

█ doesn't think there is much disparity between the two. Looking at individual years, there will always be differences as the SG series is based upon issuing of completions certificates and the HLA is based upon physical visits. Completion certificates and the processing of them on uniform can involve quite a lag causing completions that we count one year appearing on the next year for SG figures and vice versa. Also, its possible that SG have compared the new build completions series to the HLA which doesn't include conversions and subdivisions – we get a substantial number of those. If you look at the averages over the last years – the two series are pretty close – see table below.

	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	Average 2014 - 2019
<i>Scottish Gov New build</i>	1523	1812	2229	1832	2813	3127	
<i>Scottish Gov Conversions</i>	35	23	234	290	238		
SG - All Completions	1558	1835	2463	2122	3051		2206
HLA - all completions	1525	2281	2391	2650	2399	2967	2249

Existing Need:

The Council published its updated Rapid Rehousing Transition Plan recently. The figure for duty to provide settled housing in that is 4766, a 15% increase on the previous year. It should be noted that this despite quite significant reductions in the figures for domestic ejection, dispute and tenancy loss, particularly in PRS. Clearly a large proportion of those will have been affected by Covid reducing the options for people to move and Covid regulations reducing loss of tenancy e.g. PRS loss down from 638 in previous year to 219. Therefore it remains a conservative estimate feeding into the justification for the affordable housing commitment as commented on below.

Additional Households:

CHMA HNDA tool uses household projections under the assumption that past trends are a good proxy for demand. This assumption is only fair for a self-contained housing market area (Edinburgh isn't one) and for a housing market operating without constraints. Households working and probably wishing to live in Edinburgh are living in neighbouring council areas and commuting in. Previous SDP and structure plan spatial strategies were for significant amounts of CEC's demand for housing being met elsewhere in the 'functional housing market area'. Assuming these strategies were even partially successful, the result is that CEC hasn't grown as it might – the trends that the latest projections are based on have been affected by constraints imposed by regional policy – **they are not a perfect (acceptable?) proxy for demand** – If we make land available, Edinburgh will be allowed to grow faster than projections suggest.

In the discussion I noted that the submission had been approved by Planning Committee and that whilst there is scope for change in respect of the existing need figure for duty to provide housing as this was flagged up in the report, we're not in a position to amend household projections unless we were to take a further report back to committee. Your methodology set out potential options for considering how a different approach to household projections or how local policy initiatives might be some of the ways to amend the base figures. The spreadsheet calculator gave limited options for recording this and therefore it was entered as submitted.

The key aspect of this part of the conversation was whether the input of local policy initiative (20000 affordable homes commitment) narrated in the written return, including the justifications for it, can be amended instead to higher household projections given the increase was entered on that line in the spreadsheet (The submission explained the reasons for doing this, to avoid any corruption of the spreadsheet by adding additional lines. My view remains that officers cannot depart from the approved committee report which set this out as a means to meet the policy initiative, at least not without going back to committee to have such a change approved.

However, the evidence given in the written return can also be read as evidence of additional household formation that in turn justifies the local policy initiative. In a sense the evidence supports either approach. It may be that the Scottish Government takes a pragmatic view that this should be extracted from local policy initiatives and expressed as a different view of household projections. In the absence of an established methodology for the latter it has been expressed by the Council in terms of its policy initiatives. Ultimately this changes where the numbers slot in rather than the numbers themselves. Therefore I do not see an issue in the government translating the policy initiative into a change in the projections for methodological consistency if it sees that as an appropriate action.

Trust this explains each point but please let me know if further commentary is needed,