

# **National Planning Framework 4**

## **Minimum All-Tenure Housing Land Requirement**

### **RESPONSE TEMPLATE**

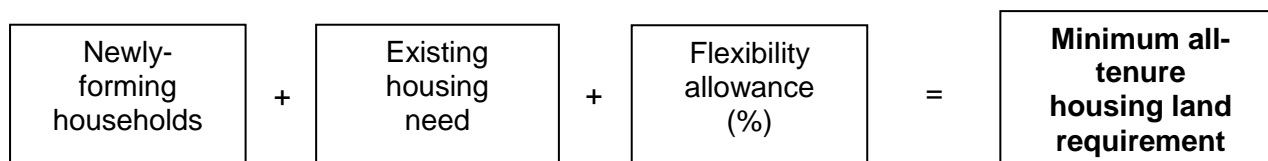
**Scottish Government**

**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](mailto: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](mailto: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.** ([see page 4 of the Guidance Note](#))

### **West Lothian Council's Response**

West Lothian Council considers the Scottish Government's initial default estimate based on the NRS 2018-based principal household projections of **6,500** newly formed households is appropriate and do not propose an alternative figure.

The Scottish Government data for completions between 2010 – 2019 is **6,658**. This is comparable with the default figure of **6,500** of newly formed households and suggests in the context of West Lothian's large supply of effective housing land, that this is what the market can sustain.

Raw data from National Registers of Scotland (NRS) 2018 based household projections suggest a yearly increase in newly formed households between 2022 and 2037. The data also suggests that the trend of increased newly formed households is slowing. It is noted that page 2 of the method paper outlines that the latest 2018-based household projections are lower than the previous 2016-based projections as a result of falling birth rates, a fall in projected migration and a stalling in improvement in life expectancy. The council does not dispute these generic assumptions.

## 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.** ([see page 4 & 5 of the Guidance Note](#))

### **West Lothian Council's Response**

The default figure provided by Scottish Government for existing need is **582** based on;

1. A count of concealed and overcrowded households using the 2011 Census and uprated to the Scottish Household Statistics (2016-2018) estimates. Bespoke analysis by Scottish Government in 2020.
2. Total Households in Temporary Accommodation at 31 March 2020  
Homelessness in Scotland: 2019 to 2020 - gov.scot ([www.gov.scot](http://www.gov.scot))

This figure is then rounded to the nearest 50 in accordance with Annex N: Step 14, which bring it to **600**.

Based on a local analysis of need and the current number of live cases the council suggests that the figure should be **1,219**, which rounded to the nearest 50 gives a figure of **1,200**. Housing colleagues have provided what they consider to be the most appropriate data to reflect the existing need, which can be seen in table 1 below;

**Table 1: Breakdown of existing need figures**

Scottish Government, Homelessness HL1 'live' cases at 31st March 2021	<b>1,080</b>
Concealed and Overcrowded households from the Census (2011) Uprated to the (SHS 2017-2019) estimates	<b>1,39</b>
<b>TOTAL</b>	<b>1,219</b>
Rounded to the nearest 50	<b>1,200</b>

### Comparison with past completion data

The completion data provided shows that between 2010 – 2019 there were 6,658 completions in West Lothian.

The figure resulting from stage 1 (newly formed households) and stage 2 (existing housing need) is 7,700. This suggests that the calculated requirement going forward will be greater than past demand (on the assumption that there was no constraint in the market) and that is before the 25% flexibility allowance is added. Notwithstanding the figure of 7,700 is broadly consistent with the council's planning assumptions and is accepted as appropriate by the council.

It will be important going forward to maintain a clear distinction between the All Tenure Housing Requirement and the Five Year effective Land Supply as one identifies land requirements and the other identifies the need for completions. It will be important to ensure that this matter is clear in NPF4 and the revised Scottish Planning Policy.

## **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.

**Take no more than the 2 pages.** ([see page 5 of the Guidance Note](#))

### **West Lothian Council's Response**

West Lothian Council do not propose to alter the 25% flexibility allowance proposed by Scottish Government.

A comparison of the Scottish Government's initial default estimate of the minimum all-tenure 10-year housing land requirement with West Lothian's locally adjusted is shown in Annex A, table 2. As it is proposed to double the existing need figure from 600 to 1,200, the flexibility figure has also increased from 1,750 to 1,900.

The locally adjusted all-tenure Minimum housing land requirement is in excess of past completions data and is in excess of the Scottish Government's initial default estimate. As indicated earlier a clear distinction should be maintained between the All Tenure Housing Requirement and the Five Year effective Land Supply as one identifies land requirements and the other identifies the need for completions. The flexibility allowance set out here should not be applied to the 5 year effective housing land requirement. It will be important to ensure that this matter is clear in NPF4 and the revised Scottish Planning Policy.

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

The Excel Calculator produce a locally adjusted estimate of the minimum all-tenure housing land requirement as noted below.

Initial Default Estimate       = **8,850**

Adjusted Estimate               = **9,600**

A copy of the adjusted Excel Calculator is provided with the response.

*(see page 5 of the Guidance Note)*



ANNEX A

**Table 1: Raw data from the National Records of Scotland 2018 Household Projections**

	2022	2023	2024	2025	2026	2027	2028	2029
2018 Principal	81,415	82,214	82,991	83,688	84,357	85,008	85,634	86,267
2018 Principal Change	799	777	697	669	651	626	633	575

	2030	2031	2032	2033	2034	2035	2036	2037
2018 Principal	86,842	87,463	88,049	88,657	89,312	89,903	90,530	91,130
2018 Principal Change	621	586	608	655	591	627	600	585

**Table 2: Comparison of initial and locally-adjusted minimum all-tenure housing land requirement.**

	Existing need	Newly formed households	Flexibility allowance (25%)	Minimum housing land requirement	Completions (2010 – 2019)
Scottish Government initial default figures	600	6,500	1,750	8,850	6,658
West Lothian Council adjusted figures	1,200	6,500	1,900	9,600	6,658

## 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](#))

### **West Lothian Council's Response**

#### List of HMP members

Homes for Scotland  
Full list of consultees is listed in Annex B.

#### Summary of HMP views

##### Homes for Scotland

Homes for Scotland propose a Minimum All-Tenure Housing Land Requirement (MATHLR) figure of **15,808**. This is a significant increase of the council's proposed MATHLR figure of **9,600**.

This figure has been calculated by Homes for Scotland on the following basis.

In 2019, WLC delivered 1,143 homes, which is 5.06% of the Scotland wide completion figures (22,596) for that year.

HFS's policy aspiration is to deliver 25,000 all-tenure housing per year over the 10-year period.

By utilising the same 5.06% share from 2019 this would require WLC to provide **12,646** homes over the period.

A 25% flexibility allowance is then applied, to bring the figure to **15,808**.

HFS's proposed methodology represents a significant deviation from Scottish Government methodology that has been through a thorough consultation and is considered flawed for a number of reasons. In particular, the approach is based on completion rates over a single year rather than the average completions over a longer period. The 2019 completion rate in West Lothian is inflated as a result of the

significant (but one-off) increase in the number of completions from the council's own house building programme that year.

The proposed figure is over twice the amount of the completions achieved between 2010 and 2019 and would, when annualised, provide for a level of housing completions well beyond anything which has been achieved in the past.

#### HMP agreement

Has the HMP agreed your minimum housing land figure?

No – Confirmation of reasons is awaited.

#### List of Additional Stakeholders

West Lothian Council is undertaking a Housing Needs and Demand Assessment in conjunction with the City of Edinburgh, East Lothian, Midlothian, Scottish Borders and Fife (part). Unfortunately, due to the timescales involved to seek West Lothian Council member approval in order to submit a response by 4<sup>th</sup> June, it has not been possible to collaborate with other authorities in its fullest sense.

#### Summary of Stakeholders Views

Responses from the housing market partnership are due back 10<sup>th</sup> May. Summary of views to be updated once the responses have been received.

## **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](#))

### **West Lothian Council's Response**

#### Head of Housing

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Full Title: Head of Housing, Customer and Building services

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Date: 3 June 2021

Signature: AnnMarie Carr

#### Head of Planning

Full Name: Craig McCorrison

Full Title: Head of Planning, Economic Development and Regeneration

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Date: 19 May 2021

Signature: Craig McCorrison

## Annex B

List of Housing Market Partnership that have been consulted.

<b>Name</b>	<b>Organisation</b>	<b>Email address</b>
Tammy Swift-Adams	Homes for Scotland	T.Swift-Adams@homesforscotland.com
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Michael Curran	Health & Social Care Partnership / Physical Disability Reference Group	<a href="mailto:mcurran@scotborders.gov.uk">mcurran@scotborders.gov.uk</a>
Margaret Simpson	Health & Social Care Partnership / Physical Disability Reference Group	<a href="mailto:margaret@sbsec.org.uk">margaret@sbsec.org.uk</a>
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Cllr Richard Watt	Fife Council	<a href="mailto:cllr.richard.watt@fife.gov.uk">cllr.richard.watt@fife.gov.uk</a>
East Fife Federation	East Fife Federation	<a href="mailto:eastfifefederation@msn.com">eastfifefederation@msn.com</a>
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Gerry McDougall	Alba Investments	<a href="mailto:gerry.mcdougall@redmail.com">gerry.mcdougall@redmail.com</a>
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