

# **National Planning Framework 4**

**West Lothian**

**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

	<b>Initial Default Estimate</b>	<b>Locally Adjusted Estimate</b>
West Lothian	8,850	9,600

Whilst the locally adjusted estimate (9,600) is primarily driven by the household projections (6,500), the change from the initial default estimate is driven by the changes to existing housing need (from 600 to 1,200).

The locally adjusted estimate (increased from an initial default estimate of 8,850) is significantly above the 10 year Scottish Government completions of 6,568 set out in the initial default estimate ([Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/housing-statistics-quarterly-update-new-housebuilding-and-affordable-housing-supply/pages/1-10-year-completions.aspx)).

The authority note that the figure comprised of newly formed households and housing need (7,700) is greater than past demand. They say that notwithstanding this, the figure is broadly consistent with the authority's planning assumptions and is accepted as appropriate.

The Scottish Government completions figure quoted in the Response Template is '6,658'. The correct figure is 6,568.

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

The National Records of Scotland (NRS) 2018-based principal migration variant has been used by the council and no alternative is proposed. The single year data is generated correctly within the Excel calculator.

The household projection remains 6,477. The authority indicate this suggests in the context of West Lothian's large supply of effective housing land, that this is what the market can sustain. They refer that whilst NRS projections suggest a yearly increase between 2022 and 2037, that trend is slowing. The authority highlights the reasons for the change between 2016 and 2018 projections – falling birth rates, fall in projected migrations and stalling in life expectancy - and does not dispute them.

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

	<b>Default</b>	<b>Adjusted</b>
West Lothian	6,500	6,500

	<b>Existing Housing Need</b>	
<b>3</b>	<b>Existing Housing Need: Default Compared to Adjusted Estimates</b>	
	<b>Default</b>	<b>Adjusted</b>
	600	1,200
	<p>Based on local analysis, the Council propose alternative existing housing need information which includes:</p> <ul style="list-style-type: none"> <li>• A count of homelessness 'live' cases at 31<sup>st</sup> March 2021 (Scottish Government homelessness data)</li> <li>• An estimate of concealed <i>and</i> overcrowded household (SG estimate based on 2011 Census and Scottish Household Survey 2017-19)</li> </ul> <p>West Lothian Council suggests a broader identification of homelessness through HL1 cases.</p> <p>The Council provided no reasoning for its choice of an alternative estimate and it is not clear if all the 'live' cases of homelessness would need to be met through a new unit of housing or if some could be met in-situ using the existing housing stock. The most recent SG estimate of concealed <i>and</i> overcrowded household is based on the Scottish Household Survey (2016-18) and the estimate is 137. The estimate by the council is 139 and for a different time period.</p>	
<b>4</b>	<b>Flexibility Allowance</b>	
	West Lothian use the default flexibility allowance of 25%.	

<b>CORE PROCESSES ASSESSMENT</b>	
<b>1</b>	<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 are not exceeded and its completion is correct. A copy of the adjusted Excel Calculator has been provided.</p>
<b>2</b>	<p><b>Housing Market Partnership and Stakeholders Involvement</b></p> <p>The HMP (made up of council, adjacent councils, health partnership, RSLs, consultants, private developers and Homes for Scotland) considered the Homes for Scotland's proposed methodology to establish a housing land requirement to be flawed. In particular, the approach is based on completion rates over a single year rather than the average completions over a longer period. The 2019</p>

	<p>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 for that year.</p> <p>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.</p> <p>The HMP did not agree the adjusted estimate although confirmation of the reason was awaited.</p>
<b>3</b>	<p><b>Joint Housing and Planning Senior Official Sign-Off</b></p> <p>Senior planning and housing officers have signed-off the submission.</p>
<b>4</b>	<p><b>Statistical Evidence</b></p> <p>The Council have used well recognised sources of statistical evidence to support their case including:</p> <ul style="list-style-type: none"> <li>• NRS, 2018-based household projections (principal)</li> <li>• Scottish Government estimate of concealed <i>and</i> overcrowded households</li> <li>• Scottish Government 'live' homelessness cases</li> </ul>
<b>5</b>	<p><b>Policy Evidence</b></p> <p>The authority note that they are undertaking a Housing Needs and Demand Assessment in conjunction with other authorities in the South East of Scotland.</p>

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

For the reasons specified above the proposed MATHLR is:

	<b>MATHLR</b>
<b>West Lothian</b>	<b>9,600</b>