

# **National Planning Framework 4**

**Fife**

**Minimum All-Tenure Housing Land Requirement**

**ASSESSMENT REPORT**

**Scottish Government**

**Planning & Architecture Division and Housing & Social Justice**

**September 2021**

## CORE OUTPUTS ASSESSMENT

### 1 Locally Adjusted Estimate

	Initial Default Estimate	Locally Adjusted Estimate
Fife North	1,050	1,700
Fife Central and South	4,200	5,650
<b>Fife</b>	<b>5,250</b>	<b>7,350</b>

The locally adjusted estimate (1,700) for Fife North has been considered against the Council's Housing Land Audit completions figures (1,330). The Scottish Government 10 year completions figure for Fife North is 2,403 ([Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot \(www.gov.scot\)](http://www.gov.scot)).

Fife Central and South presents an adjusted estimate of 5,650. This is significantly below the Housing Land Audit 10 year completions of 8,350 and the Scottish Government completions for the area (9,613) ([Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot \(www.gov.scot\)](http://www.gov.scot)).

### 2 Household Projections (Newly-Forming Households)

The National Records of Scotland (NRS) 2018-based principal household projection has been used by the Council and no adjustment is proposed. The single year data is generated correctly within the Excel calculator.

#### Household Projection: Default Compared to Adjusted Estimates

	Default	Adjusted
Fife North	700	700
Fife Central and South	2,750	2,750
<b>Fife</b>	<b>3,450</b>	<b>3,450</b>

### 3 Existing Housing Need

#### Existing Housing Need: Default Compared to Adjusted Estimates

	Default	Adjusted
Fife North	150	650
Fife (Central and South)	600	1,750
<b>Fife</b>	<b>750</b>	<b>2,400</b>

	<p>The TAYplan authorities invited Arniel Johnston to assist in their next Housing Need and Demand Assessment (HNDA) including alternative existing housing need estimates. The estimates were produced using a household survey carried out online and by telephone with around 2,100 interviews being undertaken. The methodology used took account of the need to avoid double counting and to ensure the sample is statistically robust.</p> <p>The proposed existing housing need figures are derived from five elements:</p> <ul style="list-style-type: none"> <li>• Homeless households and those in temporary accommodation: the authority note that the pandemic has led to significantly increased statutory homeless cases, not reflected in the initial default estimate data which is based on 31 March 2020 data</li> <li>• Concealed and overcrowded</li> <li>• Waiting list information relates to specialist housing</li> </ul> <p>The use of these element results in existing housing need estimates that are substantially higher than the default figures.</p>
<p><b>4</b></p>	<p><b>Flexibility Allowance</b></p> <p>Fife use the default flexibility allowance of 25%.</p>

<b>CORE PROCESSES ASSESSMENT</b>	
<p><b>1</b></p>	<p><b>Using the Response Template and Excel Calculator</b></p> <p>The Response Template has been used to make the case for change, word limits have been slightly exceeded with addition of a covering letter. The template is completed correctly.</p> <p>The Council has submitted a copy of the adjusted Excel calculator. However, it has said there is an error in the default formula for splitting the existing housing need between Fife North and Fife Central and South. The authority have provided the relevant information in the template response. The newly-forming household split formula is the same however no error has been identified here.</p>
<p><b>2</b></p>	<p><b>Housing Market Partnership (HMP) and Stakeholders Involvement</b></p> <p>The HMP and stakeholders were made up of Council officers, private developers, Homes for Scotland, Fife Housing Partnership and other interested parties.</p>

	<p>There is a general view of the initial default estimate figures being low and not reflective of the housing delivery requirements. Concerns are raised around household projections being 2018-based and the risk of relying on past trends to estimate future household formation.</p> <p>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.</p> <p>Homes for Scotland believe the estimate should be set at levels that support the delivery of at least 25,000 homes of all-tenures each year across Scotland. This represents a 10.6% increase on the 22,596 homes built in Scotland in 2019. In applying this to local authorities Homes for Scotland have proportionally uplifted the total number of homes delivered in each authority in 2019 by 10.6%. Other HMP members and stakeholders believe that this approach does not take into account the peaks and troughs associated with housing delivery and inflates housing need in some authorities.</p> <p>The locally adjusted estimate was not be agreed by the HMP.</p>
<p><b>3</b></p>	<p><b>Joint Housing and Planning Senior Official Sign-Off</b></p> <p>Full sign-off by heads of planning and housing for Fife Council.</p>
<p><b>4</b></p>	<p><b>Statistical Evidence</b></p> <p>The Council has used some robust sources of statistical evidence to support their case including:</p> <ul style="list-style-type: none"> <li>• NRS 2018-based household projection</li> <li>• Scottish Government homelessness data</li> <li>• Scottish Government of <i>both</i> concealed <i>and</i> overcrowded households</li> </ul> <p>They have also used some recognised local data sources including:</p> <ul style="list-style-type: none"> <li>• Fife Housing Register</li> </ul> <p>And they have also used findings from a local HNDA Survey. The Council gives reasons for the use of their Housing Land Audit completions data over the SG default figures, however this does not make clear why they believe the Housing Land Audit figures to be more robust.</p>
<p><b>5</b></p>	<p><b>Policy Evidence</b></p> <p>Fife Council indicate that there is on-going work to update the HNDA(3) for Edinburgh and South-East Scotland and Tay Cities.</p>

A report of the stakeholder consultation event was provided alongside the Response Template and calculator. It highlights a number of drivers that have been factored into considerations, including reference to the Scottish Government affordable home target, Housing to 2040, the current Strategic Housing Investment Plan (SHIP), infrastructure provision, the pandemic and the level of investment through the Tay Cities Deal.

### **MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)**

For the reasons specified above the proposed MATHLR is:

	<b>MATHLR</b>
<b>Fife North</b>	1,700
<b>Fife (Central and South)</b>	5,650
<b>Fife</b>	<b>7,350</b>