0	0	0	0	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NK6	PM/NK/HSG112	Fire Service College, Gullane	100	0	100	0	0	25	50	75	25	25	0	0	0	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NK7	PM/NK/HSG060	Saltcoats, Gullane	130	0	130	0	0	25	50	75	55	50	5	0	0	0	55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NK11	PM/NK/HSG048	Castlemains, Dirleton	30	0	30	0	0	15	15	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NK5	SDP/NK/HSG004	Ferrygate, North Berwick	140	0	140	0	0	25	50	75	65	50	15	0	0	0	65	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NK9	PM/NK/HSG088	Fentoun Gait South, Gullane	15	0	15	0	0	15	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NK8	PM/NK/HSG026b	Fentoun Gait East, Gullane	50	0	50	0	0	25	25	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NK10	PM/NK/HSG039	Aberlady West	100	0	100	0	0	25	50	75	25	25	0	0	0	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Potential New Sites Totals</b>			<b>690</b>	<b>0</b>	<b>690</b>	<b>0</b>	<b>0</b>	<b>180</b>	<b>290</b>	<b>470</b>	<b>220</b>	<b>200</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>220</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Committed Sites AND Proposed Sites</b>			<b>1,404</b>	<b>88</b>	<b>1316</b>	<b>59</b>	<b>81</b>	<b>294</b>	<b>355</b>	<b>789</b>	<b>527</b>	<b>299</b>	<b>141</b>	<b>52</b>	<b>22</b>	<b>13</b>	<b>527</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>



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