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East Dunbartonshire Council

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East Dunbartonshire Local Development Plan 3

Draft Housing Technical Paper

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1. Executive Summary

- 1.1. This Housing Technical Paper was prepared from 2024 to 2026 through continuing engagement and appraisal as part of the East Dunbartonshire Local Development Plan 3 (LDP3) preparation process. Please note that the paper has been worded in advance to reflect its final completed form and that it will be updated as part of the preparation of the LDP3 Proposed Plan.
- 1.2. **Part 1** of the paper sets out the approach that has been taken to determine the Minimum All-Tenure Housing Land Requirement (MATHLR) and Local Housing Land Requirement (LHLR) for LDP3. It addresses both market and affordable housing and provides information on the context within which the MATHLR and LHLR have been established. It justifies the approach taken to the determination of the MATHLR and LHLR in the preparation of LDP3 within the context of the National Planning Framework (NPF4).
- 1.3. The paper also provides a breakdown of the total indicative capacity of all housing land allocated in the Proposed LDP3, the number of dwellings estimated to be completed as part of non-allocated windfall development, and the extent to which the total housing land supply meets both the MATHLR and LHLR.
- 1.4. The 10-year MATHLR and LHLR for East Dunbartonshire LDP3 is set out in Table 1. The total indicative allocated housing land supply for the Proposed East Dunbartonshire LDP3 is separated into affordable and private market provision and presented as an overall total.

Figure	Market Housing	Affordable Housing	TOTAL Housing
MATHLR	2500		250 p.a.
LHLR	2700		270 p.a.
Total allocated supply	TBD	TBD	TBD

TABLE 1. MATHLR, LHLR AND ALLOCATED SUPPLY

- 1.5. More detail on the background to and determination of the MATHLR, LHLR and indicative allocated housing land supply for East Dunbartonshire can be seen in subsequent sections. The initial housing land pipeline can be seen in Appendix 8I.
- 1.6. **Part 2** of the Housing Technical Paper provides a summary of relevant information in relation to the provision of good quality homes within East Dunbartonshire.
- 1.7. The Housing Technical Paper preparation process is presented below alongside each LDP3 preparation stage and applicable year(s).

Evidence Report	Gate Check	Call for Ideas/Sites	Proposed Plan	Examination
Stage 2	Stage 3	Stage 4A	Stage 4B	Stage 5
2023-2024	2024-2025	2025	2025-2026	2026-2027
Discussion of Draft Housing Technical Paper (including LHLR) with topic group and key stakeholders	Presentation of indicative LHLR in Evidence Report and explanation in Draft Housing Technical Paper of how the figure has been established	Further preparation of Draft Housing Technical Paper.	Housing Technical Paper finalised to accompany Proposed LDP3. The paper sets out allocated and windfall supply.	Consideration of content of final Housing Technical Paper (including LHLR vs. total land supply) by reporter as part of Proposed LDP3 examination

TABLE 2. HOUSING TECHNICAL PAPER PREPARATION STAGES

Part 1 - Housing Land Supply

2. Context & Overview

National Planning Framework 4 (NPF4)

- 2.1. Adopted in February 2023, the National Planning Framework (NPF) is a long-term plan for Scotland that sets out where development and infrastructure is needed to support sustainable and inclusive growth. NPF4 replaces NPF3, incorporates Scottish Planning Policy (SPP) and forms part of the statutory development plan alongside the Local Development Plan. NPF4 sets out a Minimum All-Tenure Housing Land Requirement (MATHLR) for each planning authority in Scotland and expects that LDPs should set a Local Housing Land Requirement (LHLR) to exceed the MATHLR.

Housing Need & Demand Assessment (HNDA3)

- 2.2. The Housing Need and Demand Assessment (HNDA) is a tool used to produce scenarios of anticipated housing need based on nationally produced data sets. It informs policy development, decision-making and the use of resources by enabling local authorities to develop long-term strategic views of housing need and demand to inform the Local Housing Strategy (LHS) and Local Development Plan (LDP) preparation processes. It supports local authorities to develop a strategic approach to housing need and demand and provides robust evidence to support decisions about new housing supply, wider investment and housing-related services. It provides evidence to inform policies about the proportion of affordable housing required, including the need for different types and sizes of provision, and helps to inform policies related to the provision of specialist housing.
- 2.3. Following publication of HNDA1 in 2011 and HNDA2 in 2015, preparation of a third HNDA for the Glasgow City Region (HNDA3) began in 2021. HNDA3 employs the [HNDA Toolkit](#) and [new guidance](#) from the Scottish Government's Centre for Housing Market Analysis (CHMA), each of which was designed with the intention to rationalise and streamline the assessment process. Since 2021, significant challenges have emerged within the city region around increasing energy prices, interest rates, inflation and public sector funding. These have been factored into the final tool outputs. HNDA3 was submitted to the CHMA for final assessment in spring 2024 and obtained 'Robust and Credible' status on 07/06/2024. One of the principal findings of HNDA3 is that East Dunbartonshire LDP3 will require to allocate land for up to **2450** dwellings during the plan period.
- 2.4. Further detail on the preparation of HNDA3 can be seen in [Appendix 1](#).

Local Housing Strategy (LHS) 2023-2028

- 2.5. The East Dunbartonshire [Local Housing Strategy 2023-2028](#) sets out the strategic direction, policies and plans that will enable the Council and partners to deliver high quality housing and housing services to meet the needs of local people across all housing tenures. The LHS was prepared to factor in the outputs of HNDA2 and HNDA3 and sets a Housing Supply Target (HST) of **245** dwellings per annum, of which 95 (39%) would be affordable and 150 (61%) private market by tenure.
- 2.6. It should be noted that the whilst the current LHS period will end prior to the likely adoption of LDP3 in 2028, the strategy nevertheless provides a useful contribution to the understanding of housing need and demand. The rate of completions expressed in the HST and the ratio of affordable to market housing has therefore been reflected in the breakdown by tenure in the LHLR as set out in the [Executive Summary](#). The LHS notes that 'Local Development Plans must exceed the Minimum All Tenure Housing Land Requirement' and that it consequently may be necessary for the HST to be amended during the lifetime of the LHS, so as to account for the definition of the LHLR (see below).

Minimum All-Tenure Housing Land Requirement (MATHLR)

- 2.7. The [Planning \(Scotland\) Act 2019](#) sets out a requirement for NPF4 to include ‘targets for the use of land in different areas of Scotland for housing’. The Minimum All-Tenure Housing Land Requirement (MATHLR), as this target is described, constitutes the minimum amount of housing land to be allocated within each Local Development Plan (LDP). It is expected that LDPs should identify land to at least meet the minimum requirement or figure.
- 2.8. As part of the Draft NPF4 consultation exercise which encompassed all Planning Authorities in Scotland, the Scottish Government/Centre for Housing Market Analysis (SG/CHMA) presented to East Dunbartonshire Council in early 2021 an initial default MATHLR estimate of 3200 dwellings to be allocated during the 10-year LDP3 period. This figure comprised a housing estimate (homeless households in temporary accommodation and households both overcrowded and concealed, plus newly forming households) of 2550 dwellings, with a generosity of 25% applied, producing a total of 3200 dwellings (when rounded).
- 2.9. Following submission of a final evidence paper to the CHMA and after further discussion within the Glasgow City Region Housing Market Partnership, it was agreed that the locally adjusted estimate for East Dunbartonshire would be 2550 units. This figure comprised 2013 units, a reduction from 2567 units following application of mobile demand, with a flexibility of 25% added. Agreed by the SG/CHMA, the rounded figure presented in the adopted in NPF4 is **2500** dwellings.
- 2.10. Further detail on the determination of the MATHLR can be seen in [Appendix 2](#).

Local Housing Land Requirement (LHLR)

- 2.11. NPF4 Policy 16 states that ‘LDPs are expected to identify a Local Housing Land Requirement for the area they cover. This is to meet the duty for a housing target and to represent how much land is required. To promote an ambitious and plan-led approach, the Local Housing Land Requirement is expected to exceed the 10-year (MATHLR).’ It continues that ‘deliverable land should be allocated to meet the 10-year Local Housing Land Requirement in locations that create quality places for people to live’. The Local Development Planning Guidance states that ‘in assessing the Evidence Report at the Gate Check, the reporter is expected to take a view on whether there is sufficient information in the Evidence Report to establish the indicative LHLR.’
- 2.12. Further detail on the determination of the LHLR, including an analysis of responses to the consultation on the preferred figure and the Council’s response, can be seen in [Appendix 3](#).

3. Supply of Land for Housing

3.1. Table 2 below presents the housing land supply that is required to be allocated in LDP3 for the plan period 2028-2038 (MATHLR and LHLR), the sum total of land that is proposed to be allocated in LDP3 and additional land that it is estimated could be developed based on programmed and potential windfall completions, as well as the possible reoccupation of vacant and second homes.

East Dunbartonshire		
Preparation Step		Supply of Land for Housing
A	HNDA3 2024 (East Dunbartonshire portion)	2450
B	Uplift from HNDA3 to MATHLR*	+50
C	Minimum All-Tenure Housing Land Requirement (MATHLR)	2500
D	Uplift from MATHLR to LHLR	250
E	Local Housing Land Requirement (LHLR)	2700
	<i>Market</i>	TBD
	<i>Affordable</i>	TBD
F	Housing Land (Allocated)	TBD
	<i>Market</i>	TBD
	<i>Affordable</i>	TBD
	<i>LHLR plus allocated as %</i>	TBD
G	Surplus/Windfall**	TBD
	<i>Market</i>	TBD
	<i>Affordable</i>	TBD
H	Total Housing Land Supply	TBD
	<i>Market</i>	TBD
	<i>Affordable</i>	TBD
I	Housing Land Supply Surplus	TBD
	<i>LHLR plus all supply as %</i>	TBD

TABLE 3. SUPPLY OF LAND FOR HOUSING. *HNDA AND MATHLR PROCESSES SEPARATE BUT ANALOGOUS. **INCLUDES REOCCUPIED HOMES

3.2. Table 3 below provides further background and explanation to the figures that have been presented as 10-year totals within Table 2. For reference, each element is titled with the same letter as depicted in Table 2. Table 3 describes the inputs that have produced each figure above and directs the reader towards the relevant Appendix within which more detail can be found.

3.3. The surplus/windfall presented in (G) in Table 2, Table 3 and in [Appendix 8](#) is an *estimate* of potential private market and affordable residential completions and occupations during the LDP3 period. The surplus/windfall comprises land and property that has not been allocated in LDP3. There therefore exists the potential that delivery may not proceed as predicted. The purpose of the surplus/windfall presented is to represent what *may* occur if programmed trends at the time of writing are to continue for the LDP3 period, so as to highlight the potential for additional completions above allocated housing land supply. These assumptions have been based on information drawn from the 20XX HLA, the SHIP 20XX-20XX and Scottish Government empty homes data.

East Dunbartonshire			
Preparation Step	Calculation/Detail	Commentary	
A	Glasgow and the Clyde Valley Housing Need and Demand Assessment 2024 (HNDA3)	Appendix 1	HNDA3 estimates a requirement for 4,642 additional units during the 2022 to 2040 time period or approximately 245 dwellings per annum or 2450 for the LDP3 period.
B	Uplift from HNDA3 to MATHLR	↑	An uplift of 50 units can be accounted for by means of the rounding undertaken as part of the preparation of the MATHLR figure.
C	Minimum All-Tenure Housing Land Requirement (MATHLR)	Appendix 2	An East Dunbartonshire-wide MATHLR of 2500 units has been determined through engagement with the CHMA/SG as part of the Glasgow City Region Housing Market Partnership. The MATHLR comprises an existing need and newly forming households (minus mobile demand) figure of 2013 dwellings (the principal projection), with 25% flexibility added.
D	Uplift from MATHLR	↑	The uplift from the MATHLR is summarised in part E below.
E	Local Housing Land Requirement (LHLR)	Appendix 3	An LHLR of 2700 units has been established, based on applying the high migration scenario with the same approach used to determine the MATHLR (see D above).
F	Allocated Housing Land Supply	Appendix 8	The housing land supply figure of XXXX units includes the total indicative capacity of all those residential sites allocated in the Proposed LDP3. Of this, land specifically allocated for affordable dwellings, or which would be covered by the affordable housing policy as part of private market development would accommodate XXXX dwellings.
G	Surplus/Windfall	Appendix 7	<p>The anticipated level of windfall development has been drawn from three separate sources.</p> <p>The first source is windfall development (development taking place within sites not proposed to be allocated in LDP3) from the SHIP 20XX-20XX.</p> <p>The second source is private market windfall development as drawn from the X programming years of the 20XX HLA with the remaining X years estimated using past completions. Average yearly small-scale housebuilding within sites of three units or fewer has also been included.</p> <p>The third source is the most recent tally of empty dwellings as set out in Scottish Government statistics.</p>
H	Total Housing Land Supply	F + G Appendix 8	The total housing land supply comprises the indicative allocated housing land supply described in (F) plus the potential surplus of windfall development and reoccupation of empty homes described in (G). The total housing land supply of XXXX is therefore an <i>estimate</i> of land that is available through allocation and with <i>the potential</i> to become available through windfall development taking place on non-allocated land and the reoccupation of empty dwellings.
I	Housing Land Supply Surplus	H - E	The housing land supply surplus is the total housing land supply (H) minus the LHLR (E). The overall surplus of XXXX units demonstrates that there is a sufficient surplus of land in addition to the LHLR to accommodate further development and allow for flexibility and choice.

TABLE 3. SUPPLY OF LAND FOR HOUSING – DETAIL.

Part 2 - Housing Quality

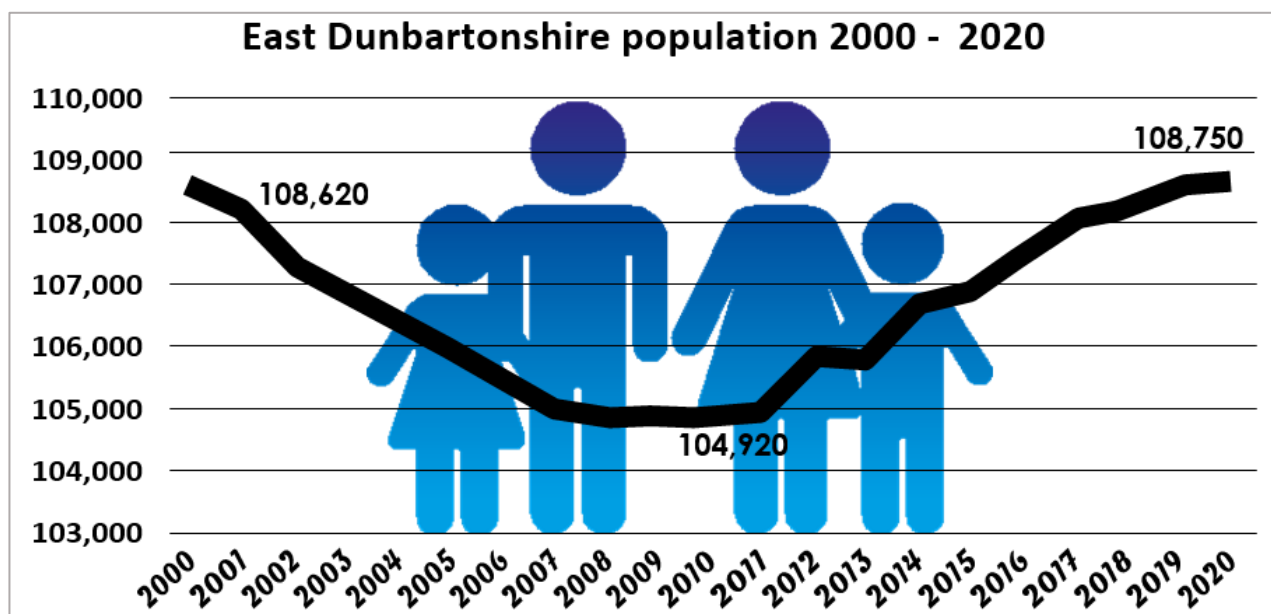
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4. Introduction

- 4.1. This section of the paper is intended to summarise relevant information in relation to the provision of good quality homes within East Dunbartonshire. The aim is to enable a good level of understanding on what a future planning policy on housing quality should be taking into consideration. In particular, what standards of design should be followed, and what is the broader policy framework for achieving this?
- 4.2. This is separate from evidence relating to housing land requirement and general housing targets, which can be seen above. The intention is to collate appropriate information and data on housing quality that can then be included within the LDP3 Evidence Report.

5. East Dunbartonshire Profile

- 5.1. The demographic profile of places has a big impact on the type of housing required. This section sets out relevant statistics on population and households, to provide a basis for future policy requirements. The population in East Dunbartonshire has remained static over the last 20 years, compared to a population increase of over 7% in Scotland. Between 2000 and 2010, there was a sustained decline in the East Dunbartonshire population, from 108,620 in 2000 to 104,920 in 2010. Since 2010, this decline has reversed and in the recent decade has restored the population loss back to 2000 levels.



- 5.2. Despite a projected increase in overall population of 3.8% between 2018-2028, the older population is expected to substantially increase by 25.9% over the same period in East Dunbartonshire. East Dunbartonshire already benefits from **higher life expectancy** than the rest of Scotland and this trend is projected to continue. East Dunbartonshire has an **affluent, educated and highly skilled population**. However, East Dunbartonshire has a reputation as being a commuter location, with only 25% of residents working locally.

- 5.3. Average residential **property prices** in 2010/11 - 2020/21 East Dunbartonshire has the fourth highest average house price in Scotland. In 2020/21, the average house price in East Dunbartonshire was £258,215 which is significantly beyond the Scottish average house price at £194,100.
- 5.4. Analysis of the housing market in East Dunbartonshire reveals that local households must spend significantly more than the typical 3.9 X's mortgage multiplier to afford the average house price. Instead, local households need to devote over five times their income to meet the costs of the average property.
- 5.5. There are approximately 47,500 dwellings in East Dunbartonshire to meet the needs of the local population. 84% homes in East Dunbartonshire are in the owner- occupied sector, which is significantly higher than the proportion in Scotland (62%). The social housing sector accommodates just under 10% of households living in East Dunbartonshire, significantly less than the national profile at 26%. As of September 2022, the Council had circa 2600 applicants on the Housing List.

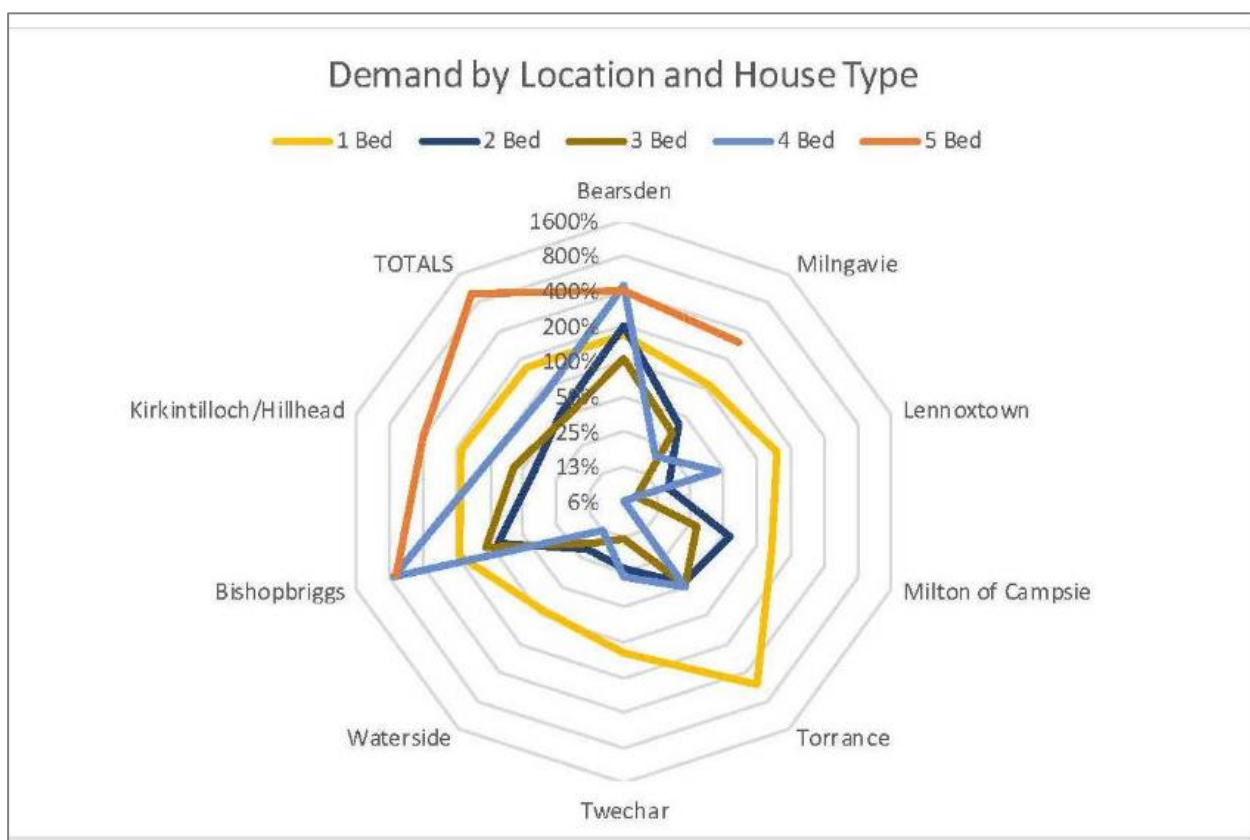


FIGURE 1. RELATIVE DEMAND FOR AFFORDABLE HOUSING PER PROPERTY TYPE AND AREA.

6. Evidence Sources

The Town and Country Planning (Development Planning) (Scotland) Regulations 2023

Evidence Report Requirements - Section 16B(3)(b)(i))

- 6.1. The Town and Country Planning (Development Planning) (Scotland) Regulations came into force in May 2023, as secondary legislation under the Planning (Scotland) Act 2019. They set out the specific requirements for the development plan process including the preparation of Evidence Reports, Local Development Plans,

Examinations, Development Plan Schemes and Delivery Programmes. The Regulations state that Evidence Report must set out a summary of the action taken by the planning authority to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority's area, and an analysis of the extent to which the action has helped to meet those needs.

National Planning Framework 4 – Policy 16: Quality Homes

6.2. The fourth National Planning Framework (NPF4) sets out a vision for what Scotland, could and should look like in 2050. It includes national planning policies and provides a plan for future development in Scotland. Driven by the overarching goal of addressing climate change, this long-term strategy focuses on achieving four key outcomes:

- 1) Net zero emissions
- 2) A wellbeing economy
- 3) Resilient communities
- 4) Better, greener places.

6.3. Concepts such as the 20-minute neighbourhood, use of the Place Principle, prioritising brownfield development and a fabric first approach to decarbonising homes and communities will together influence the policy approach to providing quality homes in East Dunbartonshire.

NPF 4 Policy 16 - Intent

6.4. *'To encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland'.*

NPF 4 Policy 16 - Outcomes

- 6.5. 'To encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland'
- Good quality homes are at the heart of great places and contribute to strengthening the health and wellbeing of communities.
 - Provision of land in the right locations to accommodate future need and demand for new homes, supported by the appropriate infrastructure.
 - More energy efficient, net zero emissions homes, supporting a greener, fairer and more inclusive wellbeing economy and community wealth building, tackling both fuel and child poverty.

Planning Advice Note 67 (PAN 67) – Housing Quality

6.6. PAN 67, published in 2003, provides a detailed analysis of high-quality housing design. It remains a key reference point for everyone involved in the designing and planning of new housing projects. The advice note explains how the principles of the Designing Places document (2001) should be applied in practice. It is aimed at planners, architects, urban designers and other practitioners in the design process. It also sets out the role of the development planning process in ensuring that:

- the design of new housing reflects a full understanding of its context – in terms of both

- the design of new housing reinforces local and Scottish identity
 - new housing is integrated into the movement and settlement patterns of the wider area.
- 6.7. The document is focused around 5 key themes: (1) Layout, (2) Landscape, (3) Scale & Mix, (4) Details & Materials and (5) Maintenance. Each of these sections includes a list of ‘issues to consider’ which is intended as a checklist. These factors should inform a development plan’s design policies, urban design guidance, design statements and discussions between developers and planners.

‘The local authority’s development plan should set out a clear, robust planning policy framework which, in addition to much else, describes how the principles of design should shape development. The plan should also be a convincing statement of the council’s commitment to high standards of housing design’.

- 6.8. The PAN also includes a number of case studies for reference.

Housing to 2040

- 6.9. [Housing to 2040](#) sets out a vision for housing in Scotland to 2040 and a route map to get there. It aims to deliver our ambition for everyone to have a safe, good quality and affordable home that meets their needs in the place they want to be.

‘Our aim is for all homes to be good quality, whether they be new build or existing, meaning everyone can expect the same high standards no matter what kind of home or tenure they live in’.



- 6.10. In terms of improving the quality of homes, there are two main principles:

High-quality and sustainable homes

- 6.11. Where all homes are well-designed and of a high standard, allowing people to live well no matter what kind of home or tenure they live in. New build homes will be built to high standards from the outset and existing homes are able to be adapted and improved, with support for homeowners and householders to maintain, improve and repair their homes. This is supported by the principles of tenure-neutral standards and requiring housing developers and homeowners to ensure their properties are built and maintained to a high standard.

Homes that meet people’s needs

6.12. Where homes support people’s wellbeing by being easily adaptable and with enough space to live well and there are a range of housing options available to meet different needs. This is supported by the principle that homes and the housing market are flexible to allow people to find, create or move to a home that meets their needs throughout their life.

6.13. There are a number of actions that are included to support its overall ambitions. Relevant ones are as follows *(not all of the following actions have a land use element however they have been included for completeness)*:

Ambition	Action	Description
Affordable warmth and zero emissions homes	Action 12: Align the work set out in Housing to 2040 with the draft Heat in Buildings Strategy so both work together to deliver our statutory targets for climate change and fuel poverty, and the milestones in between, in a fair and just way.	N/A
	Action 13: Aim for all new homes delivered by Registered Social Landlords and local authorities to be zero emissions by 2026.	<ul style="list-style-type: none"> • Fit zero emissions heating systems in all new build social homes ahead of the 2024 regulations coming into force. • Make greater use of offsite construction in the social rented sector. • Test approaches to offsite construction and Community Carbon initiatives through the Edinburgh Home Demonstrator Project.
	Action 14: Adapt and retrofit existing homes to improve their energy efficiency and decarbonise their heating systems.	<ul style="list-style-type: none"> • Invest in energy efficiency and heat decarbonisation of buildings, with almost £1.6 billion investment committed over the next five years. • Regulate to set minimum energy efficiency standards between 2023 and 2025. • Establish a Zero Emissions Social Housing Task Force to advise on requirements in social housing to meet zero emissions for existing homes and inform, longer-term, what is required for existing homes in the private rented sector and owner-occupied sectors.

		<ul style="list-style-type: none"> • Assess the feasibility of council-led taskforces to undertake retrofit and other green construction projects. • Implement a public engagement strategy for heat in buildings. • Support a ramping up of investment in heat decarbonisation from 2025 onwards.
	<p>Action 15: Modernise housing construction, particularly through offsite construction.</p>	<ul style="list-style-type: none"> • Publish a new strategy for zero emissions new build affordable homes, based on offsite construction, and take into account new techniques and technologies, supply chain resilience and associated training and skills needs. • Introduce a new business model for the delivery of affordable homes where Registered Social Landlords and councils, designers, regulators and builders work closely together from day one, there is greater standardisation of components (without compromising on design quality) and costs are assessed across the whole lifetime of the project. • Work with councils and housing associations to develop a more visible pipeline of future offsite development. • Develop a housing sectoral plan by 2022 to prioritise the delivery of green housing investments. • Work with the Construction Scotland Innovation Centre, Scottish Futures Trust and others to establish a housing innovation programme to reshape demand towards design for manufacture and assembly.
<p>Improving the quality of all homes</p>	<p>Set tenure-neutral standards so that everyone can live with dignity and in comfort, no matter what tenure they live in.</p>	<ul style="list-style-type: none"> • Introduce legislation for a new Housing Standard in 2024/25, for phased introduction from 2025 to 2030, aiming to cover all homes new and existing, with no margins of tolerance, no exemptions and no “acceptable levels” of sub-standard homes. • Take action to support proactive approaches to repair and maintenance to help owners avoid high-cost interventions later. • Develop a new Help to Improve approach to support homeowners and landlords pay for improvement work. This will operate alongside existing and planned support for energy efficiency

		<p>and zero emissions heating systems, allowing us to take a whole house approach where possible.</p> <ul style="list-style-type: none"> • Introduce an enforcement framework to support the new Standard, which could come into force in phases between 2025 and 2030, recognising that different types of homes in different places may need more or less time to achieve compliance. • Work with UK Government to deliver a New Homes Ombudsman which extends to Scotland but respects devolution.
	Action 19: Bring digital connectivity to homes, tackling the digital divide.	<ul style="list-style-type: none"> • Phase in the requirement from 2021/22 that all new build social rented homes delivered through the Affordable Housing Supply Programme are digitally enabled. • Work with social housing providers through the new Rented Sector Strategy and consider digital connectivity in the review of the Social Rented Housing Charter in 2021. • Include digital connectivity in the scope of our consultation on the new Housing Standard to see how it can be made available in all homes, no matter what tenure.
	Action 20: Ensure that everyone who wants to is enabled to live independently in a home of their own.	<ul style="list-style-type: none"> • Review Housing for Varying Needs. • Introduce a new focus on increasing the supply of accessible and adapted homes and improving choice, particularly for younger disabled people. • Use NPF4 to help make more accessible homes available by helping to deliver tenure-neutral wheelchair housing targets, supporting sites for self-provided housing and delivering homes in accessible locations. • Introduce new building standards from 2025/26 to underpin a Scottish Accessible Homes Standard which all new homes must achieve. • Establish an inclusive programme of retrofitting social homes. • Streamline and accelerate the adaptations system. • Address the practical barriers faced by older and disabled home movers who wish to move to a home that better meets their needs. • Take action to better integrate the work of housing and health and social care

		<p>services and deliver a person-centred approach, including the implementation of a joint accountability and outcomes framework.</p> <ul style="list-style-type: none"> • Improve the ways that housing and health services support people experiencing addiction, helping them to find settled homes and access flexible support for their other needs.
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TABLE 4. HOUSING TO 2040 AMBITIONS AND ACTIONS

- 6.14. Where homes support people’s wellbeing by being easily adaptable and with enough space to live well and there are a range of housing options available to meet different needs. This is supported by the principle that homes and the housing market are flexible to allow people to find, create or move to a home that meets their needs throughout their life.
- 6.15. Where homes support people’s wellbeing by being easily adaptable and with enough space to live well and there are a range of housing options available to meet different needs. This is supported by the principle that homes and the housing market are flexible to allow people to find, create or move to a home that meets their needs throughout their life.
- 6.16. Where homes support people’s wellbeing by being easily adaptable and with enough space to live well and there are a range of housing options available to meet different needs. This is supported by the principle that homes and the housing market are flexible to allow people to find, create or move to a home that meets their needs throughout their life.
- 6.17. Where homes support people’s wellbeing by being easily adaptable and with enough space to live well and there are a range of housing options available to meet different needs. This is supported by the principle that homes and the housing market are flexible to allow people to find, create or move to a home that meets their needs throughout their life.
- 6.18. Where homes support people’s wellbeing by being easily adaptable and with enough space to live well and there are a range of housing options available to meet different needs. This is supported by the principle that homes and the housing market are flexible to allow people to find, create or move to a home that meets their needs throughout their life.
- 6.19. Where homes support people’s wellbeing by being easily adaptable and with enough space to live well and there are a range of housing options available to meet different needs. This is supported by the principle that homes and the housing market are flexible to allow people to find, create or move to a home that meets their needs throughout their life.

Heat in Buildings Strategy

- 6.20. The Scottish Government’s Heat in Buildings Strategy sets out a vision for the future of heat in buildings, and the actions being taking in the buildings sector to deliver on climate change commitments, maximise economic opportunities, and ensure a just transition, including helping address fuel poverty. The focus of the Strategy is on energy demand for space and water heating in homes, workplaces and community buildings.
- 6.21. To meet our net zero target, by 2045 all homes and buildings in Scotland must have significantly reduced their energy use, and almost all must be using a zero emissions heating system. As set out in the Scottish

Government’s Climate Change Plan Update, emissions for homes and non-domestic buildings combined will have to fall by 68% by 2030 as compared to 2020.

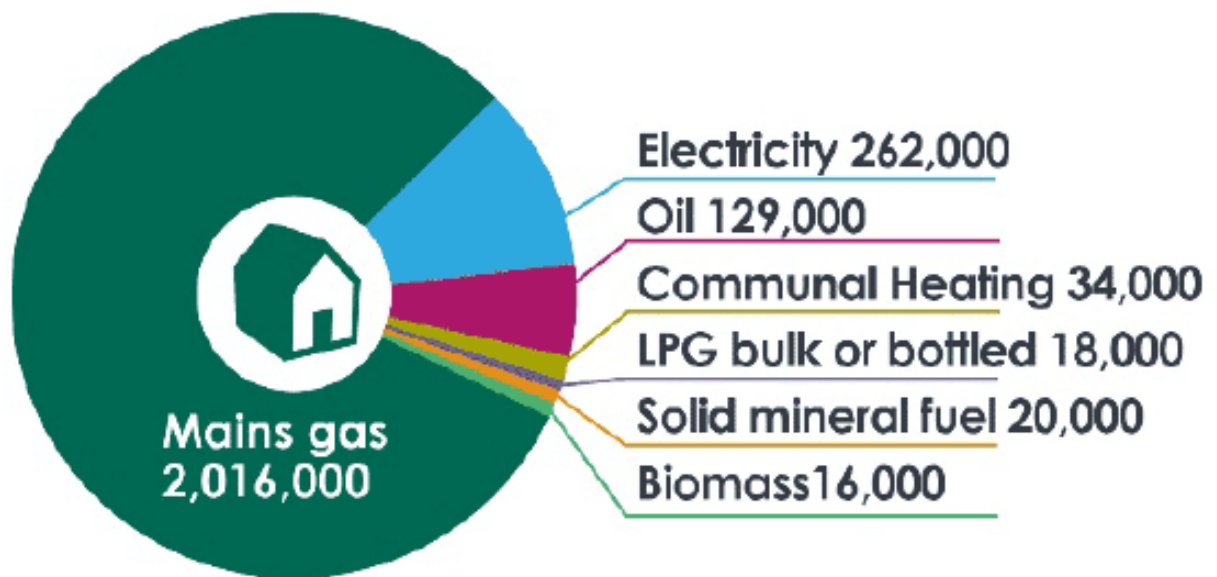


FIGURE 2 - BREAKDOWN OF PRIMARY HEATING FUEL VS NUMBER OF HOMES (SOURCE SCOTTISH HOUSE CONDITION SURVEY, 2019)

6.22. It is essential that homes and buildings achieve a good standard of energy efficiency, and that poor energy efficiency is removed as a driver of fuel poverty. Where technically and legally feasible and cost-effective, by 2030 a large majority of buildings should achieve a good level of energy efficiency, which for homes is at least equivalent to an EPC Band C, with all homes meeting at least this standard by 2033.

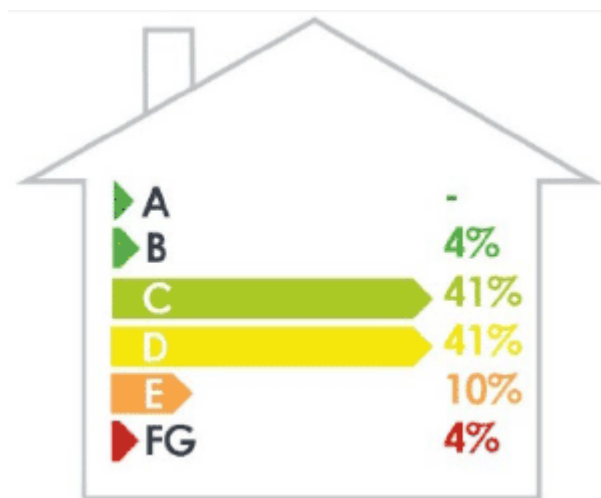
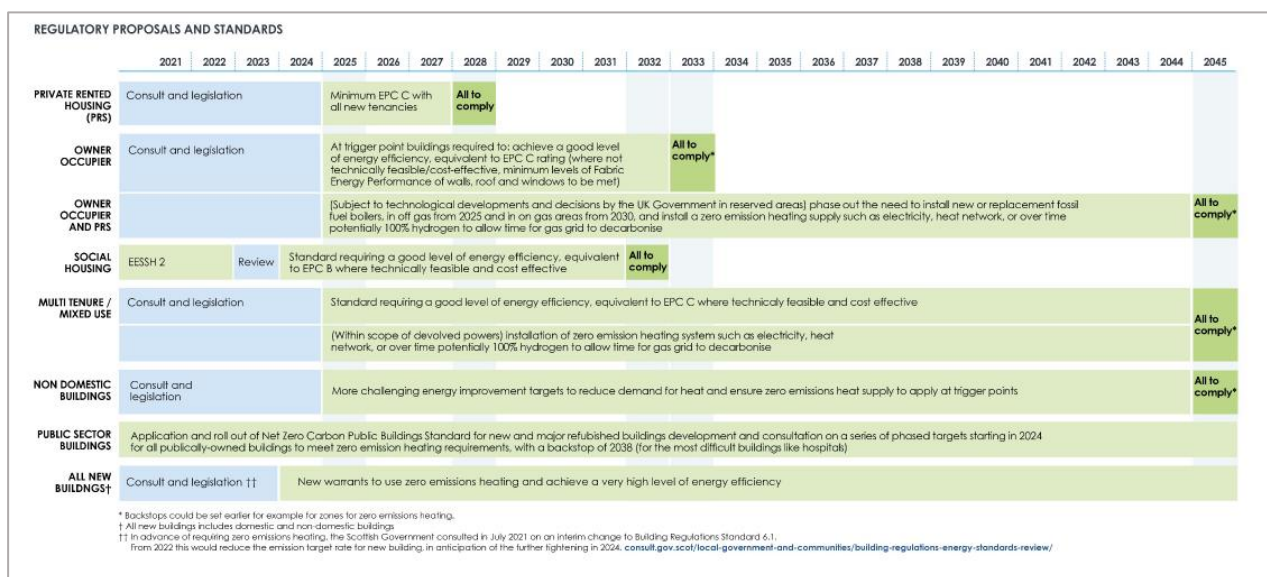


FIGURE 3 - ENERGY EFFICIENCY OF SCOTLAND’S HOMES BY EPC RATING (SOURCE SCOTTISH HOUSE CONDITION SURVEY, 2019)

6.23. To lead by example, all new homes delivered by Registered Social Landlords and local authorities will be zero emissions by 2026. This will mean accelerating the introduction of zero emissions heating systems ahead of the 2024 regulations coming into force and making greater use of offsite construction in the social rented sector to deliver high-quality and energy-efficient homes.

6.24. The following diagram illustrates the energy efficiency targets for different types of buildings between 2020-2045:



Local Development Plan 2 (LDP2)

6.25. Whilst the affordable housing policy remains unchanged for LDP2, additional criteria regarding the design of housing has been introduced, as follows:

- Developments of all tenures must provide wheelchair and accessible housing; the detail for which is included within the Design and Placemaking Supplementary Guidance. Specifically, the guidance sets a threshold that 5 - 10% of all tenures on site should be provided as wheelchair and accessible housing (however the preference is 10%).
- In the case of sites within 400m walking distance of town and village centres (including also Lenzie local centre), and where they are 10 units or more in total, a minimum of 25% of the units on site will be provided as smaller housing of no more than 2 bedrooms that are accessible without stairs (for example ground floor flats and flats with lift access).

6.26. Where homes support people’s wellbeing by being easily adaptable and with enough space to live well and there are a range of housing options available to meet different needs. This is supported by the principle that homes and the housing market are flexible to allow people to find, create or move to a home that meets their needs throughout their life.

6.27. Where homes support people’s wellbeing by being easily adaptable and with enough space to live well and there are a range of housing options available to meet different needs. This is supported by the principle that homes and the housing market are flexible to allow people to find, create or move to a home that meets their needs throughout their life.

Design & Placemaking

6.28. Good quality housing is a fundamental requirement of strong and healthy communities. Details that may seem insignificant in isolation, such as orientation; colours; shapes; heights; materials and access to public and play spaces, collectively create better development that supports our wellbeing, and should form part of the design process. All new housing developments must integrate well with their immediate environment

and seek to enhance the character of the surrounding area through their layout and design. In terms of density and layout, housing developments must:

- Align with and prepare for the '20 minute neighbourhood' principle by ensuring that the key services and facilities required by local communities are highly accessible.
- Comprise a range of house types and sizes that reflect the local context;
- Support the clustering of services, public transport and local facilities;
- Allow for the principle that houses can be extended without requiring planning permission; and
- Respect the natural topography and retain existing site levels, but without excessive retention.

Sustainability and Energy Efficiency Statement - Requirements

6.29. The purpose of this planning guidance is to support implementation of Policy 9 of the Local Development Plan 2 and may be a material consideration in decision making. Applicants for relevant development types should complete the following Sustainability and Energy Efficiency Statement (SES) form as part of their application. Exempted development types are indicated in Policy 9. The Council will advise where a form should be provided, as part of the validation process. Applicants should answer as fully as possible, to help the Council understand the impact of the proposed development on its responsibilities relating to climate change and sustainability.

6.30. The criteria set out in the tables below are intended to assist applicants prepare a Sustainability & Energy Efficiency Statement (SES) as required by Policy 9, ensuring that relevant development proposals contribute to climate change adaptation and mitigation, and the national requirement to achieve net zero carbon emissions by 2045.

Requirement	Ref	Criteria	Evidence and further details
Essential	1	Meets at least 20% of the carbon dioxide emissions reduction standard through the installation and operation of Low and Zero Carbon Generating Technologies, rising to 25% by 2025. Full details of the equipment and their location must be provided with the planning application.	To be completed by applicant
	2	Carbon emissions are minimised in accordance with the requirements of the energy hierarchy, as set out in Policy 9	
	3	The proposed site is in a sustainable location in line with Policy 11: Transport	
	4	Does not result in a net loss in biodiversity and complies with the mitigation hierarchy set out in Policy 17: Natural Environment	
	5	Protects, enhances and expands the green network and creates new green infrastructure in accordance with the requirements of Table 3 in the Green Infrastructure and Green Network Supplementary Guidance	
	6	For residential developments, homes are designed to be resilient to surface water and fluvial flooding in line with Policy 18: Water Environment and Flood Risk	

	7	Minimisation of impermeable surfaces to ensure that the development achieves greenfield run-off rates and that surface water run-off is minimised	
	8	Where a Flood Risk Assessment is required, the proposal accords with SEPA's 'Climate Change Allowances for Flood Risk Assessment in Land Use Planning' in line with Policy 18: Water Environment and Flood Risk	
	9	The proposal includes evidence that passive heating and cooling systems have been incorporated	
	10	The proposal incorporates the sustainable use of materials as outlined in criteria F-K of Policy 9.	
	11	The proposal supports the principles of the 'waste hierarchy' i.e. reduce, re-use, recycle, as outlined in Policy 20: Managing Waste. For residential proposals, includes dedicated internal storage space for recycling boxes	
	12	For major proposals, includes a waste management plan in line with Policy 20: Managing Waste	
Desirable	1	Designed to Building Standards Silver sustainability level or above.	To be completed by applicant
	2	Connects to a heat network, where available and in line with the Local Heat and Energy Efficiency Strategy.	
	3	Where LZCGT is proposed, applicants are encouraged to install shared energy networks rather than individual solutions on separate buildings.	
	4	Expands local green network habitat links, within and adjacent to the site as set out in Policy 17: Natural Environment	
	5	Provides food growing opportunities in line with Policy 13: Community Facilities	
	6	Provides facilities to compost household waste	

FIGURE 4. SUSTAINABILITY AND ENERGY STATEMENT REQUIREMENTS

Local Housing Strategy

6.31. The Local Housing Strategy sets out the strategic direction, policies and plans that will enable East Dunbartonshire Council and partners to deliver high quality housing and housing services to meet the needs of local people across all housing tenures. The LHS also sets out the important contribution that housing makes to improving health and wellbeing, creating connected and sustainable places, tackling climate change, supporting economic growth and reducing poverty across East Dunbartonshire.

LHS Priority 2: Achieving Housing Quality, Affordable Warmth and Net Zero Homes

6.32. The LHS provides the strategic framework for improving the quality and energy efficiency of homes across East Dunbartonshire, driving improvement in housing induced poverty and proactively tackling fuel poverty.

6.33. The LHS has a significant role to play in enabling East Dunbartonshire to meet the ambitious energy efficiency and climate change ambitions of the Scottish Government regarding mitigation and adaptation. It sets out

how affordable warmth can be delivered through investment in housing condition and energy improvements; and sets a road map for reducing domestic carbon emissions and building community resilience to climate change. The LHS also details the framework for improving the condition and quality of housing across all tenures, setting out the mechanisms and support to enable landlords and owners across East Dunbartonshire to invest in repair and maintenance.

6.34. Aligned to improving housing quality and tackling fuel poverty and climate change, the LHS is required to provide evidence and policy direction in relation to:

- the strategy for delivering energy efficiency standards, including the Energy Efficiency Standard for Social Housing (EESH2) and targets for private sector homes in the Heat and Buildings Strategy
- tackling fuel poverty and driving housing's contribution to achieving net zero
- creating climate ready homes to improve overall resilience to the impacts of climate change
- improving the condition of all homes through meeting housing quality and repairing standards
- supporting private owners and landlords to invest in housing repair and maintenance through the Scheme of Assistance.

6.35. Informed by analysis of the main issues and housing system drivers, LHS Priority 2 focuses on 'Achieving Housing Quality, Affordable Warmth and Net Zero Homes' in East Dunbartonshire by:

- Investment in existing homes to tackle disrepair
- Improving energy efficiency in the route to net zero
- Improving awareness of funding for repair and energy works
- Tackling fuel poverty

6.36. Chapter 6 sets out the evidence base and outlines what East Dunbartonshire Council and partners are doing to address the main challenges of improving housing conditions, energy efficiency and fuel poverty. It concludes with LHS priority actions for partnership, investment and delivery activity.

LHS Priority 2: What's our Starting Point?

6.37. Climate change is already happening, and measures must be taken to enable communities to adapt to these changing conditions, protecting themselves from damaging impacts of severe weather events. Housing is a key part of this with much of the current housing stock vulnerable to a variety of extreme weather types, for example, flooding.

6.38. Flooded properties have been experienced in East Dunbartonshire in the past and projected future climate trends indicate an increase in the frequency and geographical extent of flooding, and a consequent increase in potential damage; the required remediation action would entail significant resource implications for the Council and would also significantly impact residents e.g., via increased insurance premiums and potential displacement from homes.

6.39. Homes must also be equipped with mechanical ventilation systems to allow cooling as summers become hotter, with more frequent heatwaves being experienced.

6.40. (Further info re weather events impacts: 43 extreme rainfall and flooding events -2007-2022. That is 1/3 of all extreme weather events. All but one service has been impacted by rainfall and flooding, highlighting the extent of size and impact of this weather type.)

- 6.41. New build housing will be subject to the New Build Heat Standard (NBHS) from 2024 through the Building (Scotland) Amendment Regulations 2023. The NBHS will prohibit the use of direct emissions heating systems in new buildings applying for a building warrant from 1 April 2024 onwards. All newly installed heating systems must be zero direct emissions heating systems from this date. This will directly impact provision of all housing tenures, including affordable housing.
- 6.42. The Heat Networks (Heat Network Zones and Building Assessment Reports) (Scotland) Regulations 2023 include a heat networks Duty on local authorities. This includes identifying potential areas for Heat Network Zones (HNZs) within East Dunbartonshire and will be done through both the development of the LHEES and the production of the Heat Network Review Statement that will be produced in early 2024. The two requirements are closely linked, and work is currently being undertaken as part of the LHEES preparation to identify potential HNZs in East Dunbartonshire.
- 6.43. LHS analysis suggests that the key issues which drive the need for action, investment and partnership; to improve housing condition, energy efficiency and fuel poverty levels in East Dunbartonshire are as follows:
- 6.44. The Scottish House Condition Survey suggest that 3% of all dwellings in East Dunbartonshire are below tolerable standard, compared to the Scottish average of 2%. The level of disrepair is 10% higher than the Scottish average at 81% and 25% of dwellings are in urgent disrepair. 61% of East Dunbartonshire Council stock met the Scottish Housing Quality Standard as of 31 March 2021, compared to the Scottish average of 87%.
- 6.45. Most households in East Dunbartonshire (84%) live in private sector housing. The Scheme of Assistance offers information, advice and practical support, as well as financial assistance, for private sector households. Since 2017/18, 30 cases totalling £46k have been assisted with property grants and 45 with non-financial assistance. Despite having the highest proportion of owner occupiers, this is the lowest number of private sector households supported in Scotland.
- 6.46. 20% of households in East Dunbartonshire are estimated to be fuel poor compared to 24% in Scotland. Furthermore, 8% of households are estimated to be in extreme fuel poverty compared to 12% nationally. There is a higher prevalence of fuel poverty in older and other households compared to family homes (22%). These proportions are likely to rise due to the current energy crisis that will have a direct impact on fuel poverty. Within the social rented sector, 481 energy efficiency measures have been installed, each offering an annual fuel cost saving of £261.
- 6.47. The Scottish Government's Heat in Buildings Strategy, published on 7 October 2021, outlines a pathway to net-zero emission homes and buildings in Scotland by 2045. The Strategy includes an overarching ambition for all homes to achieve at least EPC Band C by 2033 where feasible and cost effective.
- 6.48. It is estimated that 54-60% of all East Dunbartonshire homes currently have an EPC rating of D or lower. Targets for the social housing sector are more stringent with all homes required to meet an EPC B by 2032. Currently only 3% of homes in the sector meet Band B.
- 6.49. In the social housing sector, the EESSH2 milestone (Energy Efficiency Standard for Social Housing) is that all homes in the sector will meet EPC B or, be as energy efficient as practically possible by 2032. The Scottish Government is delivering a Social Housing Net Zero fund that will assist social landlords meet some of the costs associated with this target. In addition to these energy targets, by 2030, the vast majority of homes that use high emission oil, LPG or solid fuels will have to convert to zero emission heating.
- 6.50. At the submission of 2022 Annual Return, East Dunbartonshire Council had a 15% failure rate with the EESSH 2020 milestone. It is anticipated that the failure rate will decrease due to Capital Programmes

recommencing, that will result in new energy efficient boilers being installed. Maximising funding from the Scottish Government's, Energy Efficient Scotland Area Based Schemes, to apply external wall insulation (EWI) to mixed tenure non-traditional stock, will ensure improved energy efficiency ratings, therefore increasing the stock numbers meeting EESSH.

- 6.51. The Council is developing a new strategy that will ensure all Council owned stock is compliant with the EESSH 2032 target. It is important to carefully plan this process to ensure the Council can afford this and achieve economies of scale, along with the correct measures being installed for each archetype.
- 6.52. As the majority of Council owned housing stock is within mixed tenure blocks, it is vital to ensure timely engagement with private owners, providing relevant information and access to grant funding where possible. Many private owners may not have the technical knowledge to carry out projects that will provide the required EPC improvements. East Dunbartonshire Council and other partners such as Home Energy Scotland have a key role to inform private owners of the benefits of energy efficiency.
- 6.53. A map produced by Changeworks shows the extent and distribution of cold homes across Scotland, with East Dunbartonshire showing the highest proportion of homes with an EPC rating of D or lower. Furthermore, statistics from the latest Annual Return on the Charter from the Scottish Housing Regulator show that 40% of homes in the social housing sector have a valid EPC, with just 3% meeting the EPC rating of B.
- 6.54. Housing investment and improvement programmes will require to be carefully reviewed to incorporate the costs arising from Heat in Buildings and EESSH2 targets.
- 6.55. Both homeowners and landlords are encouraged to pursue a 'fabric first' approach to housing maintenance, that maximises the performance of the components/materials that make up the building fabric, before considering the installation of energy saving products, or renewable technologies, to improve energy standards. This approach could be instrumental in making progress in improving the energy efficiency and condition of homes across East Dunbartonshire.
- 6.56. There has been a 39% reduction in the emissions from domestic energy since 2005. Renewable electricity installation will have been a contributing factor in lowering CO2 emissions. East Dunbartonshire's renewal electricity installations mostly come from PV panels.
- 6.57. The cost of all East Dunbartonshire homes meeting net zero standards is estimated at approximately £1bn or £20k per property. Some measures could increase fuel bills if cost-offsetting measures are not implemented.

LHS Priority 2: What do Residents, Partners and Stakeholders Think?

- 6.58. Informed by resident feedback and housing system analysis, partners and stakeholders came together to define the major barriers that need to be overcome in the East Dunbartonshire LHS to improve housing condition, energy efficiency and fuel poverty. Key local challenges which drive the need for future partnership, investment and delivery activity include:
 - Key issue: 84% of the homes are in the private sector and there has been limited targeted funding or financial advice services provided in recent years to encourage homeowners to improve home energy performance
 - Key issue: There is a need to improve the marketing of advice and assistance available to help homeowners improve the energy efficiency of their homes
 - Key issue: Labour and skill shortages in the construction sector are a cause for concern with questions remaining over contractor capacity to deliver energy efficiency improvements

- Key issue: The LHS should be innovative in its ambitions to improve property condition and energy performance. This means pursuing a fabric first approach to meeting energy and net zero targets
- Key issue: There is a significant volume of homes that do not meet future standards and the challenge of meeting government targets may exacerbate fuel poverty
- Key Issue: Disrepair in East Dunbartonshire is higher than Scotland. Understanding the barriers to tackling disrepair is needed so advice can educate residents on property maintenance and investment

LHS Priority 2: Our Actions

6.59. Partners and stakeholders co-produced a range of options and ideas to proactively address the challenges associated with improving housing condition and energy efficiency. The following priority actions have been identified to enable the Council and its partners to deliver LHS Priority 2 Outcomes over the next five years:

- Develop an Asset Management Strategy for East Dunbartonshire Council to identify poor performing assets (including properties in abeyance for SHQS) and consider strategic response
- East Dunbartonshire Council and partners work collaboratively to maximise the use of national funding programmes to tackle disrepair and poor energy efficiency
- Reassess capital investment plans to work towards energy efficiency and net zero targets and include retrofit of the following: energy efficiency measures, heating and ventilation systems and renewables
- Pilot Missing Shares Scheme to assist homeowners with common/mixe tenure repairs and maintenance
- Ensure that advice and information services are kept up to date so we can develop targeted and holistic information and advice services which encourage investment in the full range of energy and carbon reduction improvements in existing homes
- Through workforce planning and training, successfully resource/upskill labour for Property Maintenance Services to develop capability to achieve energy improvement standards
- Adopt joint working approaches with agencies and services to contribute to the delivery of net zero targets under the LHEES and Climate Action Plan
- Promote access to income maximisation and fuel advice services to reduce fuel and child poverty that can also provide a passport to other energy efficiency funding and assistance.

Strategic Housing Investment Plan 2023/2024 to 2028/2029

6.60. The core purpose of the SHIP is to set out strategic investment priorities for affordable housing over the five-year period 2023/24 to 2028/29 and outlines how the Council and its partners will deliver these priorities. The SHIP is supplementary to The East Dunbartonshire Local Housing Strategy (LHS) which has the core purpose of meeting the varying housing requirements of residents across East Dunbartonshire. The [forthcoming/current] LHS will cover the period from 2023 – 2028.

6.61. The SHIP is the operational outcome of the LHS and shows how the priorities identified in the LHS will be delivered in practice. The SHIP sets out how investment in affordable housing will be targeted to meet the objectives of the LHS, focussing on prioritisation and deliverability. A key objective being to increase the supply and quality of affordable housing that will enable people to successfully access suitable housing in their community and tenure of choice.

Affordable Housing Standards

- 6.62. The development of any new rented homes in East Dunbartonshire will be built to comply with the applicable Building Regulations and will include all the 'Housing for Varying Needs Standards' essential features as set out by the Scottish Government's Guidance (2022). In parallel with the council's AHIP2 Programme a Design Guide and set of Authority Construction Requirements are being developed which will provide the standards, policies and regulations that East Dunbartonshire Council expect in their new affordable housing and in any refurbishment projects.
- 6.63. All new development set out as part of the SHIP, will adhere to new core standards in relation to such aspects as automatic fire suppression systems and carbon free heating systems. The Council will also actively promote new standards, where appropriate, around home working space and balconies, in those instances where open space is not possible, and the approach is supported by Planning Policy.
- 6.64. Under the AHIP2 new construction methods will be assessed for all the sites and viability of using these will be looked at. As part of the Procurement process, we have engaged two contractors with two design teams. It is envisaged that there will be collaboration and brainstorming over efficient methods of construction practise amongst other construction issues.

Sustainable Development

- 6.65. The Council and RSLs are committed to targeting the development of sustainable, zero carbon homes where this meets the twin aims of reducing fuel poverty and carbon emissions. Delivery partners will promote sustainable design, energy efficiency measures and renewable heat and energy technologies in all new affordable homes. New development will take account of the most relevant standards and guidance, as well as the Climate Change (Scotland) Act 2009.
- 6.66. This is reflected in the LHS framework through actions and activities of 'Priority 2: Achieving housing quality, affordable warmth and net zero homes.' The key actions and commitments by local partners for LHS Priority 2 seek to address and eradicate fuel poverty.
- 6.67. The Council's own Affordable Housing Investment Programme (AHIP2) will be designed to achieve, as a minimum, Scottish Building Standards Gold Level Aspects 1 and 2 Sustainability. The Council would also like to improve on this standard to Passivhaus level where viable. In relation to this the Council are also assessing the space standards as part of the new build programme. This work will be informed by the:
- Local Housing Strategy (LHS),
 - Climate Action Plan (CAP)
 - Local Heat and Energy Efficiency Strategy (LHEES)
 - Testing of options through the market as part of Affordable Housing Investment Programme 2.

Design & Placemaking

- 6.68. The Scottish Government's design policy is set out in Designing Streets and Creating Places. The Council implements the principles set out in these documents through its own policy, Design and Placemaking (see above), which promotes distinctive, safe and pleasant, easy to move around, welcoming, adaptable, and resource efficient places. The Council is committed to delivering on this policy in their affordable housing developments.

20-Minute Neighbourhoods

- 6.69. The Scottish Government has committed to the concept of 20-minute neighbourhoods through the Programme for Government and National Planning Framework 4. 20-minute neighbourhoods are based on the concept of 'local living' by giving people the ability to meet most of their daily needs within a 20 minute

walk, and by accessing safe active travel and public transport options. They aim to create communities that are vibrant, diverse, sustainable and supportive of healthy living. Action 1.3 in the LHS 2023 states that housing should 'support the delivery of 20-minute neighbourhoods by considering the potential for placemaking throughout the design and development of new build housing and existing stock'.

Gypsy Travellers

- 6.70. The refreshed LHS Guidance of September 2019 indicates that the needs of Gypsy/Travellers are identified, understood and addressed with a requirement for local authorities to evidence recent engagement with Gypsy/Traveller communities in better understanding their needs. The LHS Guidance says that engaging directly with Gypsy/Travellers timeously on unauthorised encampments is a better way to understand their needs. Engagement over a period may be the most effective way of building up a clear picture of local need because of travel patterns
- 6.71. A ministerial working group and Gypsy/Traveller Action Plan was established in December 2017 and links to wider ambitions set out in the National Performance Framework to create a fairer Scotland and stronger and cohesive communities. The life of the Plan was extended due to the COVID-19 pandemic until October 2022. Housing to 2040 the new National vision for housing in Scotland aims to embed the needs of the Gypsy/Traveller community in housing and planning policy. Through their More Homes Scotland Approach, the Scottish Government introduced the Gypsy/Traveller Accommodation Fund that sits alongside the Affordable Housing Supply Programme (AHSP) and will support local authorities in delivering quality homes (but not houses) to Gypsy/Travellers.
- 6.72. There is currently no known demand from the Gypsy Traveller community and as such no existing public (or private) provision of sites for Gypsy/Travellers in East Dunbartonshire. Eight discreet sites were used for unauthorised encampments with an average of three encampments per annum from 2014 to 2019.
- 6.73. Scotland's fourth National Planning Framework (NPF4) includes policies on the accommodation needs of Gypsy/Travellers and is consistent with the principles of 20-minute neighbourhoods. The Council's new Local Housing Strategy 2023-2028 also to be adopted later this year, sets out actions within LHS Priority 3 'Supporting People to live independently and well at home' that aim to improve outcomes for Gypsy/Travellers through ongoing engagement and dialogue.
- 6.74. The Council had begun a process of engagement with an extended family group during 2020/21 to ascertain need and demand for the existing unused site at Primrose Way, Lennoxton. An application was made to the Scottish Government's Gypsy Traveller Accommodation Fund to support the redevelopment of this site, with the support of the group identifying how the site should be developed to meet their needs and lifestyle. This was approved with an unallocated funding commitment put in place, as it was felt that projected figures within the application were not realistic. During the period when a feasibility study was being procured this wider family group settled elsewhere. The Council continues to liaise with a neighbouring local authority to identify any movements that might exist between council areas that could be identified as housing need.

Wheelchair Accessible Housing

- 6.75. The Council is committed to the delivery of wheelchair accessible homes in all new residential developments provided through the Strategic Housing Investment Plan. The Council's Design and Placemaking Supplementary Planning guidance advises that 5-10% of any new build development should be wheelchair and accessible housing. In most cases it is expected that the number of wheelchair and accessible dwellings will be or exceed 10%. The Housing Service targets this across the SHIP programme, tailoring the balance on each site to context and to local needs. The Council's own Housing programme targets 10% of homes as being wheelchair and accessible housing with other forms of amenity housing in addition to this.

- 6.76. The LDP2 contains an all-tenure target to underpin and extend the requirements across the private and RSL sectors. The Plan proposes the need to provide a minimum of 5- 10% of the total units for each tenure type as wheelchair and accessible housing.
- 6.77. Additionally, as part of the Council new build programme, a number of developments will include housing for the ambulant disabled, particularly older people. This term embraces a wide group of people with a range of mobility problems or lack of agility and strength, but whose physical disability permits them to walk with or without the use of walking aids. The design need is for a home that is easy to move around with a walking frame or sticks or crutches, has a bathroom that can be adapted to their needs and fittings / service controls that are within reach and easy to use.

Housing for Older People

- 6.78. In 2019 the Council commissioned research together with the Health and Social Care Partnership (HSCP) in relation to Older People and Specialist Housing in East Dunbartonshire. The research which was conducted with a face-to-face sample of 500 residents indicates that around 41% of older people in East Dunbartonshire have a life limiting condition or disability. Of this overall group:
- 7% have health needs requiring aids and adaptations, which can be met through 'in situ' solutions or in new mainstream new build developments
 - 10% have physical frailties which mean they are unable to get up and down stairs
 - 5% are unable to easily access their own property due to the presence of steps. This category has a need for dedicated wheelchair options.
- 6.79. There is a requirement to ensure that all suitably accessible housing is provided for those most in need of it. As such, the Council has a set a target of at least 10% of properties to be wheelchair and accessible housing, the target for which is aligned with that proposed in the LDP2.
- 6.80. The Local Housing Strategy 2023-28 priority 3 aim is 'Supporting people to live independently and well at home'. As part of the outcomes and actions for this priority the Council will further review the wheelchair space standards in order to determine if the Housing for Varying Needs designs are sufficient to meet the needs of older people and other specialist needs groups. This is being considered as part of the Authority Construction Requirements and Design Guide for the AHIP2 and as part of the AHIP2 pre-construction work. This will inform the Standard House Types which will be adopted for the programme.
- 6.81. It is anticipated that there will be approximately 100 wheelchair accessible homes for affordable housing during the next five years. Additionally, private sector developers will need to adhere to the requirement in the approved LDP2 Proposal. The design of wheelchair housing will, as a minimum, meet requirements as outlined in Section 3 of the wheelchair accessible Housing Guidance. It is expected that around £15.5m will be invested in wheelchair accessible housing throughout the SHIP period.

Glossary

Term	Description
HLA	The annual HLA monitors the delivery of housing land including past completions and future programming. It will inform the pipeline and actions to be taken in the Delivery Programme.
HNDA	The Housing Need and Demand Assessment (HNDA) tool calculates housing need and in doing so gives practitioners more time to consider which scenarios to run in the tool and what the findings mean for the LHS and Local Development Plan. The tool enables local authorities to develop long-term strategic views of housing need and demand based on nationally produced data sets.
HST	The Housing Supply Target (HST) is a policy view of the number of homes the Council has agreed will be delivered over the period of the LDP and Local Housing Strategy.
LHS	Local Housing Strategies were introduced as part of the Housing (Scotland) Act 2001 to widen the strategic and enabling role for local authorities in relation to housing in their area. The Local Housing Strategy (LHS) sets out the outcomes the Council and its partners want to achieve, and the actions they will take, to address housing need and demand in their area.
LHLR	The amount of land required for housing, as identified by the local development plan. The Local Housing Land Requirement (LHLR) is expected to exceed the 10-year Minimum All-Tenure Housing Land Requirement (MATHLR) set out in the National Planning Framework.
MATHLR	There is a statutory requirement for the National Planning Framework to contain targets for the use of land in different areas of Scotland for housing. To meet this, the National Planning Framework includes a Minimum All –Tenure Housing Land Requirement (MATHLR) for each planning authority in Scotland. The MATHLR is the minimum amount of land, by reference to the number of housing units, that is to be provided by each planning authority in Scotland for a 10-year period, as set out in Annex E of NPF4. The MATHLR is expected to be exceeded in the local development plans LHLR.
SHIP	The Strategic Housing Investment Plan is a five-year rolling Plan that links the strategic priorities identified in the Council’s Local Housing Strategy (LHS) to the delivery of additional affordable housing. The purpose of the SHIP is to guide the allocation of available Scottish Government investment funding to meet the affordable HST, as set out in the LHS and its associated priorities and outcomes.

Appendices

Appendix 1: Housing Need and Demand Assessment 3 (HNDA3)

Glasgow and the Clyde Valley Housing Need and Demand Assessment 3 (HNDA3) 2024

The preparation of the HNDA has been undertaken according to the following steps. These are detailed as follows:

HNDA Tool Steps			
Step	Description	Summary	EDC Output
Step 1	Household Projections	The HNDA Tool was pre-populated with the low, principal and high variants of the National Records of Scotland 2018-based household projections, it being concluded that no other projections were robust of up to date. NRS 2020-based national household projections were not available at local authority level. Projections for Inverclyde and West Dunbartonshire suggested a decline in households. The tool was therefore amended to replace any NRS projected decline with a replication of the previous year's figure. This was applied to each of the variants to ensure that they do not have annual decline in households at any point.	~2300
Step 2	Existing Need	the HNDA Tool includes default assumptions for existing need using the homelessness households in temporary accommodation and households that are both overcrowded and concealed (HoTOC) method. While other measures of existing need were considered including a survey undertaken by Diffley on behalf of Homes for Scotland that identified a wider range of housing demand, it did not identify the net need for additional homes required by the tool, and it was therefore considered that it would be better suited to appraisal as part of assessments beyond the HNDA.	245
Step 3	Income, Growth & Distribution	It was considered that the HNDA Tool should model the 'prevailing state of the Housing Market and economy', as described by the CHMA, while acknowledging that much of the more recent evidence suggests that lower migration and higher mortality are likely to be in effect (short term) than that anticipated by the NRS in their preparation of the 2018-based projections or by the CHMA in their formulation of the HNDA tool.	<i>Factored into overall output</i>
Step 4	Prices & Affordability		
Step 5	Split Need into Tenure	Between 850 and 1000 social rented homes will be needed over the period in East Dunbartonshire.	850 – 1000 SR. 1350 – 1450 MKT.
Final	Estimate(s)	Additional future housing need and demand ranges from 4152 to 4642 homes (~220 to 245 homes per year).	~2200 - 2450

Further details on HNDA3 can be found within the [Glasgow & Clyde Valley Housing Need & Demand Assessment \(HNDA3\)](#) document on the Clydeplan website.

Appendix 2: Minimum All-Tenure Housing Land Requirement (MATHLR)

As part of the Draft National Planning Framework (NPF4) consultation exercise which encompassed all planning authorities in Scotland, the Scottish Government (SG) Centre for Housing Market Analysis (CHMA) presented to East Dunbartonshire Council in early 2021 an initial default MATHLR estimate of **3200** dwellings to be allocated during the 10-year LDP3 period (see 2A).

2A. Initial Default Estimate

Initial Default Estimate						
Existing Need		Households		Flexibility %	Flexibility Amount	TOTAL
~250		~2300		25%	~650	
Homeless households in temporary accommodation and households both overcrowded and concealed	+	Newly forming households derived from NRS 2018-based household projections (principal projection)	+	Flexibility applied to provide a contingency of land to account for potential deliverability issues and/or sites not coming forward as expected	=	3200

The Glasgow City Region (GCR) Housing Market Partnership (HMP), of which the East Dunbartonshire planning authority is a member, has long maintained that applying a blanket flexibility allowance or generosity to housing targets undermines the city region objectives of delivering a compact city model that prioritises the development of brownfield land. The initial response to the SG from the GCR HMP in June 2021 therefore requested that the flexibility allowance was removed. This was on the basis that that the over-allocation of land in highly marketable locations like East Dunbartonshire, combined with the mobility of buyers in the housing market area, could undermine the spatial strategies of LDPs and the GCR, and that there is no evidence that additional flexibility in the provision of land would assist in the delivery of new homes in those areas where there may be perceived market failures. This amendment would have reduced the proposed MATHLR figure for East Dunbartonshire to **2550** dwellings (see 2B).

2B. June 2021 Proposal

Initial Default Estimate				
Existing Need		Households		TOTAL
~250		~2300		
Homeless households in temporary accommodation and households both overcrowded and concealed	+	Newly forming households derived from NRS 2018-based household projections (principal projection)	=	2550

In September 2021 a further response was provided to the CHMA in which the HMP reiterated its concerns regarding the use of a blanket flexibility but accepted that the CHMA/SG final position was that the application of a flexibility allowance would be required for each local MATHLR figure. The response by the HMA nevertheless identified that East Dunbartonshire is affected to a significant degree by mobility within the housing market. This was determined through the identification of patterns of moves using housing sales data for the period 2013 to 2017 as set out in information held by the HMP. The degree of market self-containment within the Strathkelvin and Glasgow

North-East (SGNE) and Greater Glasgow North-West (GGNW) Sub-Market Housing Areas within which East Dunbartonshire is located was assessed to be 63% and 67% respectively, less than other parts of the city region. It was considered that such mobile demand in the area that could be reallocated to elsewhere in the housing market area, so as to support the city region objective of prioritising the development of brownfield land. This reduced the initial estimate by around 550 dwellings. This suggestion was ultimately accepted and the proposed MATHLR of **2500** dwellings was adopted by the SG in the preparation of the draft NPF (see 2C).

2C. September 2021 Proposal & NPF4 MATHLR

September 2021 Proposal & NPF4 MATHLR								
Existing Need		Households		Mobile Demand		Flexi. %	Flex. No.	MATHLR
~250		~2300		~550		25%	~500	
Homeless households in temporary accommodation and households both overcrowded and concealed	+	Newly forming households derived from NRS 2018-based household projections (principal projection)	-	To account for mobile demand in the area that could be reallocated to elsewhere in the city region	+	To provide a contingency of land to account for potential deliverability issues and/or sites not coming forward as expected		= 2500

The final version of NPF4 was adopted in February 2023 following approval by the Scottish Parliament. Consequently, the MATHLR of 2500 dwellings as set out in NPF4 represents the final agreed and adopted minimum capacity of housing land that must be allocated in East Dunbartonshire LDP3. There is no longer any opportunity to further amend the MATHLR.

For clarity, the process from initial default estimate to adopted MATHLR is set out as follows (see 2D):

2D. MATHLR Determination Process

MATHLR Determination Process						
Initial Default Estimate		June 2021 Proposal		September 2021 Proposal		NPF4 MATHLR (Feb 2023)
3200		2550		2500		
Existing need + newly forming households + 25% flexibility	>	Existing need + newly forming households (no flexibility)	>	Existing need + newly forming households - mobile demand + 25% flexibility	>	2500

Appendix 3: Local Housing Land Requirement (LHLR) Options

Work to establish a LHLR for LDP3 began during spring 2024. The potential options (all figures rounded) in establishing an LHLR are set out as follows:

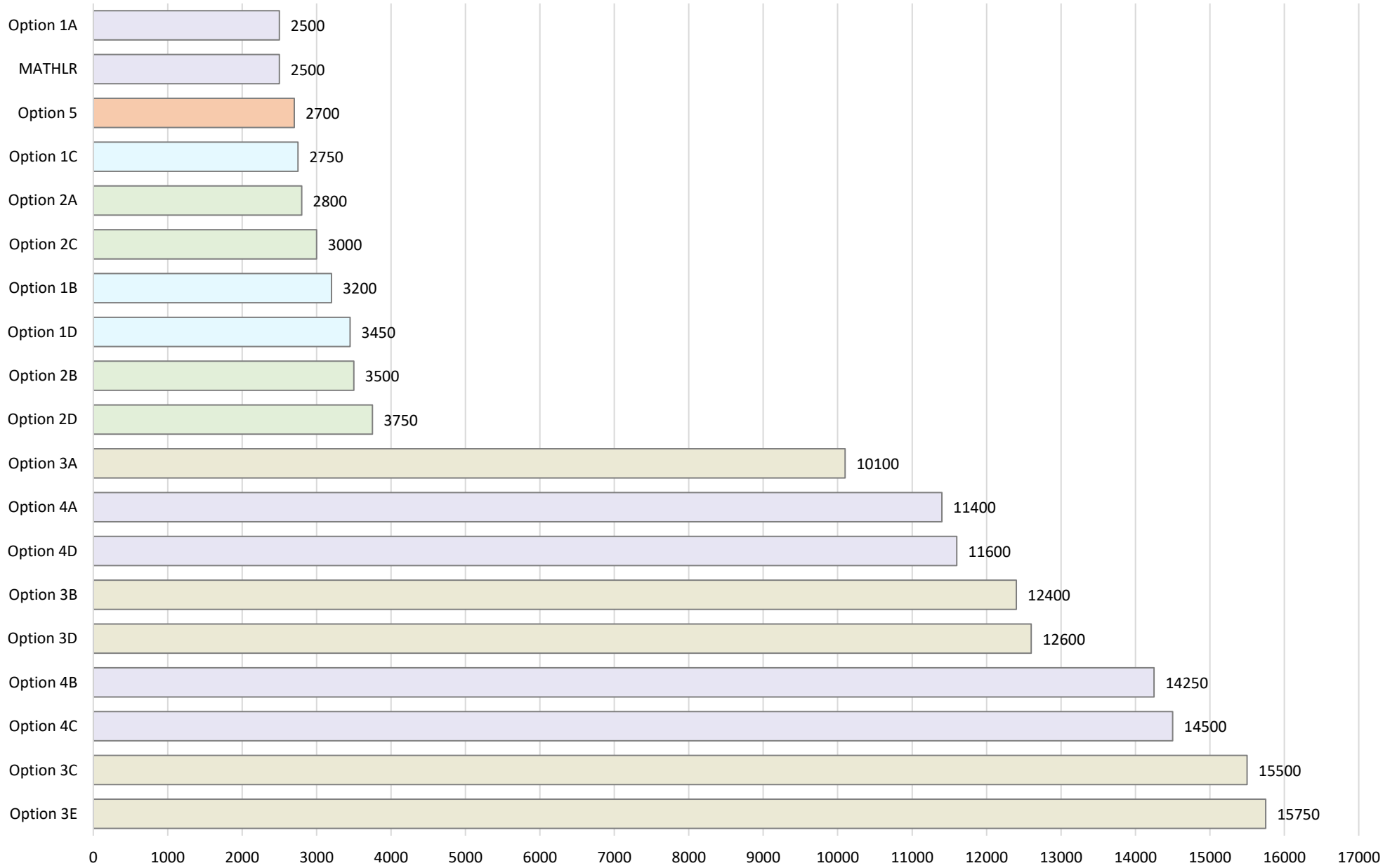
Option	No.	Details
Add flexibility and/or the high migration household growth scenario to the HNDA tool Stage 1 & 2 outputs	1A	The total backlog (homeless existing need plus overcrowded and concealed) for East Dunbartonshire as set out in HNDA3 is 245 dwellings. This figure is identical to that set out using the CHMA calculator for the MATHLR figure. With no flexibility applied and 2317 newly forming households, the initial default estimate would remain at 2500 units.
	1B	Adding an additional 25% flexibility allowance to 2500 as set out above would increase the figure to a potential LHLR of 3200 units.
	1C	The 2022 to 2037 principal scenario indicates that 3476 new households would be formed. The 2022 to 2037 high migration scenario indicates that 3772 new households would be formed. The change to the figures using the CHMA calculator, with Option 1A intact and without flexibility would produce a MATHLR and potential LHLR of 2750 units.
	1D	Adding a 25% flexibility to 2750 as set out above would increase the figure to a potential LHLR of 3450 units.
Apply households that are homeless and both overcrowded and include at least one concealed household as identified in the HFS Report (500) and add flexibility and/or the principal or high migration scenario	2A	Applying the households that are homeless and both overcrowded and include at least one concealed household (single people included) figure from the Homes for Scotland Report (see Appendix 6) with the principal household projection (using Stages 1 and 2 of the HNDA process) would produce a figure of 2800 without 25% flexibility.
	2B	Adding a 25% flexibility to 2800 as set out above would increase the figure to a potential LHLR of 3500 units.
	2C	Applying the households that are homeless and both overcrowded and include at least one concealed household figure (single people included) from the Homes for Scotland Report (see Appendix 6) with the high migration household projection (using Stages 1 and 2 of the HNDA process) would produce a figure of 3000 without 25% flexibility.
	2D	Adding a 25% flexibility to 3000 as set out above would increase the figure to a potential LHLR of 3750 units.
Apply the overall existing need figure set out in the HFS Report and proffered and endorsed by HFS and its members	3A	The Existing Housing Need in East Dunbartonshire document from Homes for Scotland indicates that a LHLR of 10100 units would be required of which 6600 would comprise affordable housing and 3500 a market housing solution.
	3B	The addition of the above figure of 10100 units, 2317 newly arising households over ten years (the principal projection) and no flexibility would produce a LHLR of 12400 units.
	3C	The addition of the above figure of 10100 units, 2317 newly arising households over ten years (the principal projection) and a 25% flexibility would produce a LHLR of 15500 units.
	3D	The addition of the above figure of 10100 units, 2515 newly arising households over ten years (high migration scenario) and no flexibility would produce a LHLR of 12600 units.

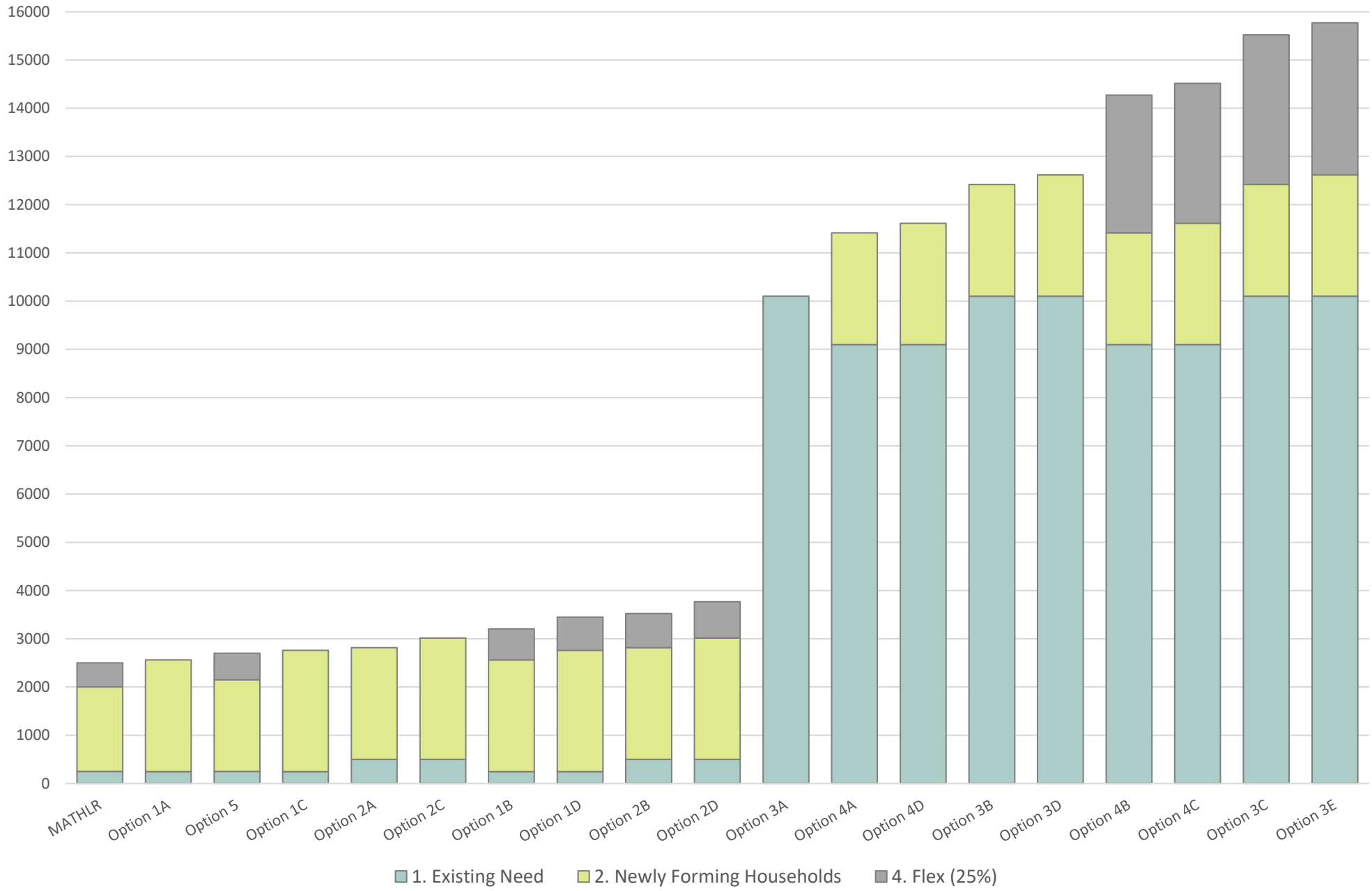
	3E	The addition of the above figure of 10100 units, 2515 newly arising households over ten years (high migration scenario) and a 25% flexibility would produce a LHLR of 15750 units.
Apply the figure submitted by Taylor Wimpey, derived from the HFS report and proffered and endorsed by HFS and its members.	4A	The submission to the ER and I-LHLR consultation by TW/HFS proposed a LHLR of 14271 dwellings, comprising an unmet existing need tally of 9100 units, 2317 newly arising households over ten years. With no flexibility, the LHLR would be 11400 units.
	4B	Adding a 25% flexibility to 11400 as set out in the submission would increase the figure to a potential LHLR of 14250 units (as submitted).
	4C	With an unmet existing need tally of 9100 units and using the 2515 (high migration scenario), the LHLR would be 11600 units.
	4D	Adding a 25% flexibility to 11600 as set out in the submission would increase the figure to a potential LHLR of 14500 units.
Add high migration to the MATHLR calculation	5	Employing the same steps taken to produce the MATHLR for East Dunbartonshire (see Appendix 2), with the high migration variant and mobile demand (approx. 20% reduction of anticipated household growth) applied, would produce a potential LHLR of 2700 units.

The potential LHLR options are summarised as follows:

1A	5	1C	2A	2C	1B	1D	1D	2D	3A	4A	4D	3B	3D	4B	4C	3C	3E
2500	2700	2750	2800	3000	3200	3450	3500	3750	10100	11400	11600	12400	12600	14250	14500	15500	15750
0%	+8%	+10%	+12%	+20%	+28%	+38%	+40%	+50%	+304%	+356%	+364%	+396%	+404%	+470%	+480%	+520%	+530%
100ha*	108ha	110ha	112ha	120ha	128ha	138ha	140ha	150ha	404ha	456ha	464ha	496ha	504ha	570ha	580ha	620ha	630ha
50ha*	54ha	55ha	56ha	60ha	64ha	69ha	70ha	75ha	202ha	228ha	232ha	248ha	252ha	285ha	290ha	310ha	315ha

* AREA REQUIRED AT A RATE OF 25 OR 50 DWELLINGS PER HECTARE (HA)





Key Factors in Setting the LHLR

With the above potential figures considered, a number of key factors have been taken into account when setting the LHLR for East Dunbartonshire.

Additional Existing Need

No further local research or additional evidence to establish existing need is available to inform the establishment of the LHLR. As noted in [Appendix 6](#), whilst the research undertaken by Homes for Scotland provides an interesting means of understanding the broader desire for residential accommodation, it is concluded that the HNDA process undertaken by the CHMA and HMP is robust and credible in establishing true need and demand. Any further uplift from the MATHLR is explored under the various options within this Appendix.

Availability of Land for Housing

The past rate of completions (see [Appendix 4](#)) and allocated supply in LDP1 and LDP2 (see [Appendix 5](#)) must be seen within the context of a wider availability of housing land during previous plan periods, where high rates of house completions were to a large degree driven by the spatial strategy of those plans and development of brownfield sites, including the former Woodilee and Lenzie Hospitals and at former school sites. The exceptionally high rate of development achieved during the Local Plan 2 and Local Development Plan 1 periods through the successful reduction in brownfield land and rationalisation of public assets is unlikely to be capable of continuation due to land, infrastructure and environmental constraints.

Given the above factors, it is likely that a degree of greenfield land release within the Green Belt would be necessary so as to at least achieve the MATHLR. Because of the principles discussed in [Appendix 2](#) concerning the City Region's spatial strategy and direction of development towards brownfield land, and because development of greenfield land is generally considered a less satisfactory approach to development for reasons of infrastructure use, local living, sustainability and biodiversity, the extent to which the LHLR exceeds the MATHLR must be carefully considered. It is therefore likely that the availability of land to allocate in LDP3 will be significantly more constrained than was the case during previous plan periods. [Appendix 9](#) sets out comments raised by members of the public during the LDP3 Evidence Report engagement, many of which refer to the aforementioned constraints.

Long Term Reoccupation of Empty Dwellings, Second Homes and Housing Used for Short-Term Letting (Ineffective Stock)

[Scottish Government statistics](#) estimate that there were 317 long term empty properties in East Dunbartonshire in 2023 and an average of 195 per year during the years 2014 to 2023. It is therefore considered that the setting of the LHLR can take this existing supply into account, albeit with the caveat that the quality, location and desirability of those properties is difficult to ascertain. For example, a LHLR of 2700 units could assuming the reoccupation of those homes be augmented by several hundred existing units, to achieve an undefined actual supply during the plan period of around 3000 units. It is suggested in the HFS paper ([Appendix 6](#)) that this approach could be taken. A further 61 dwellings averaging at 100 during the 2014 to 2023 time period were classified as being second homes, presenting potential additional supply above the empty home tally. [Scottish Government statistics](#) short term let accommodation indicate that 51 applications had been received up to the end of June 2024. This may also provide a potential supply of homes, should the owners of the properties in question wish to market them for sale or rent. Nevertheless, because it is difficult to be certain of the extent to which homes may be reoccupied permanently and whether some could subsequently be removed from the overall supply through, for example, demolition, it is

not considered appropriate to factor any such number into the LHLR itself, but rather to view empty homes or those being let on a short-term basis as a potential additional surplus – see [Appendix 7](#).

Court of Session Decision

The 03/05/2024 decision of the Court of Session on ref. [\[2023\] CSIH 11 XA41/23](#) on Miller Homes Ltd v The Scottish Ministers states that the ‘LHLR is expected to exceed the MATHLR. It is not however a requirement of the development plan that the LHLR exceed the MATHLR.’ Given the decision of the Court of Session that there is no absolute requirement to do so, it is stressed that any uplift from the MATHLR would be desirable given NPF4 stipulations, but not essential. The degree of any uplift should be understood in this context.

Selection of LHLR & Explanatory Summary

The following table compares existing need as established through the MATHLR preparation process against each variant of the NRS 2018-based Household Projections.

Existing Need & Household Projections					
Household Projection	Existing Need		Households		TOTAL
Low Migration Variant	~250	+	~2100	=	2350
Principal Projection	~250		~2250		2500
High Migration Variant	~250		~2500		2750
Explanation	Homeless households in temporary accommodation and households both overcrowded and concealed		Newly forming households derived from NRS 2018-based household projections		Existing need plus household projections

The MATHLR employs the Principal Projection because the NRS states that the projection ‘is based on the set of assumptions (they) think are most likely to occur.’ The High Migration Scenario assumes a higher level of inward migration to Scotland than the Principal Projection and the Low Migration Variant a correspondingly lower expectation. It can be seen that the Low Migration Variant (without flexibility) would be insufficient to exceed the 2500-unit MATHLR itself. The Principal Projection is identical to the MATHLR as set out in NPF4 and is consequently also unsuitable as an LHLR for LDP3. Because of the circumstances set out in the Key Factors section above, any setting of the LHLR must be reasonable and within the bounds of what could realistically and sustainably be delivered during the plan period.

The High Migration Variant projects an increase in households during the ten-year period equivalent to around 2500 dwellings and varies from the Principal Projection by approximately 250 units overall. The determination of the MATHLR (see [Appendix 2](#)) employed an approach whereby mobile demand was factored into the process, resulting in a reduction of around 550 units. On the basis that mobile demand should again be factored in so as to achieve consistency with the previous process, approximately 600 units would instead be subtracted. With flexibility added as with the MATHLR, an LHLR of 2700 units would be produced. This corresponds to Option 5 as set out in the Options section above.

Indicative LHLR								
Existing Need		Households		Mobile Demand		Flexi. %	Flex. No.	I-LHLR
~250		~2500		~600		25%	~550	
Homeless households in temporary accommodation and households both overcrowded and concealed	+	Newly forming households derived from NRS 2018-based household projections (high migration variant)	-	To account for mobile demand in the area that could be reallocated to elsewhere in the city region. An approx. 20% reduction.	+	To provide a contingency of land to account for potential deliverability issues and/or sites not coming forward as expected		= 2700

It is considered that the LHLR for LDP3 should be 2700 units for the following reasons:

1. The process taken to establish the figure employs the same method used to determine the MATHLR and agreed by the CHMA. See [Appendix 2](#).
2. No further existing need can be established that would exceed the tally set out in the MATHLR. HNDA3 has obtained 'robust and credible' status, and it also establishes an existing need figure of 245 units. The existing need estimates established in the Homes for Scotland paper are not considered robust because they are based on a survey and methodology inconsistent with recognised HNDA guidance. Further commentary on the paper is set out in [Appendix 6](#).
3. Employment of the High Migration Scenario provides an additional buffer of land above the MATHLR to accommodate any unexpected increase in inward migration as estimated by the NRS. Should this occur, enough land would be set aside to allow for additional housebuilding above the MATHLR. Should it not occur, as is more likely according to 2018-based estimates, land to accommodate 200 additional units would provide flexibility should any issues arise with land allocated to meet the MATHLR, with the proviso that all sites allocated are considered effective subject to developer intentions.
4. The proposed LHLR complies with the expectation in NPF4 that the 2500-unit MATHLR should be exceeded.
5. The proposed LHLR of 270 dwellings per annum is higher than the 245 dwellings per annum Housing Supply Target (HST) set out in the Local Housing Strategy (see para. 2.5).

Given the constraints to which the authority is subject and the anticipated requirement to release green belt land as discussed, it is considered that an LHLR of **2700** units would be locally ambitious in exceeding the MATHLR and would provide additional flexibility. Delivery of homes is largely within the control of the development industry, all allocated sites capable of being affective as confirmed during the LDP's examination. As discussed in [Appendix 6](#), the Homes for Scotland report sets out methods that seek to establish a higher existing need than the HNDA process. However, these are not considered to reflect true need. In this regard, it must be noted that NPF4 Policy 16 states that 'where sites earlier in the deliverable housing land pipeline are not delivering as programmed, and alternative delivery mechanisms identified in the delivery programme are not practical, measures should be considered to enable earlier delivery of long-term deliverable sites (7-10 years) or areas identified for new homes beyond 10 years'. Whilst it is not the purpose of the Evidence Report to discuss site-specific matters, an approach may be taken when allocating sites as part of the preparation of the LDP3 Proposed Plan to indicate future growth areas or sites to be released should the pipeline of sites be fully completed prior to the end of the plan period. Therefore, should the delivery of homes exceed expectations, there is a mechanism in place to allow for further delivery beyond the LHLR.

Consultation on Preferred I-LHLR

Various options to establish the LHLR were explored and discussed with relevant stakeholders during a series of Topic Groups that were held in summer/autumn 2024 to inform the preparation of the LDP3 Evidence Report. Following this process, consultation on a preferred I-LHLR of 2,700 dwellings was undertaken between 04 November 2024 and 13 December 2024. Consultation on the broader Housing Technical Paper was also undertaken, including the sections on housing land supply, the glossary and appendices. 21 responses were received, of which 5 selected the preferred I-LHLR, 4 proposed a lower I-LHLR and 7 proposed a higher I-LHLR. These preferences are broken down as follows:

Proposed I-LHLR	Position	Number of Selections
100	Lower than preferred I-LHLR	1
2500	Lower than preferred I-LHLR	3
2700	Preferred I-LHLR	5
10100	Higher than preferred I-LHLR	6
14500	Higher than preferred I-LHLR	1

TABLE 5. NOTE THAT SOME RESPONSES DID NOT PROPOSE OR SELECT A FIGURE.

EDC Response to Consultation Representations

The following section provides a summary and analysis of comments made during the consultation process, including what was set out in representations and the Council's response. Please note that the representations and the analysis of the representations encompasses the consideration of housing land supply and of housing quality as set out in [Part 2](#) of this technical paper.

Housing Technical Paper Consultation Responses
Summary of Representations
<p><u>Support for Preferred I-LHLR</u></p> <p>Lenzie Community Development Trust and four individuals support the preferred I-LHLR of 2700 dwellings as set out in the consultation materials.</p> <p><u>Alternative I-LHLR – Lower</u></p> <p>Various alternative I-LHLR figures have been proposed. One participant prefers a 100 I-LHLR but has not provided supporting explanation on why the specific number is considered preferable. Two other participants prefer a 2500 I-LHLR but have provided no supporting explanation on why the specific number is considered preferable. Love Dougalston prefer a 2500 I-LHLR because it corresponds to the MATHLR for East Dunbartonshire as set out in NPF4. They state that the MATHLR and I-LHLR are overly reliant on inward migration (and therefore household growth) and that adding a 25% generosity comprises double counting.</p>

Alternative I-LHLR – Higher

Mactaggart and Mickel Homes Ltd, Homes for Scotland, Cala Homes (West) Ltd, Gladman Developments Ltd, Persimmon Homes and BDW (Trading) Ltd prefer a I-LHLR of 10100 as per the Homes for Scotland research on Existing Housing Need and Demand within East Dunbartonshire (the Diffley Report). The proposed I-LHLR would comprise 6600 affordable homes and 3500 market homes. Homes for Scotland notes that the Diffley Report identifies that there are 15100 households in East Dunbartonshire with unmet housing needs and that when accounting for those who can make in-situ repairs, this reduces the overall need figure to around 10100 households

Taylor Wimpey proposes an alternative LHLR of 14500 dwellings, noting that options 4A to 4D of this Technical Paper set out their preferred scenario. This figure would comprise an unmet existing need of 9,100 units in EDC, the high migration scenario of 2515 newly arising households over ten years, plus 25% flexibility.

Cala Homes (West) Ltd have expressed concern that the Council (EDC) does not consider the findings of the Diffley Report to be accurate and alongside Homes for Scotland state that the Diffley Report used more recent, primary data than the HNDA, and that consequently, they consider it to be more robust. Gladman Developments Ltd also consider the findings of the Diffley Report to be robust and maintain that a higher I-LHLR figure than proposed should be set. They state that the I-LHLR should significantly exceed to the current proposed figure but note that an alternative figure may not have to be as high as the one set out in the Diffley Report.

Cala Homes (West) Ltd have expressed concern that the draft Technical Paper states that there is 'no absolute requirement' for the LHLR to exceed the MATHLR and note that the expectation in NPF4 is that the LHLR should exceed the MATHLR to encourage the delivery of high quality, affordable and sustainable homes. Cala Homes and Homes for Scotland highlight that the Local Development Plan Guidance (2023) states that relevant evidence considered once a robust HNDA has been achieved must be included in the Evidence Report, and that they would consequently dispute any approach to setting an I-LHLR which does not take into consideration the guidance within NPF4 Policy 16, or the evidence set out in the Diffley Report. Homes for Scotland and Persimmon Homes would also dispute any approach to setting the I-LHLR that does not consider the data within the Diffley Report. Persimmon Homes refer to the statement in the draft Technical Paper regarding an 'absolute requirement' but note that whilst the LDP Guidance 'may not legally be enforced' compliance would show EDC's commitment to NPF4 and addressing the national housing emergency declared by the Scottish Government.

Cala Homes (West) Ltd, Persimmon Homes and Taylor Wimpey consider that in setting an I-LHLR of 2700 dwellings for the ten-year LDP3 period, EDC is being reserved in terms of housing delivery and that it is necessary for the Council to be more ambitious to ensure that issues of supply, affordability, availability, accessibility and quality are not exacerbated. They also state that whilst they acknowledge that EDC has limited funds to support the delivery of the infrastructure necessary to allow for the development of 10100 homes, that Cala Homes (West) Ltd. and Persimmon Homes can support any implementation through developer contributions. Cala and Persimmon note that they have several sites in East Dunbartonshire and that they therefore have an interest in setting the I-LHLR.

Taylor Wimpey notes that the proposed I-LHLR of 2700 units is lower than the initial default MATHLR estimate of 3200 dwellings and that it is lower than the 3678 units completed between 2010 and 2019.

Household Needs

Persimmon Homes disagree with the statement in [Appendix 6](#) of this Technical Paper that ‘many individuals in the (Diffley Report’s) household need figure are adequately accommodated with a wish rather than a need for alternative premises’, because unlike the Diffley Report, the methodology used to generate the proposed I-LHLR does not account for single adults living with parents or sharing a flat and families in homes with inadequate bedroom space.

Housing Land Supply

Mactaggart and Mickel Homes Ltd notes that the 2024 HLA sets out a deliverable supply of 802 units post-2028 and that LDP3 must therefore allocate sufficient land to meet housing needs. Cala Homes (West) Ltd and Persimmon Homes note that the 2023 HLA programmes less than 900 completions after 2028. Mactaggart and Mickel Homes Ltd note that according to the 2024 HLA, there are only three sites (65 units) in Bearsden, one site (80 units) in Milngavie and no Bishopbriggs sites in the existing housing land supply that are programmed to contribute to the next LDP I-LHLR, settlements they consider to be amongst the most desirable in the country.

In this respect, Mactaggart and Mickel Homes Ltd considers that new allocations should be identified throughout East Dunbartonshire, particularly in Bearsden, Milngavie and Bishopbriggs, to ensure high-quality new housing can be delivered to meet all needs in the area, and that not doing so would fail to achieve those objectives. They maintain that significant land releases would provide the opportunity to deliver transformational extensions to settlements with benefits to the wider area, that would improve the area’s local living and sustainability characteristics.

Homes for Scotland state that the 2023 HLA shows a deliverable supply of only 849 homes from the anticipated adoption of LDP3 in 2028, accounting for the removal of sites which they disputed as part of the audit process. They note that around 40% of completions would occur in the first two years of the plan period and that from 2030 onwards projected completions will not achieve the MATHLR.

Exceeding Past Completions

Homes for Scotland, Cala Homes (West) Ltd, Persimmon Homes and Taylor Wimpey highlight that the Assessment Report from Fife Council’s returned Evidence Report questioned whether it was reasonable to plan for less homes than past completions, with it being stated by the reporter that ‘the evidence report does not directly respond to the question raised by Homes for Scotland on whether planning for less homes than past completions is reasonable’. In this respect, the respondents note that the proposed ten-year I-LHLR of 2700 dwellings would be less than past completions which average at 285 per year or 2850 over ten years. They therefore consider it evident that the reporter will expect the I-LHLR for LDP3 to exceed 2850 dwellings and that setting a I-LHLR of less than that figure will result in the return of the report following appraisal at Gate Check.

Homes for Scotland state that during a meeting between themselves and the Scottish Government, it was ‘recognised that the MATHLR is the minimum level of housing need and true need is between this figure and the need set out in the HFS research’.

Sufficiency of Evidence

Taylor Wimpey has suggested that the Glasgow City Council and Fife Council Evidence Reports did not sufficiently explain evidence on the existing supply. They state that EDC require to provide a clear view of housing supply evidence, including the housing land audit, to provide a clearer understanding of the scale, nature and location of the existing supply of housing land in East Dunbartonshire.

Development of Brownfield or Greenfield Land

Milngavie Community Council, the Mains Estate Residents' Association (MERA) and four individuals consider that brownfield land should be developed in preference to greenfield land or the green belt, noting that NPF4 suggests the setting of green belts to restrict development around towns and cities, protect landscape quality, promote compact growth and other factors. In this respect, Milngavie Community Council, the Mains Estate Residents' Association (MERA) and one individual express concern that there may be insufficient brownfield land in East Dunbartonshire to accommodate the MATHLR or proposed I-LHLR of 2700 units. They suggest that further work should be undertaken by EDC and its partners to direct development to other parts of the Glasgow City Region that may be better placed to accommodate brownfield development, and that development of greenfield land in the City Region should only take place as a last resort.

Mactaggart and Mickel Homes Ltd and Homes for Scotland support the sustainable reuse of brownfield land. Notwithstanding, Mactaggart and Mickel Homes Ltd, Homes for Scotland and Cala Homes (West) Ltd consider that the viability of the sites allocated for housing should take priority in terms of efficiently addressing housing need in the area, and that in some cases greenfield land may be more viable than brownfield land. Implying that the supply of brownfield land may be somewhat constrained versus overall land supply targets, Mactaggart and Mickel Homes Ltd state that greenfield release will be essential to meet the ILHLR, and that this should be reflected in the LDP3 Spatial Strategy.

Infrastructure Provision

Five individuals state that the delivery of new homes should be accompanied by the provision of services and facilities, including healthcare, education, dentistry, transportation (rail and road), community and other services, with it being noted by some respondents that current provision is inadequate.

Mactaggart and Mickel Homes Ltd state that they support new strategic housing sites that can improve access to and the availability of local neighbourhood facilities, such as local hubs which promote sustainable local living. They consider that new housing development can deliver energy efficient, net zero emissions homes, supporting a greener, fairer and more inclusive wellbeing economy and community wealth building, tackling both fuel and child poverty.

Taylor Wimpey seeks to enhance 20-minute neighbourhoods, local infrastructure (including open space), services and facilities in line with NPF4.

Housing by Tenure and Type

One individual considers that affordable housing to accommodate young people with families should be developed and that this should take place in preference to development of accommodation for older people who may or may not have significant asset bases. Lenzie Community Development Trust notes that the 2022 Census reveals that there are 105 one-bedroom dwellings in Lenzie but 788 people living alone, and that this suggests that there may be scope for some people to downsize to a dwelling that better suits their needs. They suggest that EDC should address this potential imbalance, and that a solution may include senior co-housing as championed by Lenzie Community Development Trust.

Noting that the older population is expected to increase by around 26% up to 2028, Mactaggart and Mickel Homes Ltd, Cala Homes (West) Ltd. and Persimmon Homes consider there to be a need to provide housing for downsizers/the elderly. Taylor Wimpey consider that housing developments should provide a wide range and choice of house types and tenures.

Milngavie Community Council, the Mains Estate Residents' Association (MERA) and an individual consider there to be a need for the development of smaller properties that are close to transport links, services and facilities to allow people to downsize and thereby make available a supply of existing larger properties.

Site Assessment and Consideration

Homes for Scotland and Cala Homes (West) Ltd. state that no site appraisal methodology has been shared with them. Homes for Scotland states that they require to be consulted during the drafting of a methodology and would dispute any alternative approach. Homes for Scotland and Cala Homes (West) Ltd. refer to a site assessment methodology prepared by Homes for Scotland and suggest that EDC may wish to discuss the template with Homes for Scotland.

Taylor Wimpey notes that sites allocated in LDP3 should be effective and capable of delivery during the plan period. They note that ownership, physical constraints and infrastructure, deficit funding and marketability are key considerations when assessing sites. They note that intent of NPF4 Policy 16 Quality is to 'encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland'.

Approach to Development

Noting that new housing can help to deliver infrastructure, Homes for Scotland considers EDC's approach to setting the I-LHLR to be cautious or negative rather than ambitious, and a more positive approach would support investment/development, albeit in the context of funding constraints from central government. Highlighting that the LHLR is expected encompass an 'ambitious and plan-led approach', Cala Homes (West) Ltd. note that 2700 is only 200 units greater than the MATHLR, the second lowest of the 15 options presented within the draft Technical Paper. They consider the proposed figure to not be ambitious enough for the LDP3 period. Mactaggart and Mickel Homes Ltd, Gladman Developments Ltd, Persimmon Homes and Taylor Wimpey make similar comments with respect to ambition.

Housing Affordability

Homes for Scotland, Cala Homes (West) Ltd and Persimmon Homes note that East Dunbartonshire has the 4th highest average house prices in Scotland at around £260,000 per dwelling and maintain that high prices have been driven by constrained supply. They also consider housing quality in the area to be low, noting that 3% of homes are below tolerable standard compared to 2% across Scotland, that 25% are in urgent disrepair, that only 6% meet the Scottish Housing Quality Standards and that around 60% have an EPC rating of D or lower. Mactaggart and Mickel Homes Ltd consider that restricting supply would have an adverse effect on the availability and affordability of housing in the area.

Highlighting that that Action 20 of an unspecified plan is to 'ensure that everyone who wants to is enabled to live independently in a home of their own', Mactaggart and Mickel Homes Ltd note that there were 2600-3500 applicants on EDC's housing list and that there is consequently a need for more affordable housing to be delivered.

Education Impact Appraisal

Mactaggart and Mickel Homes Ltd refer to an Education Impact Appraisal they commissioned in mid-2024 which highlights a falling birthrate in East Dunbartonshire (-39% between 1991 and 2023) and a consequent downturn in school rolls. In this respect, they consider that the development of housing will be necessary to generate school aged population within those catchments with falling rolls. They maintain that should larger strategic sites be successfully allocated within LDP3, construction would commence around 2029, and that additional school accommodation should be avoided within the specific catchments as the projected downturn in school rolls would coincide with the development of new housing and future pupils within the catchment, thereby ensuring that the existing school estate remains sustainable in the medium to long term.

Windfall Development

Homes for Scotland note that the draft Technical Paper states that ‘the purpose of the surplus/windfall presented (in Appendix 7) is to represent what may occur if programmed trends at the time of writing are to continue for the LDP3 period’. In this respect, Homes for Scotland, Cala Homes (West) Ltd. and Persimmon Homes maintain that what constitutes windfall has changed since the adoption of NPF4 and that such development now only comprises that which is not allocated within the LDP and is consistent with NPF4 Policy 17, for small scale development within the settlement boundary and for affordable housing developments of less than 50 homes. They state that this new and more restrictive policy therefore means that the windfall estimate set out in the draft Technical Paper is greater than would now be allowed under NPF4, meaning that the housing land supply for the LDP3 period would be smaller than anticipated and that additional deliverable land should have allocated status.

Economic Benefits of Housebuilding

Taylor Wimpey highlights the economic benefits that may be brought about through housebuilding, including community wealth building, community resiliency, capital investment, direct construction jobs, and increasing net additional expenditure through new residents.

Further Engagement on the I-LHLR

Taylor Wimpey understands that further engagement on the LHLR will be undertaken to inform the successful completion of the Evidence Report and allow the Reporter at Gate Check to establish whether there is sufficient, transparent information and explanation to establish an LHLR.

Summary of Council Response

Support for Preferred I-LHLR

Representations that support the preferred I-LHLR are noted. There is reluctant endorsement of the proposed figure at a local community level; those that have expressed support are private individuals or local community groups and not representatives of the development industry. It can therefore be inferred that whilst the

development of new homes may not be desirable in some locations, there is a degree of acceptance of the preferred I-LHLR given the explanation in the draft Technical Paper of how it has been generated and the expectation in NPF4 that the MATHLR must be exceeded.

Alternative I-LHLR – Lower

The representations that seek an I-LHLR lower than that presented as part of the consultation are noted. Notwithstanding, it should be highlighted that there is a clear expectation in NPF4 that the LHLR should exceed the MATHLR. None of the representations made have included any methodology or calculation that would explain or produce a lower figure, other than to highlight that, in the case of 2500 units as proposed, that the figure corresponds to the MATHLR. This argument is considered insufficient in terms of any evidence that might propose an alternative figure. The representation that states that the MATHLR and I-LHLR are reliant on inward migration (and therefore household growth) is correct. However, such an input is a recognised element of the HNDA tool, which is considered robust by the Centre for Housing Market Analysis (CHMA). Adding 25% generosity to the I-LHLR as noted does not comprise double counting because the same approach was taken as with the MATHLR: the only difference between the MATHLR and preferred I-LHLR being use of the high migration scenario rather than the principal projection.

Alternative I-LHLR – Higher

I-LHLR figures of more than 10100 dwellings suggested by Homes for Scotland and its members are not considered realistic, achievable or desirable for several key reasons:

- The generation of the unmet need element of the figure(s) is not based on a robust formula or methodology.
 - Whilst the HNDA process may be subject to certain limitations in terms of its general approach or use of secondary data, the assessment is nonetheless recognised by the Scottish Government and the CHMA. It offers a credible understanding of absolute need (households in temporary accommodation and those that are overcrowded and concealed – or HoTOC) and includes anticipated household growth through migration, plus some additional flexibility.
 - Whilst relatively recent primary data was gathered to produce the Diffley Report, and whilst what has been expressed through the survey may be accurate in reflecting the views of those who participated, the exercise was nevertheless undertaken at a very small scale (266 participants or 0.6% of households East Dunbartonshire). The results have been extrapolated to attempt to gain an understanding of the desire for accommodation within the area as a whole. The survey was appraised by neither EDC nor the CHMA to determine its suitability, its robustness or credibility.
 - The Diffley Report was prepared without the participation of either EDC or the Scottish Government/CHMA. There was therefore neither an opportunity for the findings of the survey and analysis to be discussed, nor for EDC to provide any of its own data and analysis. This lack of engagement represents a potential weakness in terms of preparing the report.
- The Diffley Paper identifies a need for 6600 affordable and 3500 market homes as a minimum, an approximate 2/1 ratio. Given the funding and land constraints to which EDC and RSLs are subject, it is not considered feasible for 660 affordable homes to be delivered each year and, as can be seen from [Appendix 4](#), the level of affordable housebuilding has never achieved a rate of 660 completions per year in any year of the last two decades. Aside from direct

delivery by the Council or RSLs, the viability of affordable housing provision at a 2/1 ratio is also considered unlikely from a private market perspective, as a considerable part of market-led sites would require to be affordable, above 50% in some cases.

- It is notable that the response by Gladman Developments Ltd suggests that the I-LHLR should significantly exceed the MATHLR, but that an alternative figure may not have to be as high as the one set out in the Diffley Report. This remark indicates some lack of certainty on the part of the development industry as to exactly when the Diffley Report figures should be implemented or allocated for, or whether developing 1000+ units per year would be desirable or feasible.
- Given ongoing constraints to the supply of labour, building materials and other resources, it is uncertain that the development industry would be able to deliver such a level of development during the plan period. No evidence has been provided by developers to confirm their capacity to undertake development at that scale. In the absence of this evidence and should land to accommodate 10100+ units be allocated throughout the area, there would be a risk that delivery would be focussed on a small number of sites, and that large parts of the land supply would not be delivered in the plan period. Such an event would be contrary to the expectations of NPF4 and would undermine a plan-led approach.

It can therefore be confirmed that in accordance with the Local Development Plan Guidance (2023), the post-HNDA evidence set out in the Diffley Report has been fully considered as part of the preparation of the Evidence Report and included in terms of discussion and analysis. Various options, including those generated by the Diffley Report, are set out in [Appendix 3](#) of this Technical Paper and an appraisal of the Diffley Report itself is set out in Appendix 6.

As is noted in this Technical Paper, the development of 10100 dwellings would, at a rate of 25 dwellings per hectare as is typical, require a land area roughly the size of Milngavie. As is noted below, it is likely that a considerable number of homes would be developed on greenfield land, given a general lack of available brownfield sites as identified through the 2024 [Brownfield Urban Capacity Study](#). Development would largely be required within open countryside, which would likely pose considerable challenges with respect to rapid impacts on landscape, biodiversity, coalescence between settlements and communities, and the provision of local infrastructure.

Household Needs

Whilst the Council understands that some households may include single adults living with parents or sharing a flat, or families in homes with inadequate bedroom space, it is argued that the HNDA process remains the most robust, recognised and agreed means of understanding housing land supply requirements. The HNDA tool encompasses true need in the form of households that are in temporary accommodation and both overcrowded and concealed. The I-LHLR generation process has employed an identical approach to that used to establish the MATHLR. As discussed above, the outputs of the Diffley Report are considered insufficiently robust to justify their employment in establishing the I-LHLR for LDP3. It is considered that the existing need element of the proposed I-LHLR is credible.

Housing Land Supply

It is acknowledged that the housing land supply set out in LDP2 will not be sufficient to meet the MATHLR or I-LHLR for LDP3, and that some locations in the area are more constrained in this regard than others. However, the running down of supply is a natural feature of the plan-led system. Drawdown from the total supply at the start of the LDP2 period is in fact evidence that allocated sites have been effective and capable of delivery, and that development has been underway. To maintain an

effective supply, new sites are typically allocated in each new plan period, and land to accommodate more than 2700 homes will be allocated throughout East Dunbartonshire as part of LDP3. EDC agrees that new housebuilding can deliver a range of benefits. For this reason, the site appraisal process will seek to identify those locations that are best capable of accommodating sustainable growth, in line with place principles.

Exceeding Past Completions

It is the contention of several respondents that there is a requirement for LDPs to exceed past completions, as may have been implied through Fife Council's Evidence Report Assessment Report. No such requirement is stipulated in NPF4, the LDP Guidance or planning legislation.

Whilst the 03/05/2024 decision of the Court of Session confirmed that there is no 'absolute requirement' to do so, the expectation in NPF4 is that the MATHLR should be exceeded. The proposed I-LHLR of 2700 dwellings, compared to 2500 for the MATHLR, meets this expectation. As set out in this draft Technical Paper, HNDA3 was confirmed to be robust and credible by the CHMA in June 2024 and includes a required land supply of 2450 dwellings, 250 dwellings less than the proposed I-LHLR; minimum land requirements will therefore be met and exceeded. In exceeding the MATHLR, the Council is committed to meeting the requirements of NPF4 and addressing the national housing emergency.

The determination of housing land requirements is unique to each LDP preparation process and is influenced by a range of factors including expected household growth rates and existing need. The availability of brownfield land, infrastructure and other considerations must also be factored into any considerations. Whilst the rate of completions over the period 2005-2024 averaged at around 313 units per year, [Appendix 3](#) of the draft Technical Paper explains that East Dunbartonshire during those years benefitted from a relative abundance of vacant and derelict land at former hospital sites and other brownfield locations, principally during the LP2 and LDP1 periods. As established in the [Brownfield Urban Capacity Study](#) and generally confirmed by representatives of the development industry through [consultation](#) for that study, land of that type is no longer available in large quantity, and it is likely that significant greenfield release will be required to meet the I-LHLR. This will likely involve a delicate trade-off of issues to achieve a desirable outcome. It is unrealistic to expect that land supply should be increased incrementally with each plan period, for reasons of sustainability and practicality.

Notwithstanding these factors, as is set out with respect to windfall development below, it is anticipated that additional non-allocated supply will be forthcoming which will deliver units beyond the I-LHLR itself. This will increase potential delivery during the LDP3 period above that of the supply allocated as part of the LHLR provision.

Sufficiency of Evidence

With respect to the sufficiency of evidence available to explain existing supply, as well as the generation of the proposed I-LHLR, it is considered that the Evidence Report and draft Technical Paper include an abundance of information and explanation on how figures have been established, what the various inputs are and how land supply requirements for LDP3 might be developed. A clear view has been provided of housing supply evidence, including the implications of the HLA, to provide a thorough understanding of housing supply requirements for East Dunbartonshire over the plan period.

Development of Brownfield or Greenfield Land

The development of brownfield land in preference to greenfield land will form a key component of LDP3 in accordance with NPF4. The site appraisal process will more favourably consider previously developed land when identifying sites for housing development. The [Brownfield Urban Capacity Study](#) has identified a range of potential sites for allocation in LDP3, some of which may be suitable for housing. Nevertheless, the statement by some respondents that there is insufficient brownfield land to meet the MATHLR or I-LHLR is broadly correct, and it is likely that significant greenfield release will be required.

With reference to the suggestion that EDC and its partners should direct development to other parts of the Glasgow City Region better placed to accommodate brownfield development, it is considered that the preparation of the I-LHLR has already accounted for this matter because it factors in a 20% reduction in supply to account for mobile demand. Any further reduction would risk the I-LHLR falling below the level of the MATLHR, which as discussed is not considered possible if seeking to accord with the expectations of NPF4.

Infrastructure Provision

The matter of infrastructure provision will be tackled through the plan preparation and implementation processes. In the first instance, the site appraisal process will seek to identify for allocation those sites where infrastructure is already available, can effectively be made available or is otherwise less constrained. This will include access to education, healthcare, community services and other provision, as well as more technical aspects such as transportation, sewerage, water supply, electricity supply, broadband, heat networks and other forms of infrastructure. The second means to address these issues is for the inclusion in LDP3 of developer contributions that will seek payments from developers towards some of the facilities set out above, should any impact from new development be identified.

The contribution of the housebuilding industry to providing or funding some of these facilities through developer contributions and by other means is recognised, as is its impact in terms of delivering modern homes, open space and the impact on local economies as discussed below. Nevertheless, it is noted with respect to the request by several parties for a LHLR of more than 1000 dwellings per year to be set, that no specific detail has been provided as to how infrastructure might be provided to accommodate such a short term, high level of growth. It can therefore be inferred that the intention of the housebuilding industry would be to rely on the public sector to provide many of the facilities and services necessary to enable such development to take place.

Housing by Tenure and Type

The Council agrees that there is a requirement to undertake the development of affordable housing, homes for older people to downsize, smaller properties close to transport links and services, and more broadly for a wide range of house types to be delivered. The intention as set out in the LDP Guidance is that new-style plans should include development briefs and masterplans rather than lengthy text and policy. This approach may help to more carefully tailor where different types of homes may best be supported, considering the housing quality aspects of the draft Technical Paper and the range of information set out in the Evidence Report. This approach is likely to form a key component of the LDP3 Spatial Strategy.

Site Assessment and Consideration

The contention by Homes for Scotland and Cala Homes (West) Ltd. that the site assessment methodology prepared by the Council has not been shared with them is incorrect. An advanced draft of the Site Appraisal Methodology (SAM) for LDP3 was presented to Homes for Scotland, Cala Homes, Taylor Wimpey and other attendees

at the Housing Topic Group held on 27 August 2024, following which a period was allowed for any feedback on the draft to be provided. It should be noted that Homes for Scotland member Taylor Wimpey provided feedback on the draft SAM, as did SEPA, NatureScot and various other stakeholders. Comments provided resulted in a series of amendments to the draft. The draft SAM was shared with key stakeholders a second time and a response was provided by Homes for Scotland and the Mactaggart & Mickel Group on 21 February 2025. Where appropriate, suggestions and clarifications have been incorporated into the methodology.

Concerning Homes for Scotland's draft methodology, it is considered that the Council's own SAM is overall more detailed, thorough and refined in terms of its contents, scope and approach. The SAM will help to ensure that sites selected for allocation in LDP3 are effective and capable of delivering homes. The Council's methodology includes assessment against more than 80 criteria employing a spreadsheet-driven weighting and scoring system, followed by an integrated Strategic Environmental Assessment (SEA). By comparison, HFS's draft assessment methodology includes 13 or 17 criteria, no SEA integration and a spreadsheet with no built-in formulas or calculations to facilitate site appraisal. The process suggested by HFS, including a call for sites, a form of sieving to identify sites with absolute constraints (e.g. flooding or natural environment-designated sites), deliverability and infrastructure considerations, all feature within EDC's methodology.

Furthermore, certain aspects of Homes for Scotland's draft methodology have been incorporated into the amended SAM since feedback was provided, particularly those elements that assess marketability and viability.

Because of the involvement of key agencies, developers and other stakeholders in scrutinising the Council's draft SAM, and the sharing of the draft SAM as part of the Topic Group process, it is not considered necessary for any further consultation to be undertaken. [16C. Site Appraisal Methodology](#) of the Evidence Report provides more details on the SAM.

Approach to Development

It is considered that the Council's approach to setting the I-LHLR has been locally ambitious in that it both exceeds and is based on an expectation of higher inward migration than the MATHLR. The proposed I-LHLR is realistic and has been generated using an adaptation of a formula developed by the CHMA. Allocation of land to meet the I-LHLR will support investment and development to a level considered sustainable in terms of funding, infrastructure and landscape constraints during the LDP3 period. The proposed I-LHLR is 200 units or approximately one extra year of supply above the MATHLR, thereby achieving around 11 years of potential development rather than 10. Those other options set out in the draft Technical Paper are not considered realistic or desirable for the various reasons discussed above.

Housing Affordability

As referred to in this draft Technical Paper, house prices in East Dunbartonshire are higher than the average for the Glasgow City Region and for Scotland as a whole. That housing quality is somewhat lower than the national average has also been drawn from this draft Technical Paper by respondents.

EDC agrees that there is a need to develop affordable housing, to tackle waiting lists and more broadly ensure that everyone has a home to meet their needs and circumstances. The proposed I-LHLR of 2700 dwellings will help to achieve this ambition through the allocation in LDP3 of sites to accommodate private market and affordable homes. The 2024 HLA anticipates a 50/50 split between affordable and private market house completions up to 2031. Whilst this delivery encompasses only

the first few years of the LDP3 period, it is anticipated that proposals for all-affordable or mixed market/affordable sites for allocation will be forthcoming through the Strategic Housing Investment Plan (SHIP) process and the wider call for sites.

It is difficult to establish a direct relationship between the allocation of sites in the LDP and house prices. Whilst the supply of land is a factor, and a shortage of affordable homes does exist in some areas, house prices are also influenced by extensive range of economic and other causes that are difficult to address through the actions of the plan. Notwithstanding, the intention of LDP3 will be to facilitate the development of homes in a sustainable, plan-led manner, working within constraints on infrastructure, landscape and other considerations. As discussed elsewhere in this section, the proposed I-LHLR of 2700 and potential to deliver further homes above and beyond this figure will help to ensure a continued supply of new homes to influence house prices, provision and affordability more broadly.

Education Impact Appraisal

Through its school roll forecasting process, the Council is aware of current and anticipated demand for school accommodation and facilities. Rolls are updated on a regular basis and the developer contributions supplementary planning guidance incorporates an appendix that allows for changes to be made to meet the latest circumstances. The site appraisal process for LDP3 will consider development proposals according to the extent to which they would act to increase rolls above acceptable capacity, or act to increase rolls where it is expected that they would fall, in the interests of ensuring the viability of some schools. The potential for some development proposals to have a positive impact on rolls will therefore be considered as part of plan preparation, as will the degree to which any adverse impacts could be mitigated through developer contributions and other factors.

Windfall Development

Whilst it is acknowledged that NPF4 is overall more restrictive in terms of development taking place on non-allocated sites, this does not mean that windfall development will not take place. The 2024 HLA programmes the development of 65 homes on windfall sites up to the end of March 2031. This consented development is either in accordance with rural policy, is a smaller-scale opportunity within a settlement boundary or constitutes an affordable housing development of fewer than 50 units. It is anticipated that further developments of this type will be forthcoming during the LDP3 period. Therefore, it is considered that the approach in [Appendix 7](#) of the draft Technical Paper to extend forward the programming of the 2026 HLA, constituting actual completions, is sufficiently robust.

Furthermore, it should be noted that the intention when setting the I-LHLR is not to encompass windfall development within the figure itself, but to allocate land to accommodate more than 2700 dwellings. Any windfall development occurring, which the 2024 HLA predicts will be forthcoming at a rate of 9 or 10 units per year, may take place *above* the I-LHLR, constituting a surplus as set out in [Table 2](#) of the draft Technical Paper.

Economic Benefits of Housebuilding

EDC agrees that housebuilding can bring about a range of economic benefits. To encourage these benefits, the purpose of the LDP is to employ a place-based approach that supports the development of homes in a plan-led manner, in collaboration with developers and local communities.

Further Engagement on the I-LHLR

Taylor Wimpey understands that further engagement on the I-LHLR for East Dunbartonshire is or was to take place beyond the public consultation undertaken in November and December 2024. This is incorrect, and no such statement has been made by the Council. The public consultation version of the draft Technical Paper noted that ‘the preparation of the paper (was) ongoing’; however, this refers to the paper as a whole and those sections that would be completed prior to the submission of the Proposed LDP3 for examination, following the Gate Check. The public consultation on the preferred I-LHLR was an appropriate forum for views on housing land supply to be shared and discussed, as is demonstrated above. It is therefore not considered necessary for any further consultation to be undertaken on the draft I-LHLR itself. However, the completed Technical Paper will be subject to public scrutiny during the consultation on the Proposed Plan alongside other supporting documents.

Conclusion

Whilst some parties have suggested a higher I-LHLR, others support the I-LHLR as proposed or consider it should be lower. For the reasons set out above, both higher and lower figures are not considered credible. There is no requirement to exceed past completions when setting the I-LHLR.

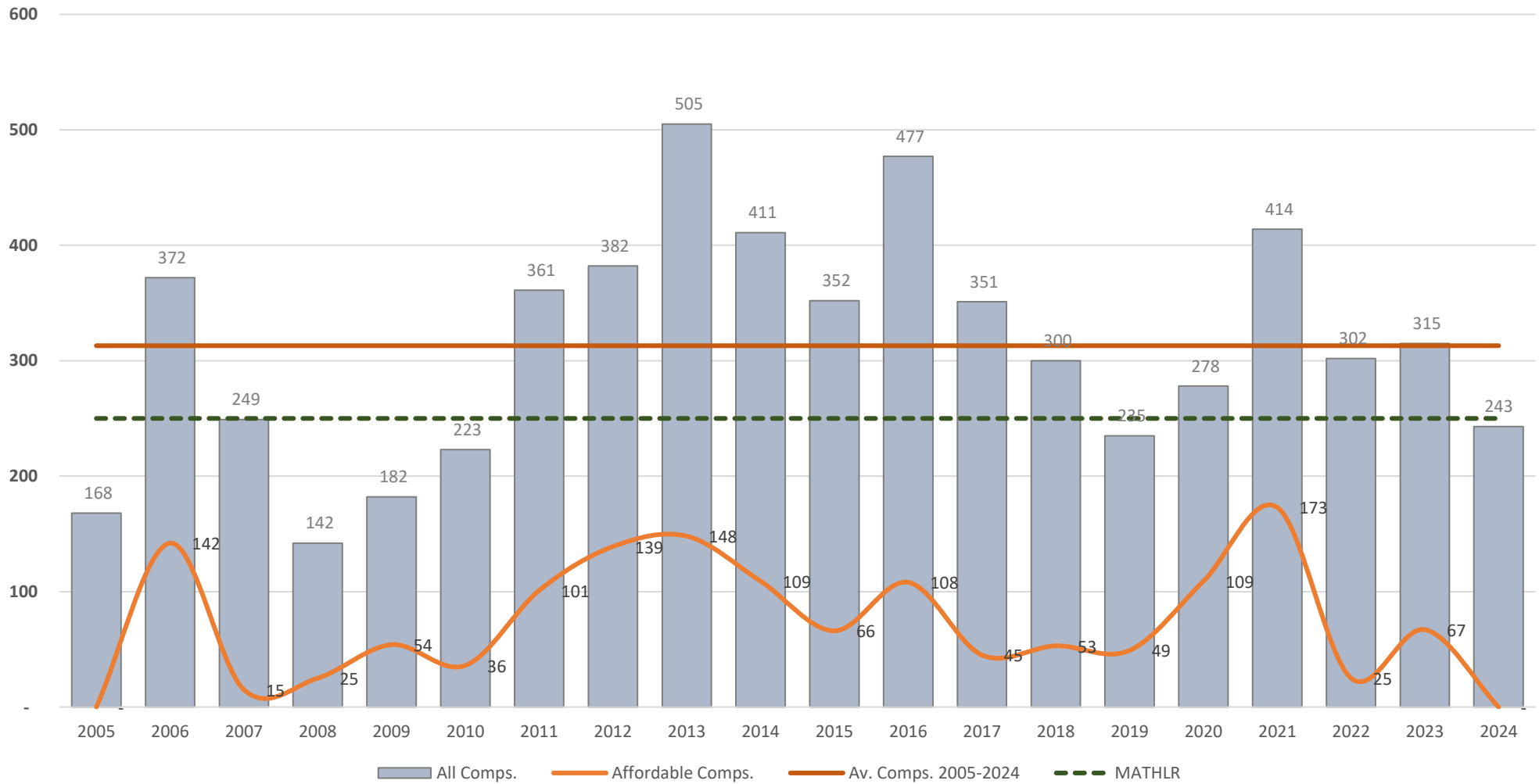
The preparation of LDP3 will consider a range of factors including household needs, housing type and tenure, and the plan will seek to deliver a minimum of 25% affordable homes as required in NPF4. The site appraisal process will consider matters of education and infrastructure capacity. LDP3 will seek to prioritise for development those locations best placed to accommodate growth where possible. Developer contributions and other infrastructure provision will facilitate development during the plan period itself. Careful consideration will be given to the development of greenfield land, to ensure it takes place within the limits of landscape capacity and in such a way as to lessen impacts on biodiversity, and account for any other relevant constraints.

It is notable that the formula used to generate the proposed I-LHLR itself has not been questioned, other than to suggest that some form of double counting has taken place, or that alternative methods are more robust and up to date. This indicates that the approach taken to generate the proposed I-LHLR is sound from a procedural standpoint, and that the difference in opinion would appear to be from a theoretical perspective, to suggest that another *approach* rather than *calculation* would be more desirable. As is set out above, the CHMA/HNDA process is recognised by the Scottish Government and remains the only approved, robust and credible means to determine housing land supply requirements; both the MATHLR and I-LHLR exceed the supply figure for East Dunbartonshire in HNDA3.

With the above factors taken into consideration, it is the view of EDC that the proposed I-LHLR of 2700 dwellings is robust and credible and that a range of other housing-related matters will be carefully appraised prior to and following the adoption of LDP3. No further engagement on the preparation of the I-LHLR is required and the level of detail, discussion and analysis set out in this draft Technical Paper is considered sufficient to allow the Evidence Report to proceed through the Gate Check.

Appendix 4: Past Completions

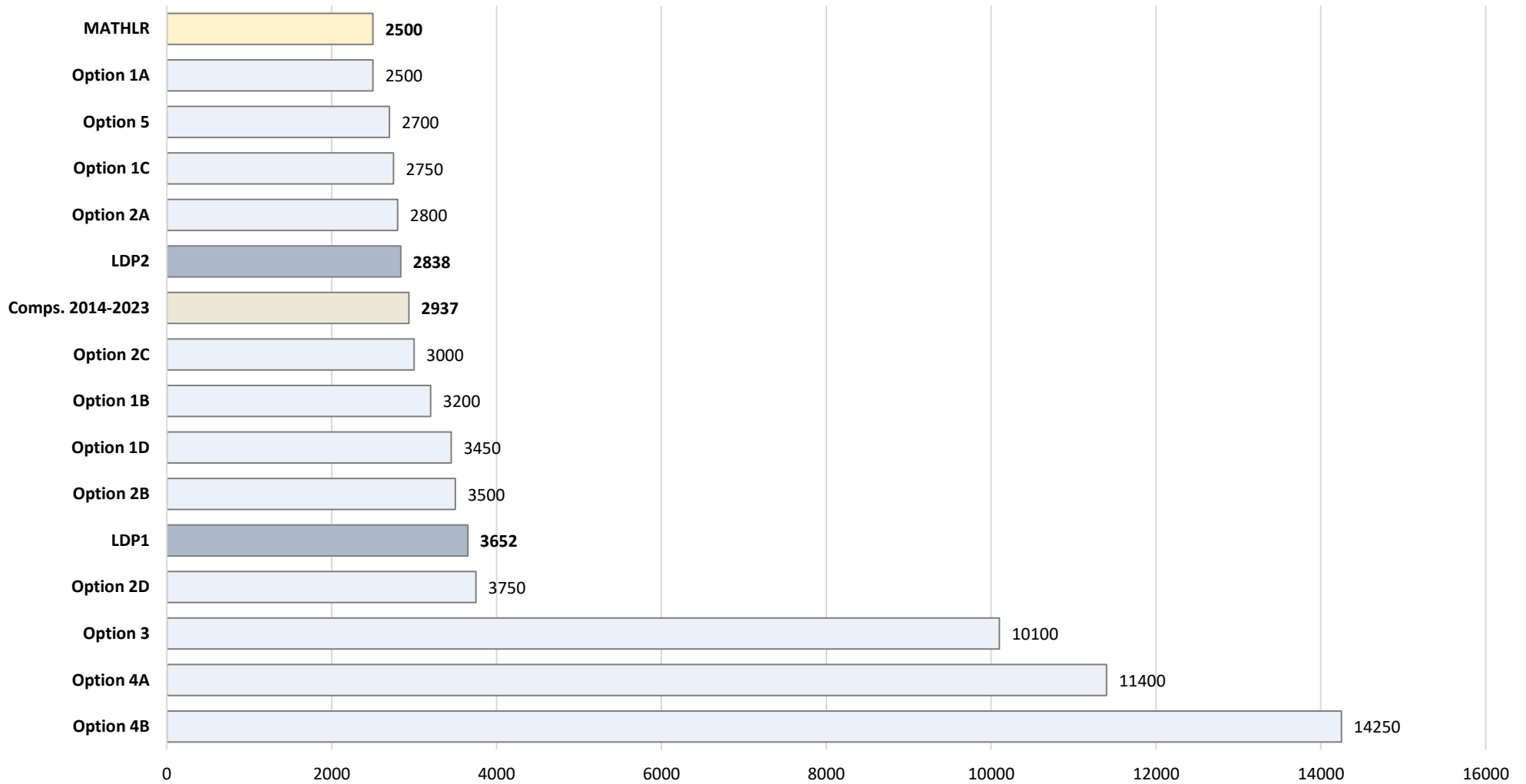
4. House Completions 2005-2024 & MATHLR



Source: Scottish Government - [Housing statistics quarterly update: new housebuilding and affordable housing supply](#) - March 2025. Calendar years.

Appendix 5: Housing Land Allocation LDP1 & LDP2, MATHLR, Completions 2014-2023 & LHLR Options

5. Total Indicative Allocated Land Supply for East Dunbartonshire LDP1 and LDP2, MATHLR, Completions 2014-2023 & Appendix 3 Options



*FOR COMPLETIONS 2014-2023 PLEASE SEE [APPENDIX 4](#)

Appendix 6: Appraisal of Homes for Scotland Paper

Homes for Scotland (HFS) commissioned The Diffley Partnership and Rettie & Co to undertake primary research to understand housing need across Scotland and for each planning authority area. The Council was not consulted as part of the preparation of the report. Published by HFS in January 2024, it is stated by the authors that the report ‘illustrates how existing housing need in Scotland is both more complex and far higher than previously measured’ and that planning authorities should employ the methods set out in the report to understand local need and generate the LHLR. The preparation of the report comprised a survey of 13690 Scottish households with representatives for each local authority area, producing estimates of wider household need so as to inform both Housing Need and Demand Assessments (HNDAs) and subsequent policy decisions on planning for housing. The report argues that 28% of Scottish households currently have a form of housing need, 693000 in total. Notably, this includes 15000 overcrowded households that have at least one concealed family household, which concurs with the Scottish Government’s MATHLR figure for existing need in Scotland based on its definition.

Based on feedback from survey participants and following in-situ repairs made to properties, the report estimates that East Dunbartonshire LDP3 would require a housing land allocation of at least **10100** dwellings, of which **6600** would comprise affordable homes and **3500** market homes. The report notes that ‘some of this housing need could be resolved by addressing under-occupancy of existing homes; promoting available housing in low demand areas; bringing empty homes back into use; and bringing second homes and short-term lets into longer term use. However, building new homes will have to be a significant part of meeting net current housing need.’

It is acknowledged that the paper employs a different approach to estimating housing requirements and evokes some of the complexities surrounding estimating need. It also recognizes the now national housing emergency as declared by the Scottish Government in May 2024. That it involved primary data capture and analysis is also commendable. However, it is considered that much of the identified pent-up demand set out in the report exists in the form of a desire for alternative accommodation of those living with other household members, rather than the absolute need of those living with another household that have a pressing need for their own accommodation. Whilst subject to its own flaws, the first steps of the more sophisticated HNDA process as used to derive the MATHLR figure estimate true need, that is, households confirmed to be in temporary accommodation and those that are overcrowded and concealed (HoTOC), plus household projections. The first of these inputs reflect households in critical need of accommodation of their own. With regard to housing costs, macroeconomic levers outside the control of planning authorities which fall within the responsibility of national government(s) such as taxation and spending can help to address issues of affordability. In the context of a need for sustainable development, the answer is in principle not to construct new buildings in place of older ones; retrofit is the preferred solution. And, although it is understood that there is a desire, for example, for younger people to live independently as set out in the report (concealed) or for additional bedrooms to meet personal circumstances (overcrowded), many individuals in the paper’s household need figure are adequately accommodated with a preference rather than need for alternative premises.

As can be seen in [Appendix 5](#), the allocation in the LDP or LP of land to accommodate more than 10,000 dwellings as a LHLR for LDP3 would be unprecedented and, as discussed in [Appendix 3](#), would have a significant adverse impact upon the area given the constraints to which large areas of land in East Dunbartonshire are subject. Indeed, at a rate of 25 dwellings per hectare as is currently typical for market-provided housing, a total land area of around 400ha would have to be found. For context, this is equivalent to the current built up area of Milngavie.

The suggested figure above can be seen in the range of LHLR scenarios set out in [Appendix 3](#).

Appendix 7: Surplus/Windfall

The Local development planning guidance states that the LHLR can be met by sites with planning permission and windfall development, where this is supported by evidence of past delivery and supported by sound assumptions about likely future trends.

NPF4 Policy 16. Quality homes states that development of new homes on non-allocated or windfall land will only be supported in two circumstances.

- 1) the proposal is supported by an agreed timescale for build-out; and
- 2) the proposal is otherwise consistent with the plan spatial strategy and other relevant policies including local living and 20-minute neighbourhoods,
- 3) and either:
 - o delivery of sites is happening earlier than identified in the deliverable housing land pipeline according to the HLA, or
 - o the proposal is consistent with policy on rural homes, or
 - o the proposal is for smaller scale opportunities within an existing settlement boundary, or
 - o the proposal is for the delivery of less than 50 affordable homes as part of a local authority supported affordable housing plan.

There is therefore scope for unforeseen housing development to occur that could not have been established and allocated during the preparation of the LDP.

The private level of windfall (XA) is calculated through the estimate of a total of **XX** dwellings in private market windfall sites drawn from the first five years of the 2026 HLA. X dwellings per year have been estimated for the remaining X years and rounded to X units to produce **XX** units over ten years.

7A. Private Surplus/Windfall

Settlement	Address	HMSA	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	TOTAL
TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
								XX + XX / X * X = XX

SOURCE: EAST DUNBARTONSHIRE HOUSING LAND AUDIT (HLA) 2026.

The affordable level of windfall (7B) has been calculated from those SHIP sites for which a precise site cannot be determined at this time.

7B. SHIP Surplus/Windfall

Settlement	Address	HMSA	20XX	20XX	20XX	20XX	20XX	TOTAL
TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC

TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC	TBC
								XXX

SOURCE: EAST DUNBARTONSHIRE STRATEGIC HOUSING INVESTMENT PLAN (SHIP) 20XX-20XX

The total estimate of affordable land surplus is calculated by adding those estimated completions from (7B) above to an estimation of completions at an identical rate as detailed in the SHIP 20XX-20XX for the remaining XXXX years. (7C). The remaining affordable housing contribution is drawn from those sites allocated in the Proposed LDP3 of four or more dwellings. This is then subtracted from the total (7C).

7C. Affordable Housing Land Surplus/Windfall

HMSA	A. SHIP Surplus/Windfall	B. SHIP 20XX-20XX	C. Affordable Policy Sites	D. (B. - C.)	A. + D. (Surplus)
GGNW	TBC	TBC	TBC	TBC	TBC
SGNE	TBC	TBC	TBC	TBC	TBC
EDC	TBC	TBC	TBC	TBC	TBC

*AS A PROPORTION OF TOTAL ALLOCATED LAND WITH THE POTENTIAL TO DELIVER AFFORDABLE HOMES THAT DOES NOT FALL WITHIN THE SHIP 20XX TO 20XX. **ON THE ASSUMPTION THAT A PROPORTION OF THE SHIP UNITS WOULD BE ACCOMMODATED WITHIN PRIVATE MARKET SITES WITH AN AFFORDABLE REQUIREMENT. THE REMAINDER WOULD CONSTITUTE WINDFALL DEVELOPMENT.

This produces a total of XXX units and a total affordable housing land supply of XXXX dwellings. Please note that this level of completions is reliant on the future development of the SHIP as desired by the Housing service.

It is anticipated that a further source (7D) of potential additional supply may be sourced from the reuse of [long-term empty dwellings](#) (those which have been empty for more than six months and are liable for council tax). The number of such dwellings fluctuates from year to year. For the purposes of this estimate, the most recent yearly tally of empty homes will be applied to the estimated surplus.

7D. Empty Homes, Second Homes and Short-Term Let Surplus/Windfall

EDC	A. Long-term Empty Dwellings (20XX)	B. Second Homes (20XX)	C. Short-Term Let Applications (20XX)
	TBC	TBC	TBC

The total surplus/windfall is calculated by adding the estimated affordable surplus/windfall to the estimated private surplus/windfall (7D).

7E. Total Land Surplus/Windfall

HMSA	A. Affordable Surplus/Windfall	B. Private Surplus/Windfall	C. 7D Surplus	D. TOTAL (A + B + C)
GGNW	TBC	TBC	TBC	TBC
SGNE	TBC	TBC	TBC	TBC
EDC	TBC	TBC	TBC	TBC

Appendix 8: Allocated Housing Land Supply

8A. Ward 1 - Milngavie

Site Ref.	Settlement	Address/Description	Sub HMA	Pipeline	Ind. Cap.
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TOTAL					TBC

8B. Ward 2 - Bearsden North

Site Ref.	Settlement	Address/Description	Sub HMA	Pipeline	Ind. Cap.
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TOTAL					TBC

8C. Ward 3 - Bearsden South

Site Ref.	Settlement	Address/Description	Sub HMA	Pipeline	Ind. Cap.
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TOTAL					TBC

8D. Ward 4 - Bishopbriggs North and Campsie

Site Ref.	Settlement	Address/Description	Sub HMA	Pipeline	Ind. Cap.
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TOTAL					TBC

8E. Ward 5 - Bishopbriggs South

Site Ref.	Settlement	Address/Description	Sub HMA	Pipeline	Ind. Cap.
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TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TOTAL					TBC

8F. Ward 6 - Lenzie and Kirkintilloch South

Site Ref.	Settlement	Address/Description	Sub HMA	Pipeline	Ind. Cap.
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TOTAL					TBC

8G. Ward 7 - Kirkintilloch East and North and Twechar

Site Ref.	Settlement	Address/Description	Sub HMA	Pipeline	Ind. Cap.
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TBC	TBC	TBC	TBC	TBC	TBC
TOTAL					TBC

8H. Ward Population Proportion vs. Allocated Capacity Proportion

Ward	Population*	% EDC total population	Ward total allocated cap.	% EDC total allocated cap.
Ward 1 - Milngavie	13536	12.4%	TBC	% TBC
Ward 2 - Bearsden North	15050	13.8%	TBC	% TBC
Ward 3 - Bearsden South	13238	12.2%	TBC	% TBC
Ward 4 - Bishopbriggs North and Campsie	19255	17.7%	TBC	% TBC
Ward 5 - Bishopbriggs South	15758	14.5%	TBC	% TBC
Ward 6 - Lenzie and Kirkintilloch South	13545	12.4%	TBC	% TBC
Ward 7 - Kirkintilloch East and North and Twechar	18518	17.0%	TBC	% TBC
TOTAL	108900	100%	TBC	100%

*2021 ELECTORAL WARD POPULATION ESTIMATES (2011 DATA ZONE BASED)

8I. Initial Housing Land Pipeline

Site Ref.	Settlement	Address/Description	Sub HMA	Pipeline	Ind. Cap.
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TBC	TBC	TBC	TBC	Short-term	TBC
TBC	TBC	TBC	TBC	Medium-term	TBC
TBC	TBC	TBC	TBC	Longer-term	TBC
				TOTAL	TBC
				LHLR	TBC

Appendix 9: Early Evidence Gathering Housing Land Public Comments

Question - How do you think LDP3 should address housing and place?

Comments made as part of public engagement for the LDP3 Evidence Report regarding housing are summarised as follows:

- Location and place - Many respondents expressed a desire to avoid the development of greenfield land, that areas of biodiversity value and flood risk should particularly be avoided, and that housing development should be focussed on urban brownfield land and in town centres. Some respondents did however state that new building on greenfield land was required and that some agricultural land is of a low quality.
- Requirements for new housing - Many comments stated that the quality, range and affordability of the new housing that gets built in the area needs to be improved including: a higher percentage of affordable housing, more smaller homes, better house design particularly regarding energy efficiency and adaptability, better ancillary spaces and facilities for residents and opportunities for self-build plots.
- Infrastructure and services - Many responses stated that new housing should not be developed in the area because of a lack of infrastructure and facilities, or that an infrastructure first approach must be taken whereby those services are delivered before or in tandem with new residential development. There was also strong support for 20 Minute Neighbourhood and local living principles and the delivery of communities that can meet their day-to-day needs within walking distance or as close by as possible.
- Housing land requirement and developer input – Comments from the housebuilding industry referred to the requirement to exceed the Minimum All-Tenure Housing Land Requirement for East Dunbartonshire stated within National Planning Framework 4 (NPF4) - 2,500 dwellings over the 10-year period for LDP3. Responses from housebuilders also expressed perceived deficiencies in the Scottish Government’s Housing Need and Demand Assessment (HNDA) tool and, using their own methods, stated that there are 14,271 households in East Dunbartonshire where their housing need is unmet.

