



The Strategic Development Planning Authority
for Edinburgh and South East Scotland

Date 29th April 2021

Dear Sir / Madam

NATIONAL PLANNING FRAMEWORK 4 –MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT FOR THE LOCAL AUTHORITIES IN THE SOUTH EAST SCOTLAND REGION

You will be aware of the Scottish Government’s work on National Planning Framework 4 including the proposed methodology and default minimum housing land requirements.

As part of the collaborative process on this work, there needs to be consideration of local input to those figures and the Council has been working to understand the factors at play here. Local input should include policy initiatives and ambitions to support growth in housing provision. As a key stakeholder in South East Scotland Housing your views are important in responding to this consultation.

You may have already been consulted on these figures by West Lothian Council and Fife Council, with Fife Council’s consultation also covering the all tenure housing land requirements for the Tay Cities region. If you are intending to respond to West Lothian or Fife Councils separately there is no need to include any comments specific to those areas.

As a first stage in this process, Scottish Government has published initial default housing estimates to inform the identification of a minimum all-tenure housing land requirement for individual local authority areas. Responses to this consultation are expected by 4 June 2021. For information the consultation papers published by Scottish Government are available to download from the following link, under the Housing drop-down:

<https://www.transformingplanning.scot/national-planning-framework/resources/>

The all tenure minimum Housing Requirements contained within the Scottish Government consultation are as follows:

Local Authority	NPF4 - Minimum All Tenure Housing Land Requirement			
	10 Years Total			
	Existing Housing Need	Newly-Forming Households	Flexibility Allowance (25% urban, 30% Rural)	Minimum All Tenure Housing Land Requirement
City of Edinburgh	2,150	19,900	5,500	27,550
East Lothian	500	4,350	1,200	6,050
Fife (Central and South)	600	2,750	850	4,200
Midlothian	500	5,950	1,600	8,050
West Lothian	600	6,500	1,750	8,850
Scottish Borders	100	1,250	400	1,750

Extract from the Scottish Government NPF4 all tenure Housing consultation

Councils are asked to consider whether there is local evidence and policy ambition for a locally adjusted housing estimate to replace the default figures and are asked to work with Housing Market Partnerships and other interested stakeholders to provide a considered view.

As a key stakeholder and member of the Housing Market Partnership we invite you to send us your initial views on the default all-tenure housing land requirement figures published by Scottish Government.

It would also be useful to have your suggestions of valid inputs to the calculation of alternative locally adjusted figures. Your comments on these key points, and any other thoughts on the process, are appreciated. In particular we would like you consider the following points:

1. Household formation projections these are taken from the 2018 figures and average 1990 households per annum – do you have any evidence or reason to propose lower or higher figures for the projections across the six local authorities?
2. Existing housing need – Do you have any reason or evidence to propose a lower or higher figure for this?
3. Flexibility - as the methodology is to capture housing land, a flexibility allowance of 25% is given as a minimum for urban areas and 30% for rural areas. Do you consider that the flexibility allowance should be greater or lower than the proposed 25/30% and if there is any variance, the reasons for this?

Consideration can also include reference to completion levels. Average completion rates, taken from the Councils Housing Land Audits are as follows:

Local Authority	Average completions 2010 – 2019
City of Edinburgh	2015
East Lothian	562
Fife (Central and South)	835 (968 including North Fife)
Midlothian	560
West Lothian	677
Scottish Borders	330

All tenure housing completions 2010 – 2019, taken from Local Authority Housing Land Audits

Given the reporting timelines for feedback to the Scottish Government and for reporting to Council Committees, feedback is needed on a very short timescale. **Please return responses to ldp@eastlothian.gov.uk by Monday 10th May 2021.**

We look forward to hearing from you.

Yours faithfully



Robin Edgar

Team Manager, East Lothian Council

(Acting SESplan Manager)