

Appendix 1

National Planning Framework 4

Minimum All-Tenure Housing Land Requirement

RESPONSE TEMPLATE

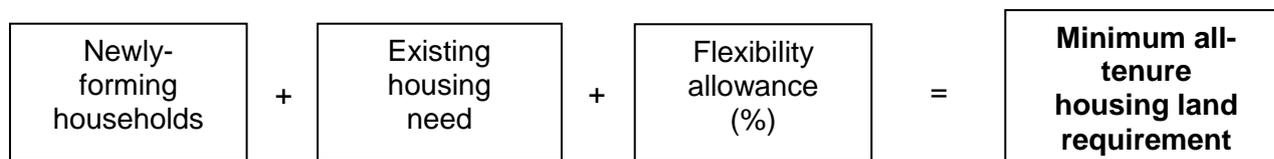
Scottish Government

Planning & Architecture Division and Housing & Social Justice

February 2021

PURPOSE

The Scottish Government has produced initial default estimates of the 10-year minimum all-tenure housing land requirement for each local authority and national park authority. These are derived from three main inputs:



The initial default estimates are set out in the Guidance and Method Paper that accompany this Response Template. They are a first step towards developing a Scotland-wide picture of the amount of land for housing that will be needed in the future to guide allocations in Local Development Plans (LDPs). They are a starting point for authorities to consider and input to in order to inform the final figures that will feature in the draft NPF4.

Authorities are being asked to consider the default assumptions for household projections and existing housing need, flexibility allowance and estimates and to make a case for adjusting them where there is clear and robust evidence and policy requirements do to so. The Guidance indicates how authorities should go about making the case for change and this template must be used to respond. The two should therefore be used in tandem. Please note that word limits set out in the template must be observed as closely as possible.

An Excel Calculator is also provided. It shows the default calculations and allows authorities to input adjusted data in three simple steps to produce locally adjusted estimates. If making a case for change, authorities must use the calculator and submit this alongside the template.

Prior to submitting the template to the Scottish Government for formal assessment, authorities are encouraged to discuss this with Scottish Government housing and planning officials and to seek any advice as they build a case. Requests of this nature should be sent to the following mailbox (NPF4housingland@gov.scot) in the first instance.

On completion, the response template and calculator should be submitted to the mailbox for assessment by Scottish Government housing and planning officials. The appraisal criteria that will be used are set out in the accompanying Guidance. A short Assessment Report will be written-up and this will contain the Scottish Government's decision.

STEPS TO TAKE

- Step 1** Read the Guidance and Method Paper accompanying this template.
- Step 2** Work with your Housing Market Partnership (HMP) and local stakeholders to consider and discuss the initial default estimates of the minimum all-tenure housing land requirement.
- Step 3** Use this response template to make a case for any adjustments you wish to make to the initial default estimates. Note that the response template should be no longer than **12 pages** (excluding the cover sheets) and this will be observed by SG when assessing the templates.
- Step 4** Discuss the template with SG housing and planning officials if that is useful.
- Step 5** The response template should be signed-off by the Head of Housing and the Head of Planning or the equivalent senior official from each department.
- Step 6** Submit the completed response template to the SG for consideration using the mailbox (NPF4housingland@gov.scot).

TEMPLATE PART 1 – Household Projections (Newly-Forming Households)

Instructions

The Scottish Government's initial default estimates use the NRS 2018-based principal household projections (equivalent to step 1 of the HNDA Tool). Alternative household projections are available including the NRS low migration variant and high migration variant. Some authorities also produce household projections in-house and authorities can consider the use of these where they can make a robust case for this.

Use the space below to provide evidence for the use of an alternative household projection. This must explain how the housing completions data provided by the Scottish Government has been considered. It must also include the actual household projections that you wish to use. Where necessary, tables of figures can be provided in an Annex.

Take no more than the 2 pages.

Fife Council response

Fife Council agree with Scottish Government's use of the NRS 2018-based principal household projections (equivalent to step 1 of the HNDA Tool).

However, we have concerns that the completion levels listed in the Scottish Government master Excel Spreadsheet differ from, and do not reflect, the Fife Council figures published within the Housing Land Audit 2019 (as shown below). We note that the two different processes (Building Standards returns and Housing Land Audit) are used for different purposes. From a planning perspective, we take completions data from the Housing Land Audit (which is prepared in consultation with the house building industry and Homes for Scotland).

Completions by Housing Market Area 2009/10 – 2018/19

Housing Market Area/Year	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	AVERAGE 09_10 to 18_19
Dunfermline and West Fife	492	431	480	536	520	495	503	573	550	696	528
Kirkcaldy, Glenrothes and Central Fife	425	385	161	228	115	147	195	483	568	362	307
St Andrews and North East Fife ¹	43	30	93	94	114	148	212				105

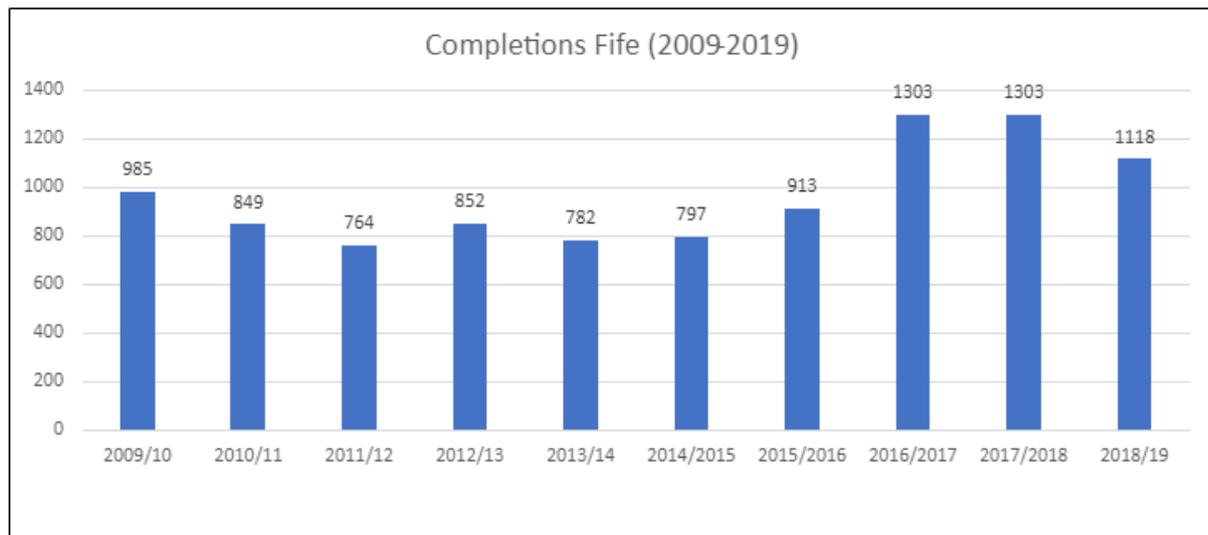
Housing Market Area/Year	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	AVERAGE 09_10 to 18_19
St Andrews and East Fife								196	118	34	116
Greater Dundee (Fife)								0	2	3	2
Cupar and North West Fife	25	3	30	4	33	7	4	51	65	23	25
Fife	985	849	764	862	782	797	914	1303	1303	1118	968

(Source: Housing Land Audit 2109)

Notes:

¹ TAYplan 2 introduced the Greater Dundee HMA, part of which is in North Fife. The St Andrews & North East Fife HMA was subsequently split to form the Greater Dundee (Fife) HMA and St Andrews & East Fife HMA.

Completions Fife 2009/10 – 2018/19



(Source: Housing Land Audit 2019)

(see page 4 of the Guidance Note)

TEMPLATE PART 2 – Existing Housing Need

Instructions

The Scottish Government's initial default estimates include an estimate of existing housing need (equivalent to step 2 of the HNDA Tool). This includes homeless households in temporary accommodation and households who are *both* overcrowded *and* concealed.

Use the space below to provide robust evidence for the use an alternative existing housing need figure. This must explain how the housing completions data provided by the Scottish Government have been considered. This must also include the existing housing need figure that you wish to use. Where necessary tables of figures can be provided in an Annex.

Take no more than the 2 pages.

Fife Council response

The existing housing need figure provided for Fife is derived from on-going work to update respective Housing Need and Demand Assessments for Edinburgh and South-East Scotland and Tay Cities. The figures present the net need for social rented housing which will populate the Scottish Government HNDA Tool:

	Fife (West & Central) / South East Scotland	Fife (North) / Tay Cities	Fife Total
Homeless / Temporary	1,295	441	1,736
Both Overcrowded and Concealed	171	157	328
Support needs / Special forms of housing	263	70	333
Total existing housing need	1,729	668	2,397*

*The above existing housing need figure for Fife will be rounded to 2,400

Fife (West & Central) / South-East Scotland:

Homeless / Temporary- the Covid-19 pandemic has led to significantly increased statutory homeless cases, not reflected in the NPF4 data which is based on 31st March 2020 data. Historically around 70% of statutory homeless customers make their own arrangements with a minority 30% using temporary accommodation. The data has therefore been based on Homelessness HLI 'live cases' at 31st March 2021 showing 1,717 households. Two deductions were made from this figure to reflect a past trend that 4.67% of homeless customers will secure accommodation in private housing; and to show that 79.13% of Fife cases will fall within South-East Scotland (i.e. $1,717 - 4.67\% (80) = 1,637 * 79.13\% = 1,295$).

Overcrowded and concealed – Scottish Government HNDA Tool data was used for this indicator for Fife (215 households), uprated to reflect more recent SHCS 2017-19 household data (216 households) with a deduction to show that 79.13% of Fife cases will fall within South-East Scotland (i.e. $216 \times 79.13\% = 171$ households).

Support needs / Special forms of housing - There were 15,780 applicants on the Fife Housing Register at 31st March 2021. Of these, 332 have high priority (over 100 points) with a specialist medical, support requirement or physical disability. All have applied for either wheelchair, extra care or retirement housing of which there is a low supply / turnover in parts of Fife. All are currently living outwith the social rented sector so a move will not create a net vacancy in social housing. A deduction was made to show that 79.13% of Fife cases will fall within South-East Scotland (i.e. $332 \text{ households} \times 79.13\% = 263$ households)

Fife (North) / Tay Cities

Homeless / Temporary – based on temporary accommodation stock figure for North-East Fife (124) plus figures for households under threat of eviction / repossession derived from 2021 TAYplan HNDA Survey Q18: Main reasons why you would like OR need to move at present: (5) Home temporary; (17) Evicted by landlord; (18) Thrown out by relatives/friends (317) (i.e. $124 + 317 = 441$ households).

Overcrowded and concealed – cross-tabulation of 2021 TAYplan HNDA Survey Q5: Does your household share any rooms with any other person or household? IF YES, which rooms? (2) Kitchen; (3) Bathroom; (4) WC; (5) Other and Q18: Main reasons why you would like OR need to move at present? (1) Overcrowded (double-counting removed) (157 households).

Support needs / Special forms of housing - Fife Housing Register at 31st March 2021 – calculated as outlined in the **Fife (West & Central) / South-East Scotland figures**.

Comparison to Past Completions (n.b. figures rounded to nearest 50)

The minimum all-tenure housing land requirement of 7,350 compares to 12,016 house completions from 2020-2019:

	Existing Housing Need	Newly Arising Need	25% Flexibility Allowance	Minimum All-Tenure Housing Land Requirement	Housing Completions 2010-2019
Total	2,400	3,450	1,500	7,350	12,016

(see page 4 & 5 of the Guidance Note)

TEMPLATE PART 3 – Flexibility Allowance

Instructions

The Scottish Government's initial default estimates include the addition of a 25 per cent flexibility allowance for urban areas and 30 per cent for rural areas. This is to provide a contingency or over programming of land to allow for changes in sites coming forward over the 10-year time frame of the local development plan.

Use the space below to provide evidence for the use of an alternative flexibility allowance, which should generally be no less than those provided. This must explain how the housing completions data provided by the Scottish Government has been considered. It must also include the percentage flexibility allowance that you wish to use.

Fife Council response

Fife Council accept the Scottish Government's flexibility allowance levels given Fife's mix of urban and rural areas and varied levels of housing market activity.

(see page 5 of the Guidance Note)

TEMPLATE PART 4 – Locally Adjusted Estimate of Minimum All Tenure Housing Land Requirement

Instructions

The Excel Calculator must be used to produce a locally adjusted estimate of the minimum all-tenure housing land requirement. The initial default and adjusted estimates must be provided below.

Initial Default Estimate = 5,250

Adjusted Estimate = 7,350

A copy of the adjusted Excel Calculator has been submitted with this response template.

When inputting data into the Excel spreadsheet an error has occurred where 200 units of the Existing Housing Need and total Housing Land Requirement are being moved from North Fife to Central/South of Fife, we believe that this is an error in the spreadsheets formatting. Therefore, to avoid any confusion we have provided a copy of the correct figure in the template below, the figures in red indicate the Scottish Government default figures.

Unitary Local Authorities, City Regions and National Parks	NPF4 - Minimum All Tenure Housing Land Requirement				Housing Completions
	10 Years Total				
	Existing Housing Need	Newly-Forming Households	Flexibility Allowance (25%)	Minimum All Tenure Hsg Land Requirement	2010 – 2019
Fife (North)	650 (150)	700 (700)	350 (200)	1,700 (1,050)	2,403 (2,403)
Fife (Central/South)	1,750 (600)	2,750 (2,750)	1,150 (850)	5,650 (4,200)	9,613 (9,613)
All Fife	2,400 (750)	3,450 (3,450)	1,500 (1,050)	7,350 (5,250)	12,016 (12,016)

(see page 5 of the Guidance Note)

TEMPLATE PART 5 – Housing Market Partnership (HMP) and Stakeholder Involvement

Instructions

Use the space provided below to list the HMP membership, provide a summary of their views and an indication of whether the HMP has agreed the locally adjusted estimate of the minimum all-tenure housing land requirement. Also provide a list of additional stakeholders and a summary of their views. Use the sub-headings provided.

Take no more than 4 pages.

(see page 6 of the Guidance Note)

Fife Council response

List of Additional Stakeholders

Fife Council Officers (Housing, Planning, Economy & Protective Services)
16 x Private Developers
Homes for Scotland
19 x Fife RSLs
Fife Housing Association Alliance
Forestry Commission Scotland
Scottish Land & Estates
Fife Housing Partnership (NHS Fife, Fife Council, RSL's, Fife tenants Forum, Frontline Fife, Cosy Kingdom Partnership & Scottish Landlords)

Summary of Stakeholders Views

There is a general view of the initial default minimum all-tenure housing land requirement figures being low and not reflective of the housing delivery requirements for both the Tay Cities and South East Scotland regions of Fife. The figures provided create a negative position for housing delivery which will diminish choice and constrain the supply of housing (including affordable housing) and could seriously impact of the future economic growth of Scotland.

There is a request for the Scottish Government and Housing Services 10-year affordable housing target to be considered for the delivery of affordable housing to ensure there is no disconnection through the setting of a minimum target.

Concerns are raised around household projections being 2018 based and the risk of relying on past trends to estimate future household formation when the last census was so long ago. Figures do not reflect reality and do not tend to provide a good basis for estimates of newly forming households to be planned for. It has been suggested that current completion levels (2019) should be used as a starting point. As there is evidence of growth each year between 2010 and 2019, using an average from this period would not be suitable.

Summary of findings from the Tayside NPF4 stakeholder engagement event attached.

HMP agreement

Has the HMP agreed your minimum housing land figure?

NO

If not, please explain any disputes - see attached Committee report

Homes for Scotland (HFS) believe the minimum HLRs for NPF4 should be set at levels that support the delivery of at least 25,000 homes of all-tenures each year in line with the Scottish Government objective of delivering more homes. This represents a 10.6% increase on the 22,596 homes built in Scotland in 2019. However, in applying this to local authorities they have simply proportionally uplifted the total number of homes delivered in each authority in 2019 by 10.6%. This approach does not take into account the peaks and troughs associated with housing delivery between different years and across longer periods of time. It thus inflates housing need in some authorities and increases it in others, and is therefore not endorsed by officers of Fife Council. For reference their approach would result in a housing requirement of 1,630 net additional homes per annum across Fife.

TEMPLATE PART 6 – Joint Housing and Planning Senior Official Sign-Off

Instructions

This template should be agreed and signed-off, jointly, by the Head of Housing and the Head of Planning or the equivalent senior official from each department. Typed signatures can be provided.

Take no more than 1 page.

(see page 6 of the Guidance Note)

Head of Housing

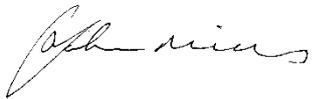
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Date: 23/06/21

Signature:



Head of Planning

Full Name: Pam Ewen

Full Title: Head of Planning

Email: pam.ewen@fife.gov.uk

Date: 23/06/21

Signature:

