

Orkney Islands Council Response to Scottish Government's Consultation on Minimum All Tenure Housing Land Requirement for National Planning Framework 4

May 2021

Introduction Statement

Orkney Islands Council formerly reserve the right to comment on this figure at a more appropriate time that is in line with the timescales for the drafting of Orkney's next Local Development Plan (LDP) where evidence on the County's housing land requirements will be evidenced through a robust and up to date Housing Needs and Demand Assessment and by the Local Development Plan's Evidence Report.

This summer we will commence the review of the LDP and we do not consider that we will be in a position to have fully evidenced our housing need for until early 2023; if timescales for the publication of secondly legislation on development planning and National Planning Framework 4 (NPF4) remain on track.

In addition to this, the Council is making this comment without full knowledge of the national housing policies that the Scottish Government will be placing in NPF4 that will also include national policies on the repopulation of rural Scotland. Orkney Islands Council has been classed by the Scottish Government as a rural authority.

We request evidence that an Islands Community Impact assessment has been completed on this consultation.

The Statistics for Orkney within this Consultation

The Scottish Government's National Planning Framework 4 Minimum All Tenure Housing Land Requirement Housing Land has estimated for Orkney as an additional 450 properties over the next 10 years. We consider this figure to be very low when compared with previous 10-year period where 1,450 houses have been completed. We are concerned about how this figure has been calculated.

The Scottish Government have estimated that 50 households are currently in housing need. The estimates also include an additional 300 emerging households over the 10-year period. A flexibility allowance of 30%, 100 properties, has been added giving a total of 450 properties needed for Orkney over the next 10 years.

The Council's initial assessment of our housing needs that we can evidence is much closer to 1,000, when considering the need over the last two decades.

In terms of existing need, the Housing Needs and Demand Assessment utilises the number of households on the social housing waiting list that have a priority pass for social housing as a figure for existing need. The Council do not believe by any means that this figure covers all households currently in housing need, however, it is a figure that can easily be evidenced and defended. The current waiting list has 849 households, 250 of which have a priority pass for rehousing. This is 200 more than the Scottish Government estimate.

The 300 figure for emerging households is considered by the Council to be roughly accurate.

The consultation has not considered figures for migration. Orkney has had a positive net in migration figure for much of the last two decades. The National Records of Scotland 2018/19 Mid-Year Population Estimates show that between 2009 and 2019 1,440 more people moved to Orkney than moved away from Orkney. With an average household size of just over two people this figure represents around 70 households a year on average. The Council expects this trend to continue over the coming years that will continue to buck the trends of the National Records of Scotland Population projections which have over recent years projected a decrease in Orkney's population.

Should net in migration remain positive and continue at levels of around 70 households a year the pressure on the housing market will continue to increase as these households will also require to be housed. The calculations used within this consultation do not take account of this evidence. These figures have been missed and it is estimated that this group for a 10-year period could make up as many as 700 households.

With the global pandemic, Orkney has seen increased inward migration as working from home through digital working has become the norm. If this trend continues as the Country emerges from the pandemic this is another reason why net in migration needs to be considered.

The Scottish Government's drive to repopulate Rural Scotland has entirely ignored Orkney's figures for net in migration. All areas of Rural Scotland are different in their population requirements. For example, the Outer Hebrides actively try to increase their population, while Orkney is looking to address our demographic balance by attracting and retaining more young people. Therefore, the All Tenure Housing Land Requirement Housing Land should not just blanketly cover this with a 30% flexibility but consider migration statistics and engage with each rural authority on their individual population issues.

The Council's evidence considers utilising totals to include 250 households in existing need, up to 1,000 households either newly forming (300) or from net in migration (700) and a 30% flexibility figure of 350, giving a much higher figure of 1,600 properties required over the next 10 years. Orkney's figure needs to be comparable to the number of properties that have been developed in each of the last two decades.

Conclusion

This consultation has focused on the uniformity of housing figures nationally and has not considered the unique character of Orkney's population statistics and housing supply requirements. We request additional consultation with the Scottish Government on this matter and clarification that we can consider this figure at a time that is more relevant to the drafting of Orkney's next Local Development Plan.