

Integrated Impact Assessment – Summary Report

Each of the numbered sections below must be completed

Please state if the IIA is interim or final

Final

1. Title of proposal

Supplementary Guidance (SG) on Developer Contributions and Infrastructure Delivery.

2. What will change as a result of this proposal?

New Supplementary Guidance has been prepared to address the need for guidance on how to interpret and implement Policy Inf 3 in the adopted City Plan 2030. This will set out requirements for developer contributions to fund proposals and actions required to deliver City Plan 2030.

3. Briefly describe public involvement in this proposal to date and planned

No pre-consultation has taken place for this SG apart from the City Plan 2030 process. Through City Plan 2030, the policy to which this SG relates has been subjected to full statutory consultation. City Plan 2030 has been the subject of early engagement, consultation period on the issues stage, and a statutory period following Council approval and publication of the Proposed Plan followed by the Examination process.

As a result, the principle of development and growth in the city, the impact on existing infrastructure, and available capacity of necessary infrastructure, and hence the need for an infrastructure contributions policy has been set in City Plan 2030 which was the subject to a wide consultation process.

The City Plan 2030 process involved interested parties engaged in the development industry including developers and landowners, service delivery partners, key agencies and the wider community. It also involved secondary stakeholders such as communities affected by development as well as the wider resident population as infrastructure users.

A draft version of the SG was published on the Council's Consultation Hub for an eight week period. A total of 28 responses were received and these helped to review and inform the final version which will be presented to Planning Committee on 11 December 2024.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

Yes

5. Date of IIA

The final IIA scoping meeting was carried out on 20 November 2024 to take into account the engagement findings.

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Draft IIA

Name	Job Title	Date of IIA training
Naomi Sandilands (lead)	Senior Planning Officer	10 March 2022
Francis Maddicott		N/A
Jackie MacInnes	Senior Planning Officer	14 December 2022
Chris McKee		TBC

Final IIA

Name	Job Title	Date of IIA training
Naomi Sandilands (lead)	Senior Planning Officer	10 March 2022
Jackie MacInnes	Senior Planning Officer	14 December 2022
Anna Grant	Team Manager	25 October 2022
Keith Miller	Senior Planning Officer	14 December 2022
Robert McIntosh	Planning Officer	2019

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need	<p>Evidence based for City Plan 2030 including Education Appraisal, Transport Assessment and Healthcare Appraisal.</p> <p>All available at https://www.edinburgh.gov.uk/cityplan2030</p>	<p>Over the last ten years, Edinburgh’s population has grown by more than 57,000 – an increase of 13%.</p> <p>Growth is projected to continue at an annual average of almost 3,500 per year in the period to 2032 taking the total population to 563,600. The growth is not projected to be uniform across all age groups. The greatest increase in population is projected for older people with the number of people aged over 65 increasing by 28,000. School age children are projected to experience a moderate increase numerically with a growth of 1,500 primary age children and 3,700 secondary school age.</p> <p>By 2032, the average household size in Edinburgh is projected to fall to 2.0. The decreasing household size in the City means that household growth</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<p>will even higher than the population growth. By 2032, the number of households is projected to increase by 18% - a growth of 41,000.</p> <p>There are disparities across the city with pockets of poverty, low income and multiple deprivation. Around 29,500 people in Edinburgh live in the most deprived 10% of areas in Scotland. This represents around 5% of Edinburgh total population. Public transport accessibility varies across the city. Overall, 25% of Edinburgh's population live in areas classed in the highest accessibility levels whilst 42% live in the lowest accessibility levels.</p> <p>In general, the population of Edinburgh enjoys a high standard of health. Life expectancy is high with females living 81.1 years and males living to 77.1 years.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<p>However, there are significant inequalities in general health and mortality rates between different neighbourhoods within the city.</p> <p>SESPlan Housing Need and Demand Study (HNDA) provides evidence of housing need within the Edinburgh Housing Market area.</p> <p>The needs of families, older people, households containing persons with a disability and gypsies and travellers have been considered in the HNDA.</p> <p>Evidence indicates building affordable and sustainable housing is a priority, with a variety of house types and sizes to promote and encourage mobility in the housing system.</p> <p>The social, economic and physical environmental conditions in Edinburgh are variable and therefore do not</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		provide a consistent quality of environment adequate to ensure good standards of public health across all areas and communities.
Data on service uptake/access	Evidence based for City Plan 2030 including Education Appraisal, Transport Assessment and Healthcare Appraisal. All available at https://www.edinburgh.gov.uk/cityplan2030	
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	Scottish Index of Multiple Deprivation (SIMD)	See “Data on populations in need”.
Data on equality outcomes		See “Data on populations in need”.
Research/literature evidence	<p>Yes - which included the following:</p> <p>City Plan 2030: Monitoring Statement</p> <p>City Plan 2030 Housing Study, January 2020</p> <p>Choices for City Plan 2030</p> <p>Housing Need and Demand Assessment 2</p> <p>Choices for City Plan 2030: Financial Resources Appraisal</p>	<p>The information provided has been drawn from City Plan which is the most up-to-date held by Planning prior to the release of the census data. City-wide data has been produced given that the impacts of the WEPFSM affects primarily all. City Plan is informed by the priorities set out in a number of other strategies including:</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>Edinburgh Strategic Sustainable Transport Study - Phase 1</p> <p>Equalities and Rights Assessment in respect of SESPlan and the current Local Development Plan</p>	<ul style="list-style-type: none"> • Edinburgh Partnership Community Plan 2018-2028 • Council Business Plan 2017- 2022 • City Housing Strategy • City Mobility Plan • Edinburgh Economy Strategy <p>A monitoring statement has been prepared for City Plan 2030 which provides an evidence base as to why change is needed. The monitoring statement identifies the key physical, economic, social and environmental changes occurring in Edinburgh since the adoption of the current Local Development Plan in November 2016; assesses the effectiveness of the previous Local Development Plan policies; and provides an information base to help assess the performance of City Plan 2030 in the future.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<p>An Equalities and Rights Assessment prepared for City Plan 2030 provides further evidence. No negative impacts were identified.</p> <p>In addition, there are more recent Council strategies that have been considered; notably:</p> <ul style="list-style-type: none"> • Business Plan 2023-2027 • End Poverty in Edinburgh Delivery Plan 2020-2030 • 2030 Climate Change Strategy • Edinburgh Partnership Community Plan 2022-2028 • Local Outcome Improvement Plan • 20 Minute Neighbourhood Strategy • Equality and Diversity Framework 2021-2025 • Edinburgh Economy Strategy

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Public/patient/client experience information	N/A	
Evidence of inclusive engagement of people who use the service and involvement findings	N/A	
Evidence of unmet need	Evidence based for City Plan 2030 including Education Appraisal, Transport Assessment and healthcare appraisal. All available at https://www.edinburgh.gov.uk/cityplan2030 . Edinburgh’s Open Space Strategy Edinburgh City Mobility Plan	See “data on populations” in need.
Good practice guidelines	Planning Circular 3/2012: Planning Obligations And Good Neighbour Agreements (Revised 2020) . NPF4 Policy 18	
Carbon emissions generated/reduced data	2030 Climate Strategy	
Environmental data	Environmental report for City Plan 2030 Habitat Regulations Appraisal proposed plan stage (City Plan 2030) Vision for Water Management in the City of Edinburgh	
Risk from cumulative impacts	Yes	
Other (please specify)		Consultation responses

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Additional evidence required	Supplementary Guidance in Developer Contributions and Infrastructure Delivery – Update, 26 February 2020 LDP West Edinburgh Transport Appraisal Refresh (November 2016). LDP Transport Appraisal Addendum update (November 2016). Report to Finances and Resources Committee of 3 February 2022 on Sustainable Capital Budget Strategy 2022-2032.	

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Positive</p> <p>Guidance provides the mechanism to deliver and fund the proposals in Part 4 of City Plan 2030. It will provide the funding and delivery of infrastructure including healthcare and education.</p> <p>The planning and appraisal work (evidence base) to deliver these policies and this Statutory Guidance should ensure that appropriate levels of access to essential services.</p> <p>Addresses the impact of new development by providing additional community infrastructure to minimise impact on the existing community’s access to services.</p>	<p>All people including those with protected characteristics</p> <p>Especially people using education services and high users of the health service, or people with complex health needs, e.g. elderly, the young and those living with a disability.</p>

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>It will support Living Well Locally by bringing community services closer to homes and linked better to active travel and public transport infrastructure.</p> <p>Locally based community facilities increase community cohesion and reduces social isolation.</p> <p>The delivery of key infrastructure such as improved active travel options; and access to green space will contribute to health and well-being.</p>	
<p>Negative</p> <p>The cost of the Developer Contributions and their cumulative impact could make development within Edinburgh unviable – possible failure to achieve our required number of homes including affordable homes</p> <p>Impacts if the costs are challenged or result in viability issues. Construction costs are increasing may impact on delivery – resulting in a funding gap exposing the Council to further financial pressure, or delays in delivery if private sector funding, for example, through this Guidance’s mechanism is not realised or is challenged.</p> <p>The lack of delivery could result for example in poorer services, over-capacity services and constrained premises as well as prolonged instances where healthcare premises close or restrict their patient lists.</p> <p>Inability to provide ‘local’ schools resulting in longer distances to travel to school and reduction in school choice.</p> <p>Lack of locally based community facilities reduces community cohesion and increased social isolation.</p> <p>Requirement to travel to access essential services if they are not provided locally which incurs time and travel costs but also adds difficulty for people with protected characteristics e.g. mental health issues such as anxiety and those with physical disability.</p> <p>Encourages private car use to access facilities which disproportionately impacts those unable to drive or cannot afford to drive.</p>	<p>All and in particular those vulnerable to poverty, older people and disabled people along with other people with protected characteristics.</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>Positive Provides the planning and funding for some aspects of open space, public realm and blue green infrastructure which will help to manage aspects of climate change, improve biodiversity.</p> <p>Improvement to locally based services which are accessible by sustainable transport; reducing the need to travel by private vehicle and reduce pollution and congestion.</p> <p>New infrastructure will be constructed to higher environmental standards which will reduce running costs, overall carbon footprint etc.</p>	All
<p>Negative If this Guidance negatively impacts on development finance, this could result in development not being implemented on the ground or delayed. If contributions are challenged through s.75a of the Planning Act, this could lead to no service improvements and lack of delivery of essential services.</p> <p>On the ground, this will be felt by future and existing residents experiencing longer journey times, no improvements to active travel or public transport provision; further distances to services, older premises remain in use (i.e. no improvement of u-value, increased running costs).</p> <p>Encourages private car use to access facilities which has a carbon impact.</p>	All especially those vulnerable to poverty, people leaving care, older people and disabled people along with other people with protected characteristics.

Economic	Affected populations
<p>Positive Provision of new school, healthcare, parks etc. all contribute in terms of direct construction jobs and training opportunities, supply chains and support for local businesses i.e. shops, cafes etc.</p> <p>Provision of services supports and attracts other similar and/or supporting businesses which provides local employment. Role in community wealth building.</p>	<p>All including those vulnerable to poverty, along with other people with protected characteristics.</p> <p>Business/landowners/developers/Registered Social Landlords/ Applicants in the planning system including individuals.</p>

Economic	Affected populations
Improvement in active travel and public transport links opening up employment opportunities.	
<p>Negative</p> <p>Failure to deliver because of challenge to the contribution, potential impact on delivery and Council's and partner's funding gap. Affect timing or quality of infrastructure ultimately provided for communities.</p> <p>Without the means to effectively take proportionate contributions, the Council's ability to fund and deliver infrastructure required to support City Plan 2030's growth is significantly impacted.</p> <p>The cost of the Developer Contributions could make some development within Edinburgh unviable – failure to capitalise on economic benefits of a strong construction industry and the associated benefits of new development and businesses.</p>	All including those vulnerable to poverty, people leaving care, older people and disabled people along with other people with protected characteristics.

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children's rights, environmental and sustainability issues be addressed?

No

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

There was a public engagement exercise which was limited to on-line via the Consultation Hub. This was promoted via a range of communications including targeted e-mails, Blog, mailing lists etc.

Given the limited number of intended users of the document i.e. developers, landowners, rather than the wider public, it was considered reasonable for the engagement to be limited.

There was also discussion with key agencies, stakeholders and CEC services in reviewing the Guidance.

- 11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.**

The Guidance has been screened and a SEA is not required.

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

Consultation responses received have informed the review of the Guidance.

- 13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:**

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Delivery Programme for City Plan 2030 – ensuring consistency with the Guidance	Ross Irvine, Planning Officer	January 2025	
Training and support for implementation of the Guidance to ensure consistency of application by planning officers	Naomi Sandilands, Senior Planning Officer	On-going	
Monitoring of developer contributions and delivery of infrastructure	Naomi Sandilands, Senior Planning Officer	On-going	
Liaison with delivery partners i.e. NHS Lothians,	Naomi Sandilands, Senior Planning Officer	On-going	

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

Yes – wider economic picture impacting on house building, construction industry which slows down development and therefore the delivery of key infrastructure/ developer contributions.

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

For City Plan 2030, there is currently a statutory requirement to review a local development plan every five years. At review stage, a Monitoring Statement will be required to be published which will consider the effectiveness of City Plan 2030 including delivery of housing sites, contributions and the Delivery Programme.

16. Sign off by Head of Service

Name

David Givan

Date

26 November 2024

17. Publication

Completed and signed IIAs should be sent to:

integratedimpactassessments@edinburgh.gov.uk to be published on the Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care

sarah.bryson@edinburgh.gov.uk to be published at www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/