

Dear Sirs

The Scottish Planning Consultants' Forum welcomes the opportunity to comment on the *Housing Technical Discussion Paper*.

We are aware National Planning Framework (NPF) 4 is required to contain ...*targets for the use of land for housing in different areas of Scotland*... to ensure that local development plans allocate sufficient land for housing.

The Discussion Paper sets out Scottish Government's thoughts on the methodology which may be used for setting ...*targets for the use of land for housing in different areas of Scotland*. Scottish Government is proposing that these housing land figures would be set out in the Draft NPF 4 and be subject to transparent scrutiny when it is laid before Parliament.

Draft NPF 4, along with those associated housing land figures, was due to be laid before Parliament in September 2020. We understand this will be delayed until late 2021 now.

This presents Scottish Government further opportunity to engage with stakeholders on matters set out in the Discussion Paper.

The Discussion Paper identifies that Scottish Government could adopt the outcomes of the Housing Need and Demand Assessment (HNDA) Tool to provide all-tenure housing need and demand estimates for each local authority area for the time period under consideration.

In principle, this is a suitable means to establish housing need and demand across Scotland over an appropriate period of time. This period will likely be a 10 year period in accord with the requirements of the *Planning (Scotland) Act*.

The HNDA Tool is not without its own issues. The HNDA Tool adopts both the principal household projections from the National Records of Scotland (NRS) and an existing count of need based on homeless households in temporary accommodation and households who are both overcrowded and concealed (HoTOC).

However, the default in the HNDA Tool does not align with the household projection change as set out in NRS projections. Instead, it allows the user to capture household change from the base year of the model's run. It therefore potentially can lose the household projection change from the base date of the NRS household projections. This continues to be a fundamental issue with the HNDA Tool. The HNDA Practitioners Guide provides essential clarity that future household formation from the NRS projections has to be met though the provision of additional housing units. The HNDA Tool therefore will require modification to ensure that the base date of the NRS household projections, be it 2016, 2018 or 2020, is adopted for the housing land figures.

Regarding the existing need count, the HoTOC method may significantly underestimate those households who are homeless as well as those that are overcrowded and concealed.

The Crisis Paper by Glen Bramley, published in 2018, examined housing need and demand across the United Kingdom. The Crisis Paper considers many additional sources to establish the existing need count, including:

- a) Concealed/sharing households as percent of all households.
- b) Backlog housing needs – percent of all households with one or more of affordability problems, overcrowding, concealed, sharing or unsuitable housing
- c) Core Homelessness - number of households estimated to be rough sleeping or in similar situations, or in hostels, unsuitable temporary accommodation or sofa-surfing;
- d) Wider homelessness - households who are statutorily homeless but not in 'core' group above, plus other households at significant risk of falling into homelessness in coming year;
- e) Annual net new need for affordable housing - the number of households newly forming, plus half of net migrant households to area, who are unable to afford market rent, less the annual flow of relets of social housing (excluding transfers); and

- f) Chances of rehousing - the annual flow of lettings of social housing to new tenants as a percentage of the backlog housing need.

In terms of the HNDA Tool, the existing need count identified through HoTOC, when compared Bramley's definition is an incomplete consideration and presentation of nationally available data.

For homelessness, Scottish Government data identifies that there are 29,894 household applications assessed as homeless or threatened with homelessness across Scotland. The HoTOC method only accounts for 10,989 temporary homeless households. Compared to Scottish Government data, this is a significant underestimate of the existing need.

For overcrowded and concealed households, the HoTOC method only takes into account those households that are **both** concealed and overcrowded and adopts a percentage below that of United Kingdom. The available data is also significantly out of date, with local authorities now unlikely to undertake new survey work to provide more up to date primary data.

Another issue is that the HoTOC method does not identify a single person as a "household" and therefore a young adult living at home with their parents does not count as existing need. If that young adult was living with their partner in their parents' home, they would be considered a concealed household. To add to the confusion, if that couple had their own bedroom in the parents' home, this would not be living in overcrowded accommodation and so would not count as existing need. The HNDA Tool therefore may ignore the housing needs of up to a quarter of the young adult population in Scotland.

Scottish Government, through NPF 4, needs to be planning for all those people who are registered homeless and are in concealed and overcrowded households, including the those young adults living in their parents' home.

It is essential that the HNDA Tool is updated to properly capture the housing need and demand across Scotland, rather than the minimal position currently being presented.

Only when a proper assessment of the full data is available, can realistic ...*targets for the use of land for housing in different areas of Scotland*... be provided in NPF 4. This adjustment is essential to ensure that NPF 4 sets realistic targets for local development plans allocate sufficient land for housing.

We would welcome the opportunity to discuss the content of the Paper with Scottish Government in due course.

Kind regards,

Stuart Salter

On behalf of the Scottish Plannign Consultants' Forum