EIR Response Annex

Freedom of Information request regarding large-scale housing developments in Edinburgh and surrounding areas, specifically focusing on developments in Winchburgh, East Lothian, and Midlothian.
MiCase Ref: 202500480494

COMPLETED HOUSING DEVELOPMENTS (2015-2024):

1. Total number of residential units completed in:

• Winchburgh development
The Scottish Government collects data from Local Authorities on all house building sites in Scotland and publishes statistics on house building starts and completions, at the Local Authority level. Although all developments in Winchburgh are included in the data for West Lothian, it would require additional manual work to accurately identify which specific sites are in Winchburgh, based on site address information. This additional analysis has not been completed and is not readily available.

An excel version of West Lothian Council's 2024 Housing Land Audit (HLA) can be downloaded from this page (Housing Land Audit (HLA) - West Lothian Council), and the sites that make up Winchburgh Housing Market Area are all listed in full detail on the second page ("2- Effective Supply").

• East Lothian council area
Information of residential completions by Local Authority and Tenure, is published by the Scottish Government as part of "Housing Statistics for Scotland Quarterly Update":
Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot

• Midlothian council area
Information of residential completions by Local Authority and Tenure, is published by the Scottish Government as part of "Housing Statistics for Scotland Quarterly Update":
Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot

• Edinburgh city boundaries

Information of residential completions in the City of Edinburgh Local Authority is published for all tenures by the Scottish Government as part of "Housing Statistics for Scotland Quarterly Update**":**
Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot

2. For completed developments, breakdown by:

• Year of completion
Information on the number of completed properties by Local Authority and Tenure, is published by the Scottish Government as part of "Housing Statistics for Scotland Quarterly Update**".** These statistics show completions by quarter, calendar year and financial year.
Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot
As stated under the response to question 1, this data is collected for each individual site, but additional manual work would be required to aggregate this data into specific developments such as Winchburgh.

• Price brackets at time of sale (affordable housing vs market rate)
This data is not held by the Scottish Government.

• Property types (flats, houses, social housing)
Information of Social residential completions is published by the Scottish Government as part of "Housing Statistics for Scotland Quarterly Update":
Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot
https://www.gov.scot/publications/housing-statistics-for-scotland-new-house-building/

Data on **property types (flats, houses, etc.)** is published by **Registers of Scotland (RoS)** in their quarterly reports:
https://www.ros.gov.uk/data-and-statistics

Information of Type of completed property e.g. Flat/House, is not collected centrally by the Scottish Government.

• Developer names and project names
This information is not collected centrally by the Scottish Government.
• Original planning application dates vs completion dates
This information is not collected centrally by the Scottish Government.

3. Sales and occupancy data for completed developments:
For all of the following:
• Average sale prices by development and year
• Time to sell/occupancy rates
• Percentage sold to local residents vs external buyers
• Percentage of investment purchases vs owner-occupiers
This information is not held by the Scottish Government.
You may wish to contact Registers of Scotland (RoS) to see if they hold and are able to provide this information: https://www.ros.gov.uk/

CURRENT AND FUTURE HOUSING DEVELOPMENT DATA (2020-2030):

4. Total number of new residential units planned, approved, under construction, and projected for completion in:
- Winchburgh development (remaining phases)
- East Lothian council area
- Midlothian council area
- Edinburgh city boundaries

The Scottish Government does hold not information on the total number of new residential units planned, approved, under construction, and projected for completion.

Planning authorities collect some of this information in their Housing Land Audits (HLAs) and relevant information is included below:

• Winchburgh development (remaining phases)
An excel version of West Lothian Council's 2024 Housing Land Audit (HLA) can be downloaded from this page (Housing Land Audit (HLA) - West Lothian Council), and the sites that make up Winchburgh Housing Market Area are all listed in full detail on the second page ("2- Effective Supply").

• East Lothian council area

From page 1 of East Lothian Council's 2023 HLA:
https://www.eastlothian.gov.uk/downloads/file/34172/east_lothian_housing_land_audit_2023

East Lothian Housing Land Audit 2023
East Lothian Summary

All Tenures

Status	Total site capacity	Total affordable units	All completions by 31/3/23	Total dwellings remaining	Programmed Completions								
					23/24	24/25	25/26	26/27	27/28	23-28	28/29	29/30	Post 2030
Under Construction	4,352	800	1,504	2,848	978	729	465	320	174	2,666	169	7	6
Consent	4,203	1,051	32	4,171	141	381	488	533	524	2,067	431	438	1,235
No Consent	708	0	0	708	0	0	0	0	44	44	151	187	326
Small Sites	704	0	280	212	21	21	21	21	21	105	21	21	65
Total Effective Supply	**9,967**	**1,851**	**1,816**	**7,939**	**1,140**	**1,131**	**974**	**874**	**763**	**4,882**	**772**	**653**	**1,632**
Constrained	432	121	15	417	0	0	0	0	0	0	293	119	5
Total Established Supply in East Lothian	**10,399**	**1,972**	**1,831**	**8,356**	**1,140**	**1,131**	**974**	**874**	**763**	**4,882**	**1,065**	**772**	**1,637**

• Midlothian council area

From page 21 of Midlothian's HLA (Housing Land Audit | Midlothian Council):

SUMMARY

Status	Total Site Capacity	Total Affordable Units	All Completions by 31/03/24	Total Dwellings Remaining	Units Completed in 2023/24	Programmed Completions										
						Short Term			Medium Term			Long Term				Post 2034
						24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	
Under Construction	4,212	977	1,160	3,052	821	710	789	377	306	224	194	178	104	60	60	50
Consented or Minded to Consent	6,606	1,610		6,606		30	216	345	420	475	530	493	437	395	400	2,865
No Consent	0	0		0		0	0	0	0	0	0	0	0	0	0	0
Small Sites	125			125		15	15	15	15	14	15	15	7	7	7	0
Total Effective Supply	10,943	2,587	1,160	9,783		755	1,020	737	741	713	739	686	548	462	467	2,915
Constrained Sites	1,080			1,080												
Total Established Supply	12,023			10,863												
Safeguarded Sites	600	150		600												

• Edinburgh city boundaries

From page 17 of Edinburgh's 2022 (their most recent) Audit (Housing Land Audit and Completions Programme 2022):

Housing Land Audit and Completions Programme 2022

Schedule 1. Land supply and delivery summary

	Housing Land Supply				Completions Programme								
Status	**Total site capacity**	**Total affordable units**	**All completions by 31/3/22**	**Total dwellings remaining**	**Programmed Completions** 22/23	23/24	24/25	25/26	26/27	*Total 22/27*	27/28	28/29	Post 2029
Under Construction	10,444	3,260	3,393	7,051	2,467	2,155	1,172	715	362	6,821	230	0	0
Consent	12,154	2,815	0	12,154	58	571	1,967	2,243	1,871	6,710	1,179	1,146	3,119
No Consent	3,181	757	0	3,181	0	0	0	100	278	378	404	550	1,849
Small Sites	297	0	4	293	58	59	59	59	58	293	0	0	0
Total Effective Supply	**26,076**	**6,832**	**3,397**	**22,679**	**2,583**	**2,785**	**3,198**	**3,117**	**2,569**	**14,202**	**1,813**	**1,696**	**4,968**
Market	*19,244*	*0*	*2,348*	*16,896*	*2,041*	*1,937*	*2,421*	*2,210*	*1,835*	*10,394*	*1,337*	*1,414*	*3,751*
Affordable	*6,832*	*6,832*	*1,049*	*5,783*	*542*	*848*	*777*	*907*	*734*	*3,808*	*476*	*282*	*1,217*
Constrained	7,717	2,170	359	7,358									
Total Established Supply in City of Edinburgh	***33,793***	***9,002***	***3,756***	***30,037***									

5. Breakdown of planned housing by:
For all of the following:
• Price brackets (affordable housing vs market rate)
• Property types (flats, houses, social housing)
• Developer names and project names
This information is not held by the Scottish Government.
In each case you may wish to contact the relevant Local Authority to see if they hold and are able to provide this information.

6. Planning applications data showing:
• Timeline of major developments approved
Information available on the Scottish Government website – Publications section:
Supporting documents - Planning Application Statistics 2024/25 (April 2024 to September 2024) - gov.scot (page 5)

For each of the following:
• Number of units in each development
• Projected completion dates
This information is not collected centrally by the Scottish Government.

DEMOGRAPHIC AND OCCUPANCY DATA:

7. Available data on who has purchased/occupied completed developments and who is purchasing current developments:
For all of the following:
• First-time buyers vs existing homeowners
• Local residents vs in-migration patterns
• Investment purchases vs owner-occupiers
• Age demographics where available
This information is not held by the Scottish Government.

8. Council housing waiting list data for Edinburgh, East Lothian, and Midlothian:

• Current waiting list numbers

Information on Adults on housing lists is published by the Scottish Government as part of the "Scottish Household Survey (SHS) Housing data tables". The most recent published data can be found here in table 1_49:
Supporting documents - Households in Scotland by housing tenure: Scottish Household Survey, 2023 - gov.scot

Information on housing lists is published by the Scottish Government as part of the annual housing statistics publication. The most recent published data can be found here:
Housing statistics: Management of local authority housing - gov.scot

• Average waiting times

Information on the length of time adults wait on housing lists is published by the Scottish Government as part of the "Scottish Household Survey (SHS) Housing data tables". The most recent published data can be found here in table 1_57:
Supporting documents - Households in Scotland by housing tenure: Scottish Household Survey, 2023 - gov.scot

• Changes in demand over past 5 years

Information on trends for Adults on housing lists is published by the Scottish Government as part of the "Scottish Household Survey (SHS) Housing data tables". The most recent publish data can be found here:
Supporting documents - Households in Scotland by housing tenure: Scottish Household Survey, 2023 - gov.scot

Information on housing lists is published by the Scottish Government as part of the annual housing statistics publication. The most recent published data can be found here:
Housing statistics: Management of local authority housing - gov.scot

• Impact of new developments on waiting list numbers

This information is not collected centrally by the Scottish Government.

AFFORDABILITY AND HOUSING CRISIS ANALYSIS:

9. Housing affordability assessments including: For all of the following: • Average house prices in completed developments vs local median income at time of sale • Current average house prices in new developments vs local median income • Percentage of completed and planned developments meeting affordable housing requirements This information is not held by the Scottish Government. You may wish to contact the relevant Local Authority to see if they hold and are able to provide this information. • Social housing provision in completed and planned developments Information on affordable / social housing is published by the Scottish Government as part of "Housing Statistics for Scotland Quarterly Update" and is broken down by Local Authority area: Housing Statistics for Scotland Quarterly Update: New Housebuilding and Affordable Housing Supply to end March 2025 - gov.scot
10. Housing needs assessments and strategic planning documents that analyse: • Whether completed developments met identified housing need This information is not collected centrally by the Scottish Government. • Whether current development plans meet identified housing need National Planning Framework 4, which together with the relevant local development plan forms part of the statutory development plan for Scotland, sets out a Minimum All-Tenure Housing Land Requirement (MATHLR) for each planning authority in Scotland. The MATHLR is the minimum amount of land, by reference to the number of housing units, that is to be provided by each planning authority in Scotland for a 10 year period. Information in relation to how the MATHLR as included in NPF4 for each planning authority was calculated is enclosed. **Attachment 2** – City of Edinburgh NPF4 Housing Land Response Template **Attachment 3** – City of Edinburgh Council NPF4 Housing Land Email with Further Correspondence from Council **Attachment 4** – City of Edinburgh Council NPF4 Housing Land SG Assessment Report **Attachment 5** – City of Edinburgh Council Initial Default Minimum All Tenure Housing Land Requirement Excel Calculator 25AH

Attachment 6 - City of Edinburgh Council Initial Default Minimum All Tenure Housing Land Requirement Excel Calculator 35%AH
Attachment 7 – East Lothian Council NPF4 Housing Land Response Template
Attachment 8 – East Lothian Council NPF4 Housing Land SG Assessment Report
Attachment 9 – East Lothian Council Excel Calculator
Attachment 10 - West Lothian Council NPF4 Housing Land Response Template
Attachment 11 – West Lothian Council NPF4 Housing Land SG Assessment Report
Attachment 12 – West Lothian Council NPF4 Housing Land Excel Calculator
Attachment 13 – Midlothian Council NPF4 Housing Land Response Template
Attachment 14 – Midlothian Council NPF4 Housing Land SG Assessment Report
(Note: Midlothian Council did not provide a Housing Land Excel Calculator to the Scottish Government)

For all of the following:
• Gap analysis between housing demand and supply by price bracket
• Impact assessments of large developments on local housing markets
• Analysis of why housing crisis persists despite large-scale development
This information is not collected centrally by the Scottish Government.

POLICY AND STRATEGIC DOCUMENTS:

11. Strategic housing investment plans

City of Edinburgh Council - Housing, Homelessness & Fair Work Committee – Strategic Housing Investment Plan (SHIP) 2025-30:
https://democracy.edinburgh.gov.uk/documents/s77562/Item%207.5%20-%20Strategic%20Housing%20Investment%20Plan%20SHIP%202025-30.pdf

East Lothian Council - Strategic Housing Investment Plan 2025/26–2029/30:
Strategic Housing Investment Plan Context Statement | East Lothian Council

Midlothian Council Strategic Housing Investment Plan 2025/26 – 2029/30:

Strategic Housing Investment Plans (SHIP) | Strategic Housing Investment Plan 2025/26 to 2029/30

West Lothian Council Strategic Housing Investment Plan 2025-30:
SHIP_2025-2030.pdf

12. Local development plan documents addressing housing targets and delivery

(1) Local Development Planning guidance (May 2023):
Supporting documents - Local development planning guidance - gov.scot
Pages 61-66 & 127–130 for information regarding housing land requirements and targets.

(2) **Attachment 15** - Minimum All-Tenure Housing Land Requirement (MATHLR) table. This shows the MATHLR figure for each planning authority, and the indicative local housing land requirement as included in any local development plan evidence reports submitted for assessment by the Planning and Environmental Appeals Division to date. Please note that if a planning authority is not included in this list, it is because their local development plan evidence report has not yet been submitted to the Planning and Environmental Appeals Division. The Scottish Government does not hold indicative local housing land requirements for local development plan evidence reports not yet submitted to the Planning and Environmental Appeals Division.

(3) List of current and completed local development plan examinations – link to the Planning and Environmental Appeals Division (DPEA) website:
Development plan examinations: list - gov.scot

(4) Links to local development plan delivery programmes are available on the specified Councils' websites:

City of Edinburgh Council:
City Plan 2030 Delivery Programme January 2025

East Lothian Council:
Delivery Programme (Action Programme Update) - LDP 2018 | East Lothian Council

Midlothian Council:
Delivery Programme 2025-2027 | Delivery Programme 2025-2027

West Lothian Council:
Local Development Plan (LDP 1) Delivery Programme - West Lothian Council

13. Any studies or reports analysing the effectiveness of current housing policy in addressing the housing crisis

(1) Affordable Housing Supply Programme (AHSP) - Deliverability Review (May 2025):
Affordable Housing Supply Programme (AHSP) - Deliverability Review - gov.scot

(2) SOLACE Report - Housing in Scotland: Current Context and Preparing for the Future (July 2023):
https://solace.org.uk/housing-in-scotland/

(3) Existing Housing Need in Scotland – A survey Commissioned by Homes for Scotland – Report by The Diffley Partnership and Rettie & Co (Jan 2024):
Existing Housing Need in Scotland - Homes for Scotland

(4) Scottish Land Commission Report - Land Supply for Housing in Rural Scotland (February 2025):
Land supply for housing in rural Scotland

(5) **Attachment 16** - Planning and Housing Data Review August 2024

(6) Competition and Markets Authority Housebuilding Market Study – Final Report 26 Feb 2024:
Housebuilding market study - GOV.UK

14. Post-completion reviews or assessments of major housing developments
This information is not held centrally by the Scottish Government.

National Planning Framework 4

Minimum All-Tenure Housing Land Requirement

City of Edinburgh Council Response May 2021

From the report and annexe approved by Planning Committee 19 May 2021

Lead Officer and contact:
[redacted]
Programme Director City Plan
[redacted]

PART 1 – Household Projections (Newly-Forming Households)

The **Household Projections** are derived from the 2018 National Records of Scotland work on future newly forming households. The Council agrees that this is the most up to date information available to the Scottish Government for this purpose, and that these show a reduced level of demand from the 2014 projections, which informed work on the Housing Need and Demand (HNDA) 2 process for the south east region. However, that is qualified by the following considerations.
It is noted that HNDA3 work can use the higher projection variant (higher migration) but the NPF4 calculator uses the principal variant as it is to calculate the minimum land requirement. Therefore, the outputs of HNDA3 might vary from those of the NPF4 methodology rather than reflect them. However, given that the variance between the principle variant and the higher is only 1% (and for the lower only -1%) then using the principle variant Is a reasonable approach towards a minimum default housing land supply.

Whilst this is an appropriate starting point, the Council considers that it does not properly reflect the circumstances of housing need and demand. These are projections based on the 2011 census and informed by trends in birth rates and in migration, both of which have fallen in recent years. Given the time elapsed since the census, the use of the projections as a starting point needs to be considered carefully alongside other evidence. Edinburgh remains a strong attractor to potential new households through its economic growth as well as having its own demographic changes and housing pressures with affordability being limited due to high prices. Continued economic success, particularly in the post Covid era requires a housing supply that can properly support the workforce in all sectors of the economy.

Housing Supply and Market Context

Edinburgh is a growing city and one of the most highly pressured housing markets in the country. The latest robust and credible Housing Need and Demand Assessment (HNDA2) states there is demand for between 38,000 and 46,000 new homes in Edinburgh over ten years; over 60% of these homes need to be affordable. The Council notes that this is based on the higher projections of the 2014 NRS figures and the HNDA calculated tenure split.

The Scottish Federation of Housing Associations, The Chartered Institute of Housing and Shelter Scotland recently commissioned research to look at Scotland's affordable housing need over the next five years[1]. The report highlights that building affordable housing should be a key part of Scotland's recovery out of the recession caused by the pandemic. The research also found that nearly 60% of the total annual affordable homes requirement for Scotland is needed in the Capital region (Edinburgh, Lothians, Fife and Borders), which is three times the need of the West Central area (Glasgow, Inverclyde, East Dunbartonshire, West Dunbartonshire, Renfrewshire, East Renfrewshire, North Ayrshire, and South Lanarkshire).

Edinburgh's population is projected to increase at a greater rate than the Scottish average, with the number of households projected to increase by 21% between 2018 and 2043, i.e. an additional 50,000 households in the city. Population and household growth are expected to place increased pressure on available housing. The Council notes that this figure relates to the 2018 NRS projections rather than the HNDA2 figures.

[1] Affordable Housing Need in Scotland Post-2021 (March 2020, revised May 2020) – SFHA, CIH Scotland, Shelter Scotland

Social rented homes account for only 14% of the housing stock in Edinburgh, compared to the Scottish average of 23%. The Council and Registered Social Landlords (RSLs) are experiencing high demand for social rent and mid rent homes. There are around 21,000 - 22,000 applicants registered on EdIndex (the Common Housing Register) at any one time. Overall available social rented homes for re-let are down by around 25% in 2020/21 as a result of Covid-19 pandemic, with an average of about 203 bids currently being received for available homes advertised through Choice.

Households registered on EdIndex can be awarded a Gold or Silver priority status based on their assessed housing need and there are currently around 5,700 applicants with a priority on their application, compared with an average of around 2,300 social rented homes becoming available each year.

Edinburgh lets more social homes than any other local authority to homeless households (72% of Council homes and 51% of RSL Partner homes). There are on average 3,130 additional households every year to whom the Council has a homelessness statutory duty to provide settled accommodation. Even with all the social lets made available to homeless applicants, there would still be a shortfall and there would be no available properties for other households with a priority need for housing. This demonstrates the need for a continued focus on both prevention and increasing access to settled accommodation in other tenures.

The average house price is around six times the average gross annual earnings in the city, making it the least affordable city in Scotland to buy a home. The lockdown restrictions effectively saw the sales market frozen over the usually active Spring market in 2020, but a sharp increase was observed as restrictions eased and number of sales in Edinburgh jumped to levels well above Summer 2019. Despite a second lockdown in Scotland, ESPC reported that, in the three months of December 2020 to February 2021, the average selling price for homes Edinburgh, the Lothians, Fife and the Borders had increased by 6.2% year-on-year to £265,446, while the volume of property sales in these areas was up 42.2% year-on-year over the same period.

The average advertised monthly private rent in Edinburgh in the last quarter of calendar year 2020 was £1,085, with the second highest rent recorded in Glasgow at £848 and a Scottish average at £826 (source: Citylets). Although this was the first year-on-year reduction in Edinburgh's average rent in a decade, it still represented a 41% increase from 10 years ago (2010 quarter 4) and was twice the rate of the 20% CPI inflation over the same period. One of the reasons for the year-on-year reduction was the increased number of properties available for rent, as landlords sought to secure rental income through residential lets whilst the holiday market had stalled under the Covid-19 pandemic.

It is estimated that there has been a loss of around 10% of Private Rented Sector homes to short term lets in recent years. The rapid growth in short term lets is creating further pressure on supply, rent levels and house prices in some areas. Although the Covid-19 pandemic has driven some of the short term lets back to the long term lets in the last year, the lasting impact is yet to be seen.

The tenure of mid-market rent is aimed at people who cannot afford home ownership but would not usually be eligible for social housing. The average mid-market rent (MMR) for a two-bedroom home in the city is around £630 a month; more than 40% cheaper than the average private rent.

The introduction of mid-market since 2010 has aided the Council in driving more value for every pound of Scottish Government grant provided. Homes receiving help from Scottish Government either through grant or rental guarantees have their rents restricted to the mid-point of market rent levels for the property sizes in the relevant Broad Rental Market Area. This guarantees the long-term affordability for tenants.

The Council is working with RSL partners to make mid-market rent more accessible for people in work, presenting as homeless. These measures include tailored housing option advice and improved information around the availability of mid rent homes, including homes in development.

Mid-market rent as a tenure continues to be a much-needed tenure for people on low to moderate incomes. The most recent NHT development at Western Harbour attracted around 42 applications per homes when it was released in 2018. Similarly, Edinburgh Living's own development of 22 homes at Clermiston attracted a large number of enquiries, with 80 notes of interest in the first three days of marketing and over 40 applicants attending an open viewing within the first week. No further advertising was required. Subsequent developments have continued to let well, with average time to let sitting under 30 days in the first six months of operation. However, cognisance needs to be taken of the competitive nature of mid-market rent in some locations within the city.

The City Region Deal, its emerging Regional Growth Framework and the incorporation of this in interim Regional Spatial Strategy feeding in to the NPF4 process need to be considered also. The Council's submission to that part of the process referred back to the proposed housing land supply set out in Choices, the Main Issues Report for City Plan 2030 and whilst that LDP process needs to a cross -reference point from the information previously submitted, it is emerging work which needs to go through the process of Proposed Plan, representation and Examination. Without the clarity of an approved SDP2 due to its rejection by Scottish Ministers, this continues to be an uncertain process which this work may help to inform.

In addition to the above the Council notes that the most up to date information on tenure split is given by HNDA2, where more than 60% of need and demand is of an affordable tenure (including MMR etc). Applying that split to the 10-year minimum housing land supply calculated from the housing projections indicates that only some 9000 market homes would be needed in the area over that period, some 900 completions per year. Recent market completions have risen to some 2000 per year. In those circumstances the evidence strongly suggests that this is an underestimation of market demand as well as of affordable need. Work going forward will need to take into account the emerging evidence of HNDA3 in terms of growth and demand scenarios and tenure split.

From all of the above, the Council maintains its commitment made in 2017 to build at least 20,000 affordable homes by 2027, to ensure that the availability and affordability of homes continues to be addressed and that economic growth is not hampered by a high housing cost barrier. In respect of that commitment the Council has published its HRA Investment Strategy as part of the support of this initiative to increase the delivery of housing supply in the area. Part of the supply will continue to come from affordable homes delivered from market sites.

PART 2 – Existing Housing Need

In terms of the **Existing Housing Need**, the figure for homeless households in temporary accommodation and households both concealed and overcrowded is 2140. This figure should be updated as the Council updates its figures for the year end 2020/21. The Council's "Rapid Rehousing Transition Plan" (RRTP), approved at Housing, Homelessness and Fair Work Committee on 18 September 2020, set out that as of 31st March 2020 there were 4,135 homeless cases where the Council has a duty to provide settled housing. The Council will feedback the updated figure as soon as it can.

Also, there is concern that this figure is treated as a standing snapshot which is added as a one-time number to the cumulative ten-year household formations. As set out in the above report (p54), even assuming no increase in homelessness presentations each yea, there is a rolling increase from unresolved demand, with a figure of 3,453 in 2019/20 rising to 4,918 in 2026/27 before projected increased supply would bring this down. Other models of demand and supply are also shown, however, the critical factors are that this is significantly higher than shown in the proposed NPF figures and is a changing and not static figure.

Therefore, the calculator should be adjusted to reflect the available data, as set out at the end of this response.

Also, there is concern that the introduction of the "Homelessness etc (Scotland) Act 2003 (Commencement No.4) Order 2019" means a removal of Local Connection in homeless assessments. Households will no longer be required to evidence a local connection to be entitled to homeless assistance. The RRTP anticipates that this will lead to a rise in the number of homeless households presenting in Edinburgh given the potential for finding employment, but the extent to which this is the case has yet to quantified. This impact of the removal of local connection will be assessed on an ongoing basis by the Homelessness Service and there may be a need to submit further revised figures to the Scottish Government in respect of this part of the calculation. It should be noted that the provisions of legislation to deal with the Covid-19 pandemic have had a similar effect and the first indication of the extent of this will be reported in the update to the RRTP in the summer, though data may be available shortly.

Therefore, in respect of this part of the calculation the Council's response must be seen as an interim one.

More generally in respect of the **methodology**, it is considered that this needs careful reading as currently set out and these are noted below. However, the essential process is recognised as being:

- to get a 10-year figure for a plan you take the newly formed households over 15 years, annualise that and multiply by 10 to get 10 years of newly forming households;
- existing need is then added to get total need/demand.

The proposed 10-year land figure to provide for 22,044 homes (27,555 with 25% flexibility]) would require 2,204 (2,756) new homes completed per year on average. The average completion rate over the last years has been 2,015. However, this takes in a period of severely reduced development following the recession. Completions over the last five years averages 2,540 with the latest year being just under 3,000. Therefore, completion levels could match a higher land supply given favourable economic conditions. The Council's HRA investment programme for affordable housing, the preferred policy requirement of the Main Issues Report for 35% affordable housing on market sites, the Government's Housing for 2040 programme and significant BTR investment in the city are additional mechanisms to deliver homes quickly without mortgage constraints and enable higher rates of completions.

PART 3 – Flexibility Allowance

The justification for the proposed 25% for urban areas over the 10 – 20% range set out in Scottish Planning Policy is that this reflects the provisions of the Planning (Scotland) 2019 Act that Local Development Plans be over 10 years rather than be reviewed at least every five years. Without analysing the original evidence behind the SPP allowance, the Council considers that this has worked well in principle and is acknowledged as a useful mechanism to ensure there is adequate land to provide for need and demand, where some sites may fail due to ownership, infrastructure or economic reasons. The proposed 25% to be taken as a minimum for urban areas should prove appropriate and the Council does not see a need to increase this. Given the provision that the housing land supply figures of the NPF4 would be a minimum figure that would not preclude an LDP allocating a larger supply of land if there were material reasons to do so this is seen as appropriate, and the land supply provided by the approach to affordable housing delivery as set out elsewhere in this response would be able to provide a very flexible supply for both affordable and market housing.

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

Instructions

The Excel Calculator must be used to produce a locally adjusted estimate of the minimum all-tenure housing land requirement. The initial default and adjusted estimates must be provided below.

Initial Default Estimate = 27,555

Adjusted Estimate = 48,125 @ 25% affordable housing requirement
36,875 @ 35% affordable housing requirement

A copy of the adjusted Excel Calculator must be submitted with the response template.

Taking account of the above questions and the proposed NPF4 default minimum housing land supply with 25% flexibility being land to provide for 27,555 homes, the Council considers that this would not be adequate. A key issue here is that this is an all tenure assessment of the amount of land (including flexibility) that would likely be needed to deliver some 22,000 homes based on household projections and an assessment of housing need.

However, this fails to take account of how many affordable homes are needed and how they would be delivered. As affordable homes are only partly delivered by Council and RSLs on their own or acquired land as 100% of site tenure, and at a lower rate on market sites through affordable housing policy requirements. This is currently 25%, with a preferred approach in Choices for City Plan 2030 of 35%. It is essential in calculating a realistic land supply to take account of this as it means a higher level of land supply is required to deliver the affordable homes needed. Equally where sites owned by the Council or RSLs are larger it will be desirable to ensure mixed communities are created or maintained by seeking market delivery alongside the affordable element, with the same consideration.

The earlier cited evidence of HNDA2 and the over 60% split towards affordable tenures emphasis this point. The standard requirement for affordable housing from market sites is

25%. The Council is considering consultation feedback from Choices to a proposed policy requirement of 35%. If the 35% requirement were to be used to deliver the 20,000 affordable homes, this would require some 58,000 homes to achieve this.

However, the Council's Housing Revenue Account (HRA) investment programme in land and new build homes will provide for a significant proportion of the 20,000 affordable homes.

To provide for half of the 20,000 affordable homes commitment from market sites, there would need to be land for some 30,000 homes, plus at least land for another 10000 homes for the HRA investment strategy.

If the affordable housing requirement was to be 25% then there would need to be land for some 40,000 homes plus the 10000 affordable homes provided through the HRA investment strategy.

To date some 6,300 affordable homes have been granted permission in the Council area since 2017 and some 4,600 homes either completed or acquired for affordable tenure. The Council's Housing Revenue Account (HRA) investment programme in land and new build homes will provide for a significant proportion of the affordable homes commitment. To provide for half of the remaining affordable homes commitment from market sites, there would need to be land for some 22,000 homes, plus at least land for another 7,500 affordable homes to be provided through the Council's HRA investment strategy. If the affordable housing requirement was to be 25% then there would need to be land for some 31,000 homes plus the 7,500 affordable homes through the HRA investment strategy. Either of these approaches would allow for significantly greater market demand than the household projections entail, and therefore allow for further growth if market conditions support it.

A further consideration of that affordable split is that, as noted earlier in this response, if it is applied to the housing projections, housing need and flexibility calculations set out as a minimum requirement by the methodology used in this proposal for NPF4 (land for some 27,500 homes), that would mean fewer than 9,000 market homes are required in the 10 year calculation period. Using the methodology that would mean a land supply for some 11,250 homes would be adequate for this. Given that completions have averaged some 2,500 per year for the last 5 years, and given that of the near 3.000 completions last year nearly 2,000 of those were market homes, it is highly unlikely, unless the market changes to a very significant degree, that it will be the case that there will be only ab average of 900 market completions per year over the 10 year period.

From the approach set out in this response it would be reasonable to consider an all tenure land supply for 39,825 homes on the basis of a 35% affordable housing requirement or 48,125 homes on the basis of a 25% requirement, as the default minimum, as an interim figure, for NPF4. As the affordable housing requirement policy change remains to be considered through the representation and Examination process of City Plan 2030, and for the reasons summarised below, it would be prudent at this stage to advise of an interim figure of land supply to provide for 48,125 homes to deliver the affordable housing need identified in this report.

However, given that retaining the affordable housing requirement at 25% would allow for a significantly greater supply of housing land for the market than the housing projections indicate, and thereby take into account the potential for the market to outstrip the estimated demand from the all-tenure projections, this would be a very generous housing land supply. It is therefore the Council's recommended approach to increase the affordable housing policy requirement to 35% to reduce this significant oversupply of land. Whilst this is

departing somewhat from an all-tenure approach to the housing land supply, it is clear that a realistic supply must take account of the delivery of affordable housing as a factor affecting the amount of land needed.

- The assumptions around the principle variant for household growth projections are reasonable and accepted but local evidence on housing prices, availability and of affordable housing need demonstrate why the Council has committed to providing for 20,000 affordable homes and why a greater land supply than that proposed in the default minimum figures is required.
- The assumptions around housing need are out of date. The most recently available figure for homelessness of 4351 is used at the time of writing but will be updated through iterative discussions with the Scottish Government on this matter.
- The Council is concerned that the use of an all-tenure figure hides the clarity of concealed households and overcrowding and affordable housing need, and how this relates to delivery of affordable housing.
- The Council considers that its affordable housing commitment actively addresses need and demand for housing and future housing provision and that this needs to be a consideration for the default minimum housing land figures in NPF4 as an appropriate land supply for Edinburgh

Taking from the above as applied to the Scottish Government's Excel calculator, it is proposed that an appropriate minimum housing land supply figure for City of Edinburgh be as follows.

	SG		**CEC**	25% AH	35% AH
Input	Annual	Cumulative	Annual	Cumulative	Cumulative
Newly forming households	1,990	19,905	1,990	19,905	19,905
Existing Housing Need	2,140	2,140	4,135	4,135	4,135
Affordable requirement + additional market supply	-	-	-	14,460	5,460
Subtotal	-	22,045		38,500	29,500
Flexibility Allowance		25%		25%	25%*
Total		27,555		48,125	36,875*

*correction of error from committee report annexe which incorrectly used 35% in the flexibility line

Note on Methodology

- Annexes H and I are misleading as the only annualised figure is for newly forming households – the existing need figure is always static as it represents the number of households in need at the moment (overcrowding and concealed households).
- In Annex H, they calculate the newly forming households for 15 years and add the existing need and call it 15-year default figure but the 15 year default figure is not used for anything in later stages.

- In Annex I, they present the housing need figure and the annualised newly forming household figure, then for reasons not clear, add them together in the last column.
- In later steps, they correctly use the annualised newly forming households and add in the existing need.

PART 5 – Housing Market Partnership (HMP) and Stakeholder Involvement

List of HMP members

Fife Council
West Lothian Council
City of Edinburgh Council
East Lothian Council
Midlothian Council
Scottish Borders Council
Scottish Government
Health & Social Care
CHMA (Assurance)

Summary of HMP views

A general view of HMP members is a concern at under provision and that the SG figures are too low, however, no clear view has emerged from consultation with the HMP as time constraints meant there were very few responses. This is part of the iterative work referred to in the Planning Committee report and will be taken forward and further reported. The responses which were received could not form part of the report itself due to committee paper publication dates and a brief verbal summary was given in planning committee. Aside from discussions and a response from Homes for Scotland on behalf of their South East Scotland housebuilder/developer members, one response was received from a community group and one form an individual (see other stakeholders section).

Homes for Scotland will respond separately to the consultation in any case but in summary it sees a need for at least 25,000 new homes per year across Scotland and that this figure should be related proportionately to the 2019 level of completions (22,596 in their figures) in each Planning Authority area. It considers the SG figures very low in comparison with this. HfS considers that the housing need figure should reflect potential single households as the methodology hides these and is sceptical on the household formation projections. HfS suggests an Edinburgh minimum of 42651 to reflect 2019 completions.

With the approval of the committee report it is now possible to have more meaningful discussions with stakeholders.

HMP agreement
Has the HMP agreed your minimum housing land figure? *Please delete accordingly*

NO - Please see comment above

List of Additional Stakeholders

West End Community Council (Edinburgh)
West Pilton/West Granton Community Council (Edinburgh)
Portobello Community Council (Edinburgh)
Edinburgh Affordable Housing Partnership
Ore Valley Housing Association
Richard Street
NAS Tech Construction
Ladybank Homes Ltd
AJ Stephens
Muir Homes
Keepmoat Homes
Ogilvie Homes
The Newport Property Development Company
Allanwater Developments
Springfield Homes
Campion Homes
NHS Lothian

Summary of Stakeholders Views

The community organisation and individual responses were similar, focusing on the need to wait until inward migration stabilises post Brexit. They support a focus on brownfield rather than greenfield development and otherwise refer back to responses made to SESplan SDP2.

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.

Head of Housing

Full Name: [REDACTED]

Full Title: Housing Services Manager

Email: [REDACTED]

Date:24 May 2021

Signature: [REDACTED]

Head of Planning

Full Name: [REDACTED]

Full Title: Chief Planning Officer

Email: [REDACTED]

Date: 24 May 2021

Signature: [REDACTED]

From: [redacted]
To: [redacted]
Cc:
Subject: RE: Housing Land Requirement - Actions
Date: 07 September 2021 00:07:46

Hi [redacted]

Further to my earlier email please see comments below. If there are still some concerns then please let me know.

Completions:

[redacted] doesn't think there is much disparity between the two. Looking at individual years, there will always be differences as the SG series is based upon issuing of completions certificates and the HLA is based upon physical visits. Completion certificates and the processing of them on uniform can involve quite a lag causing completions that we count one year appearing on the next year for SG figures and vice versa. Also, its possible that SG have compared the new build completions series to the HLA which doesn't include conversions and subdivisions – we get a substantial number of those. If you look at the averages over the last years – the two series are pretty close – see table below.

	2014-15	**2015-16**	**2016-17**	**2017-18**	**2018-19**	**2019-20**	**Average 2014 - 2019**
Scottish Gov New build	*1523*	*1812*	*2229*	*1832*	*2813*	*3127*	
Scottish Gov Conversions	*35*	*23*	*234*	*290*	*238*		
SG - All Completions	**1558**	**1835**	**2463**	**2122**	**3051**		**2206**
HLA - all completions	**1525**	**2281**	**2391**	**2650**	**2399**	**2967**	**2249**

Existing Need:

The Council published its updated Rapid Rehousing Transition Plan recently. The figure for duty to provide settled housing in that is 4766, a 15% increase on the previous year. It should be noted that this despite quite significant reductions in the figures for domestic ejection, dispute and tenancy loss, particularly in PRS. Clearly a large proportion of those will have been affected by Covid reducing the options for people to move and Covid regulations reducing loss of tenancy e.g. PRS loss down from 638 in previous year to 219. Therefore it remains a conservative estimate feeding into the justification for the affordable housing commitment as commented on below.

Additional Households:

CHMA HNDA tool uses household projections under the assumption that past trends are a good proxy for demand. This assumption is only fair for a self-contained housing market area (Edinburgh isn't one) and for a housing market operating without constraints. Households working and probably wishing to live in Edinburgh are living in neighbouring council areas and commuting in. Previous SDP and structure plan spatial strategies were for significant amounts of CEC's demand for housing being met elsewhere in the 'functional housing market area'. Assuming these strategies were even partially successful, the result is that CEC hasn't grown as it might – the trends that the latest projections are based on have been affected by constraints imposed by regional policy – **they are not a perfect (acceptable?) proxy for demand –** If we make land available, Edinburgh will be allowed to grow faster than projections suggest.

In the discussion I noted that the submission had been approved by Planning Committee and that whilst there is scope for change in respect of the existing need figure for duty to provide housing as this was flagged up in the report, we're not in a position to amend household projections unless we were to take a further report back to committee. Your methodology set out potential options for considering how a different approach to household projections or how local policy initiatives might be some of the ways to amend the base figures. The spreadsheet calculator gave limited options for recording this and therefore it was entered as submitted.

The key aspect of this part of the conversation was whether the input of local policy initiative (20000 affordable homes commitment) narrated in the written return, including the justifications for it, can be amended instead to higher household projections given the increase was entered on that line In the spreadsheet (The submission explained the reasons for doing this, to avoid any corruption of the spreadsheet by adding additional lines. My view remains that officers cannot depart from the approved committee report which set this out as a means to meet the policy initiative, at least not without going back to committee to have such a change approved.

However, the evidence given in the written return can also be read as evidence of additional household formation that in turn justifies the local policy initiative. In a sense the evidence supports either approach. It may be that the Scottish Government takes a pragmatic view that this should be extracted from local policy initiatives and expressed as a different view of household projections. In the absence of an established methodology for the latter it has been expressed by the Council in terms of its policy initiatives. Ultimately this changes where the numbers slot in rather than the numbers themselves. Therefore I do not see an issue in the government translating the policy initiative into a change in the projections for methodological consistency if it sees that as an appropriate action.
Trust this explains each point but please let me know if further commentary is needed,
Regards
[redacted]

From: [redacted]
Sent: 01 September 2021 13:56
To: [redacted]
Cc: [redacted]
Subject: Housing Land Requirement - Actions

[redacted]

Just a friendly nudge to confirm that the actions from our 16 August meeting on Housing Land Requirements are in-hand. When do you think you'll be able to respond?
Actions were:
Action 1 – Council to provide a view on the possible reasons for the disparity between the Council HLA completions and Scottish Government completion figures.
Action 2 – Council to provide a view on whether they are content that the existing need figure in the response template which is approx. half of what was identified in previous HNDA.
Action 3 – Council to provide Scottish Government with additional information to inform the figure that will go into Draft NPF4 including an existing need figure based on the HNDA methodology, an adjusted household projection figure and the policy driver underpinning this including where the additional households are likely to come from.
Thanks,
[redacte
Thanks,
[redacted]

National Planning Framework 4

Edinburgh

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
City of Edinburgh	27,550	36,900* or 48,150**

*preferred scenario based on 35% affordable housing provision.
**alternative scenario based on 25% affordable housing provision.

The Council initially presented two locally adjusted estimates; the preferred scenario is 36,900 and the second scenario is 48,150. Whilst both include newly-forming households, existing need and a flexibility allowance they also include an additional step to the methodology. This is called the 'affordable requirement plus additional market supply'. For the preferred scenario this additional element equates to 5,460 whilst for the second scenario it is 14,460.

The Council take this additional step in order to factor in differences in tenure, split between affordable and market housing. They believe that the initial default estimate does not factor in the need for affordable housing as set out in Housing Need and Demand Assessment (HNDA) 2 and the commitment to affordable homes in the Council's Housing Revenue Account.

The range of figures is based on a land supply delivering either 25% affordable housing (the general contribution promoted in Scottish Planning Policy) or 35% affordable housing (the aspiration set out by the Council in its proposed City Plan 2030). The 25% scenario equates to the higher figure of 48,125, whilst the 35% scenario equates to the lower figure of 36,900.

The Council include a final breakdown of the initial default and locally adjusted estimates as set out in the extract below. The Excel Calculator has not been designed to accommodate this element and the Council have used Step 13 to make the figures 'fit' within it as follows: the existing housing need can be input as standard, then the newly-forming households and affordable and market requirement figures are added below and entered as newly-forming households. The calculator as submitted requires to be read in conjunction with the explanation to be transparent in this respect.

Extract from the Council's Response Template

	SG		**CEC**	25% AH	35% AH
Input	Annual	Cumulative	Annual	Cumulative	Cumulative
Newly forming households	1,990	19,905	1,990	19,905	19,905
Existing Housing Need	2,140	2,140	4,135	4,135	4,135
Affordable requirement + additional market supply	-	-	-	14,460	5,460
Subtotal	-	22,045		38,500	29,500
Flexibility Allowance		25%		25%	25%
Total		**27,555**		**48,125**	**36,875**

The Council indicate that Housing Land Audit (HLA) completions over the last five years (2015/16 to 2019/20), average 2,540 with the latest year being just under 3,000.

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 (19,905).

The Council indicate that work is on-going for the next HNDA (3) and that it can use the high migration household projection variant. They note that the NPF4 work uses the principal projection as it is to calculate a minimum land requirement and the variance between this and the higher variant is only 1%. They therefore consider it to be a reasonable approach.

As indicated in the section above, the authority initially proposed an additional step in arriving at the locally adjusted estimate. In a supplementary submission, the Council indicate that this can also be read as evidence of additional household formation. They note that this ultimately changes where the numbers slot in rather than the numbers themselves.

In the supplementary submission the Council also outline that through previous Strategic Development Plan and Structure Plan spatial strategies significant amounts of their demand for housing has been met elsewhere in the 'functional housing market area' (in neighbouring authorities) with the result that the Council area hasn't grown as it might. They therefore consider that the trends which the latest NRS projections are based on have been affected by past regional policy.

The Scottish Government agrees with the authority's view that the additional market supply to deliver affordable housing can be viewed as a different

	expression of potential household growth. In view of this and comments on the projection trends, the NRS 2018-based high migration variant is used, 24,090, to arrive at the MATHLR, which supports consistency with the Scottish Government methodology. **Household Projection: Default Compared to Adjusted Estimates** **Default** | **Adjusted** | **MATHLR** Edinburgh | 19,900 | 25,350/ 34,350 | 24,100
3	**Existing Housing Need** **Existing Housing Need: Default Compared to Adjusted Estimates** **Default** | **Adjusted** | **MATHLR** Edinburgh | 2,150 | 4,150 | 8,950 The Council propose an alternative existing housing need estimate using figures taken from the Rapid Rehousing Transition Plan for the period to 31 March 2020. The estimate equates to the number of homeless cases where the Council has a duty to provide settled housing. The Council indicate that they are assessing changes to homelessness legislation and the effect of the pandemic for consequences to existing housing need figures. In a supplementary submission it was advised that the Council had updated its Rapid Rehousing Transition Plan and the figure for duty to provide settled housing is 4,766. They indicate that they consider this to be a conservative estimate. The last HNDA(2), confirmed as robust and credible (2015), established in-house existing need at 8,942 units. The Scottish Government consider this to be a more appropriate estimate, given information in the authorities responses and acknowledging the next HNDA is progressing..
4	**Flexibility Allowance** City of Edinburgh use the default flexibility allowance of 25%.

CORE PROCESSES ASSESSMENT	
1	**Using the Response Template and Excel Calculator** The Response Template has been used to make the case for change, word limits are not exceeded substantially and its completion is correct. A copy of the Edinburgh council adjusted Excel Calculators have been provided.

2	**Housing Market Partnership (HMP) and Stakeholders Involvement** The HMP members comprise: Fife Council, West Lothian Council, City of Edinburgh Council, East Lothian Council, Midlothian Council, Scottish Borders Council, Scottish Government, Health and Social Care. A general view of HMP members is a concern at under provision and that the initial default estimate figures are too low. The authority indicate a response was also received from Homes for Scotland (HfS), a community group and an individual. HfS provide their view of the minimum figures required for Edinburgh, and the community group and individual support a focus on brownfield rather than greenfield.
3	**Joint Housing and Planning Senior Official Sign-Off** Senior planning and housing officers have signed-off the submission.
4	**Statistical Evidence** The Council has used some robust sources of statistical evidence to support their case including: • NRS 2018-based household projection (principal) • SG default estimate of existing housing need They have also used some in-house administrative sources of data and care has been taken to avoid double counting and over-estimation. These include: • an alternative existing housing need estimate using figures taken from the Rapid Rehousing Transition Plan
5	**Policy Evidence** The authority note that Edinburgh remains a strong attractor to potential new households through its economic growth as well as having its own demographic changes and housing pressures with affordability being limited due to high prices. They continue that economic success, particularly in the post Covid era requires a housing supply that can properly support the workforce in all sectors of the economy. Reference is made to recent research on affordable housing need and demand for social rent and mid rent homes. The strength of the market sector is also highlighted. The authority refer to the City Region Deal and the current preparation of the next Local Development Plan. They also highlight that the Council maintains its commitment made in 2017 to build at least 20,000 affordable homes by 2027. Reference is made to the preferred policy option of the Main Issues

	Report for 35% affordable housing on market sites, Housing to 2040 and significant Built to Rent investment in the city as mechanisms to deliver homes quickly without mortgage constraints and enable higher rates of completions than has been to date. Proposed City Plan 2030 and the associated Housing Technical Note sets out that its proposed housing land requirement under current SPP is 44,293 and that there is a total land supply of 57,428. This would be sufficient to meet the proposed HLR of 44,293 and proposed MATHLR of 41,300. It should be noted that the plan is still subject to consultation and examination under current policy requirements. The approach taken to establishing the MATHLR does not prejudge any changes to national policy prior to NPF being finalised.

MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)

For the reasons specified above the proposed MATHLR is:

	MATHLR
Edinburgh	41,300

Appendix A – Response to Scottish Government Consultation on Minimum All Tenure Housing Land Requirements

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.

East Lothian Comments

East Lothian Council agrees with the use of the NRS 2018-based principal household projections as a method to provide a consistent base across the country. This consistency will be vital for the Scottish Government in addressing its spatial growth priorities such as regeneration and repopulation.

The Council also supports the use of the mid-range migration variant. Given the 10 year timeframe for LDPs it would seem prudent to continue to use the mid-migration variant as over such a long period. There is no information that would point to a consistent trend that requires the use of the low or high variants. The probability is that over this period, migration will rise and fall and the use of a mid-range will reflect this, in a similar manner to the use of annual averages for housing land requirements.

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.

East Lothian Comments

The default set out in the consultation documents only takes into account households in temporary accommodation on 31st March 2020. This does not include households who are recorded via HL1 as homeless but chose not go into temporary accommodation. It also does not include the current existing need of households who are not captured via the homelessness system. Examples of these households include those who are living in housing that does not meet their current needs, or who are living in institutional settings due to appropriate housing provision either not existing or not existing in sufficient supply. As a result of these gaps, the following methodology is recommended.

Homeless

At 31st March 2021, 667 individuals had live homeless applications, this includes those in temporary accommodation and those who are otherwise homeless. Between 2015/16 and 2018/19 an average of around 5% of households whose cases were closed, were discharged to the private rented sector. This allows an assumed adjustment of a 5% reduction in numbers, as 5% of the need can be met within the existing housing stock. This takes the existing need for homeless households to 634 at 31st March 2021.

Overcrowded and Concealed

The Council agrees to use the Scottish Government default for Overcrowded and Concealed.

Support Needs / Special Forms of Housing

The Council recommends that the following household types are be counted, unless by moving they free up social rented provision (either Council or Housing Association;

1. Households whose housing needs cannot currently be met within existing provision i.e. where the housing type required does not exist in the local area, such as 'core and cluster'.

2. Households that require adaptations which cannot be met within their current housing and need to be moved.

Using the above criteria, the total for East Lothian is 74 households. These are from;

1. Housing Episode Forms – H&SCP complete where housing does not exist and the individual has complex needs i.e. learning disability, mental health, and physical disability. Within these, households who currently live in a Council tenancy where the entire household would be moving to a new Council tenancy have been discounted. These figures have been cross-referenced with the re-housing panel list to ensure that there is no double counting. The total number is 63.

2. Re-housing panel points – Households have been discounted who have an application that is; deferred, an offer is pending or recently been accepted, as well as all those who are transfer tenants (as they will be freeing an affordable home by moving), and all those who are also currently homeless (these will be captured in the Homeless figure). The total number is 11.

East Lothian Summary
Homeless Live Cases, with a reduction of 5% – 634
Overcrowded and concealed – 57
Support Needs / Special Forms of Housing – 74
Total = 765 (The default tool in the Scottish Government figure suggests 478).

East Lothian Council recommends that the levels of existing need in the Housing Land Requirement calculation be amended to reflect the 765 households identified in the above calculation, as this more accurately reflects the need in East Lothian. This figure has been fed into the attached Excel calculator.

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.

East Lothian Council Response

The Council agrees with the categorisation of East Lothian as urban and to the subsequent use of a 25% flexibility allowance in the calculation of the Council's Minimum Housing Land Requirement.

Although higher than the 10 – 20% figure set out in the current Scottish Planning Policy, the increase to 25% seems appropriate given the longer timeframe of LDPs.

The Council sees a risk of double counting of the flexibility allowance and requests that the development plan regulations acknowledge this risk and thus do not require that additional flexibility be added at the LDP stage. This would result in an unnecessarily large degree of flexibility and make the implementation of an infrastructure-led approach significantly harder.

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

Instructions

The Excel Calculator must be used to produce a locally adjusted estimate of the minimum all-tenure housing land requirement. The initial default and adjusted estimates must be provided below.

East Lothian Council Response

Initial Default Estimate = 6,050

Adjusted Estimate = 6,400

The Council substantially agrees with the methodology and subsequent outputs of the Minimum Housing Land Requirement calculation. The exception are the revisions to the existing need figures set out under question 2. When these revised figures are put in the Excel Calculator, this results in an increase in the Minimum Housing Land Requirement by 350 to 6,400.

This revised figure is higher than the annual average number of homes completed within East Lothian over the last 10 years. Thus the proposed minimum number will result in housing growth across East Lothian. The delivery of the proposed level of growth will put pressure on the infrastructure and environmental capacity of the area and it is essential that NPF4 puts policy in place that ensures this development will progress in a sustainable manner.

It is vital that any housing land requirement figures are accompanied with a strong 'infrastructure first' policy which is backed up through a wider consideration of how infrastructure is funded, so that the infrastructure needs of new communities are addressed before housing development is implemented. This is one of the key methods through which the place making agenda, which will feature so prominently in NPF4, can be delivered.

A copy of the adjusted Excel Calculator showing the revised figures is attached.

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.

East Lothian Response

The Council undertook a short consultation through the Housing Market Partnership (HMP). This was undertaken through the context of SESplan and related to all the South East Scotland local authorities.

There were a limited number of responses to the consultation but one of the responses, from Homes for Scotland (HfS), covered a multitude of interested parties. This also reflected that the HNDA is currently being progressed and consulted on across South East Scotland and many of the affordable housing providers and those involved in the social housing sector are engaging through that process.

List of HMP members

The consultation was sent out to over 50 organisations including Homes for Scotland, housebuilders, planning consultants, community groups and local authority representatives.

Summary of HMP views

The Community groups responded making no specific comment on the methodology or the outputs but highlighting the large amount of recent and planned levels of house building across the region. They highlighted the strain that these levels of growth were putting on the infrastructure of the region and the need to address fully these, often-longstanding, issues when developing future planning policy.

Campion Homes responded stating that the minimum housing land requirements were too low, did not represent the needs of the area, were unambitious and needed to be altered to a higher figure. HfS did not agree with the methodology or the outputs in the Scottish Government consultation. HfS recommends an alternative approach which is not based on the household projections but which extrapolates the 2019 completion figures across the following ten years to give an alternative housing land requirement. This alternative requirement also uses an aspirational national housebuilding figure of 25,000 houses per year derived by HfS.

East Lothian Council does not agree with this alternative approach, as it is concerned about the basis of the numbers and the methodology. There is no justification for choosing one particular year as the base year for the delivery of

housing for the next decade, beyond choosing the year that offers the highest post-recession completion figures.

HfS use the proportions of the overall national housing delivery completed in each local authority area in 2019 to determine the levels going into the future. This means that the authorities that have experienced high levels of housing development in 2019 will continue to do so for the next 10 years. This approach does not allow for the development of a wider national planning strategy as it serves to reinforce existing patterns of development, encourages future growth in the areas that for example are either the most marketable, or where there has been a high level of housing growth following the adoption of a new plan.

As the figure is not linked to any household projections or any other indications of future housing related trends, there is no relationship between these figures and a demonstrated need for housing. HfS highlights shortcomings in using household projections as predictors of what is likely to (or desired to) happen in practice. ELC's view is that the alternative approach suggested does not properly address the issues they highlight.

In the case of East Lothian, the figures represent a doubling of average housing completions over the last 10 years and could not be accommodated within the environmental or infrastructure capacity of the Council area. It is also doubtful that the development industry could practically deliver this level of housing either within the Council area or across Scotland.

As a minimum or even a maximum figure the 12,000 houses presented by HfS for East Lothian is undeliverable and both these outputs and their methodology should be dismissed.

The Council does agree with HfS that more local assessment of existing housing need should be undertaken to feed into the methodology and this exercise has been reflected in the calculations above and through the ongoing work of the HNDA.

The Council does concur with the responses from the community groups which highlight the need for any housing growth over the next ten years to be accompanied by an 'infrastructure first' approach to ensure that high quality environments can be delivered that encompass the objectives of the place making and climate change agendas.

HMP agreement

Has the HMP agreed your minimum housing land figure? *Please delete accordingly*

N/A

Due to the timescales involved we consulted the HMP on the basis of the Scottish Government's draft minimum figures. The revised existing needs figures have subsequently been arrived at through the continued development of the HNDA process. Local groups are fully engaged in the HNDA process.

List of Additional Stakeholders

N/A

Summary of Stakeholders Views

N/A

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*)

Head of Housing

Full Name:

Full Title:

Email:

Date:

Signature:

Head of Planning

Full Name:

Full Title:

Email:

Date:

Signature:

National Planning Framework 4

East 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

	Initial Default Estimate	Locally Adjusted Estimate
East Lothian	**6,050**	**6,400**

The locally adjusted estimate is primarily driven by the projections for newly forming households. The Council agrees with the methodology and subsequent outputs of the initial default estimate with the exception to the existing housing need figures. This results in an adjusted MATHLR of 6,400; an increase of 350. This locally adjusted estimate is higher than the annual average number of homes completed within East Lothian over the last 10 years (Scottish Government completions data 5,124).

2 Household Projections (Newly-Forming Households)

The National Register of Scotland (NRS) 2018-based principal migration variation has been used by the Council. The single year data is generated correctly within the Excel calculator.

The authority consider that given the 10 year timeframe for Local Development Plans it is prudent to use the principle migration variant. They note there is no information that would point to a consistent trend that requires the use of low or high variants. They consider that the probability is that over this period, migration will rise and fall and the use of the principle will reflect this.

Household projection is 4,350.

Household Projection: Default Compared to Adjusted Estimates

	Default	Adjusted
East Lothian	4,350.	4,350

3 Existing Housing Need

Existing Housing Need: Default Compared to Adjusted Estimates

	Default	Adjusted
East Lothian	500	750

The Council propose an alternative existing housing need figure comprising:

- Homeless household in temporary accommodation and live homeless applications

	• Overcrowded *and* concealed household using the Scottish Government default • Support needs which cannot be met with the existing housing stock profile or by an adaptation to existing stock The Council explains that these forms of existing housing need cannot be met in-situ. They have taken care to net off any in-situ solutions to arrive at an estimate of existing housing need that can must be delivered by a new unit of housing.
4	**Flexibility Allowance** East Lothian use the default flexibility allowance of 25%.

CORE PROCESSES ASSESSMENT	
1	**Using the Response Template and Excel Calculator** 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.
2	**Housing Market Partnership and Stakeholders Involvement** A consultation was sent out to over 50 organisations including Homes for Scotland, house builders, planning consultants, community groups and local authority representatives. This focused on the initial default estimate. The locally adjusted estimate was not discussed and was not agreed. The revised existing housing need figure has subsequently been arrived at through the continued development of the HNDA process. A planned approach was supported by community groups to fully address impacts on infrastructure. The authority provided an overview of the position of Homes for Scotland, in that they propose a higher MATHLR, and respond with their views on this.
3	**Joint Housing and Planning Senior Official Sign-Off** Senior planning and housing officers have not signed the template however their agreement was noted in the covering email.

4	**Statistical Evidence** The Council has used some well recognised sources of statistical evidence to support their case including: • NRS 2018-based household projection (principal) • Scottish Government estimate of concealed *and* overcrowded households They have also used some in-house administrative sources of data and care has been taken to avoid double counting and over-estimation. These include: • Housing Episode Forms • Re-housing Panel Points
5	**Policy Evidence** As East Lothian generally supports the approach for calculating the housing land requirement, there is no discussion on policy drivers that may impact on considerations.

MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)

For the reasons specified above the MATHLR is:

	MATHLR
East Lothian	6,400

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:

Newly-forming households	+	Existing housing need	+	Flexibility allowance (%)	=	**Minimum all-tenure housing land requirement**

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) 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).

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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)

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	**1,080**
Concealed and Overcrowded households from the Census (2011) Uprated to the (SHS 2017-2019) estimates	**1,39**
TOTAL	**1,219**
Rounded to the nearest 50	**1,200**

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 suggest 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 4th 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 10th 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

Full Name: [redacted]

Full Title: Head of Housing, Customer and Building services

Email: [redacted]

Date: 3 June 2021

Signature: [redacted]

Head of Planning

Full Name: [redacted]

Full Title: Head of Planning, Economic Development and Regeneration

Email: [redacted]
Date: 19 May 2021

Signature: [redacted]

List of Housing Market Partnership that have been consulted.

Name	Organisation	Email address
[redacted]	Homes for Scotland	[redacted]
[redacted]	Stewart Milne Homes	[redacted]
[redacted]	Wallace Land Investments	[redacted]
[redacted]	Allanwater Developments Ltd	[redacted]
[redacted]	West Lothian Council	[redacted]
[redacted]	Midlothian Council	[redacted]
[redacted]	Barton Willmore	[redacted]
[redacted]	Ryden LLP	[redacted]
[redacted]	Berwickshire Housing Association (RSL)	[redacted]
[redacted]	Eildon Housing Association (RSL)	[redacted]
[redacted]	Scottish Borders Housing Association (SBHA) (RSL)	[redacted]
[redacted]	Waverley Housing (RSL)	[redacted]
[redacted]	Corporate Policy (SBC)	[redacted]
[redacted]	Economic Development (SBC)	[redacted]
[redacted]	Borders Third Sector Partnership	[redacted]
[redacted]	Health & Social Care Partnership	[redacted]
[redacted]	Health & Social Care Partnership / Physical Disability Reference Group	[redacted]
[redacted]	Health & Social Care Partnership / Physical Disability Reference Group	[redacted]
[redacted]	SBC Homelessness & Gypsy Traveller working group	[redacted]
[redacted]	SBC Homelessness	[redacted]
[redacted]	SBC Gypsy Traveller Policy working group	[redacted]
[redacted]	Cairn HA	[redacted]
[redacted]	SFHA	[redacted]

[redacted]	Homes for Scotland	[redacted]
[redacted]	CALA Homes (East) Ltd	[redacted]
[redacted]		[redacted]
[redacted]	MacTaggart & Mickel	[redacted]
[redacted]		[redacted]
[redacted]	Walker Group (Scotland) Ltd	[redacted]
[redacted]	Persimmon Homes East Scotland	[redacted]
[redacted]		[redacted]
[redacted]		[redacted]
[redacted]	Robertson Homes	[redacted]
[redacted]		[redacted]
[redacted]	Avant Homes	[redacted]
[redacted]		[redacted]
[redacted]	Stewart Milne Homes	[redacted]
[redacted]		[redacted]
[redacted]	Barratt Homes & David Wilson Homes	[redacted]
[redacted]		[redacted]
[redacted]	Dandara	[redacted]
[redacted]	Miller Homes Ltd	[redacted]
[redacted]		[redacted]
[redacted]	Cruden	[redacted]
[redacted]	Taylor Wimpey East Scotland	[redacted]
[redacted]		[redacted]
[redacted]	Bellway	[redacted]
[redacted]		[redacted]
[redacted]	East Lothian Housing Association	[redacted]
[redacted]	Dunedin Canmore	[redacted]
[redacted]	Homes for Life	[redacted]

[redacted]	Places for People	[redacted]
[redacted]	LAR	[redacted]
	Hillcrest	
	Margaret Blackwood	[redacted]
[redacted]	Ark HA	[redacted]
	Viewpoint HA	[redacted]
	Bield HA	[redacted]
[redacted]	Abbeyfield HA	[redacted]
[redacted]	Hanover HA	[redacted]
[redacted]	East lothian Tenants & Representatives Panel	[redacted]
[redacted]	Blue Triangle	[redacted]
[redacted]	Action for Children	[redacted]
[redacted]	The Rock Trust	[redacted]
[redacted]	The Bridges Project	[redacted]
[redacted]	Trust HA	[redacted]
[redacted]	Wheatley Group	[redacted]
[redacted]	Link HA Ltd	[redacted]
[redacted]	Castle Rock Edinvar HA	[redacted]
[redacted]	Melville HA	[redacted]
[redacted]	Oakridge	[redacted]
[redacted]	Hart / Cruden	[redacted]
[redacted]	Balfour Beatty	[redacted]
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		[redacted]
		[redacted]
		[redacted]
		[redacted]
[redacted]	Kingdom Housing	[redacted]
[redacted]	Frontline Fife	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	East Fife Federation	[redacted]
[redacted]	FFOTRA	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	GARF	[redacted]
[redacted]	Alba Investments	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Scottish Landlords	[redacted]
[redacted]	NHS	[redacted]
[redacted]	Fife HA	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Cambo Estate	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Greener Kirkcaldy	[redacted]
[redacted]	FFOTRA	[redacted]
[redacted]	Fife Council	[redacted]

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[redacted]	Fife Council	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Fife Council	[redacted]
[redacted]	Almond Housing Association	[redacted]
[redacted]	Home Group	[redacted]
[redacted]	Horizon Housing Association	[redacted]
[redacted]	Retties	[redacted]
[redacted]	City Lets	[redacted]
[redacted]	Cyrenians	[redacted]
[redacted]	West Lothian Council	[redacted]
[redacted]	West Lothian Council	[redacted]
[redacted]	West Lothian Council	[redacted]
[redacted]	Edinburgh Health & Social Care Partnership	[redacted]
[redacted]	Balerno Community Council	[redacted]
[redacted]	Colinton Community Council	[redacted]
[redacted]	Corstorphine Community Council	[redacted]
[redacted]	Craigentinny/Meadowbank	[redacted]
[redacted]	Craigleith/Blackhall Community Council	[redacted]

[redacted]	Craiglockhart Community Council	[redacted]
[redacted]	Craigmillar Community Council	[redacted]
[redacted]	Cramond & Barnton Community Council	[redacted]
[redacted]	Currie Community Council	[redacted]
[redacted]	Drum Brae Community Council	[redacted]
[redacted]	Drylaw/Telford Community Council	[redacted]
[redacted]	Fairmilehead Community Council	[redacted]
[redacted]	Firrhill Community Council	[redacted]
[redacted]	Gilmerton Inch Community Council	[redacted]
[redacted]	Gorgie/Dalry Community Council	[redacted]
[redacted]	Grange/Prestonfield Community Council	[redacted]
[redacted]	Granton & District Community Council	[redacted]
[redacted]	Hutchison/Chesser Community Council	[redacted]
[redacted]	Juniper Green Community Council	[redacted]
[redacted]	Kirkliston Community Council	[redacted]
[redacted]	Leith Central Community Council	[redacted]
[redacted]	Leith Harbour & Newhaven Community Council	[redacted]
[redacted]	Leith/Links Community Council	[redacted]
[redacted]	Liberton & District Community Council	[redacted]
[redacted]	Longstone Community Council	[redacted]
[redacted]	Marchmont and Sciennes Community Council	[redacted]
[redacted]	Merchiston Community Council	[redacted]
[redacted]	Morningside Community Council	[redacted]
[redacted]	Muirhouse/Salvesen Community Council	[redacted]

[redacted]	Murrayfield Community Council	[redacted]
[redacted]	New Town/Broughton Community Council	[redacted]
[redacted]	Northfield/Willowbrae Community Council	[redacted]
[redacted]	Old Town Community Council	[redacted]
[redacted]	Queensferry & District Community Council	[redacted]
[redacted]	Ratho & District Community Council	[redacted]
[redacted]	Sighthill/Broomhouse & Parkhead Community Council	[redacted]
[redacted]	Southside Community Council	[redacted]
[redacted]	Stenhouse, Saughton Mains & Whitson Community Council	[redacted]
[redacted]	Stockbridge/Inverleith Community Council	[redacted]
[redacted]	Tollcross Community Council	[redacted]
[redacted]	Trinity Community Council	[redacted]
[redacted]	West End Community Council	[redacted]
[redacted]	West Pilton/West Granton Community Council	[redacted]
[redacted]	Portobello Community Council	[redacted]
[redacted]	Edinburgh Affordable Housing Partnership	[redacted]
[redacted]	Ore Valley Housing Association	[redacted]
[redacted]	Richard Street	[redacted]
[redacted]	NAS Tech Construction	[redacted]
[redacted]	Ladybank Homes Ltd	[redacted]
[redacted]	AJ Stephens	[redacted]
[redacted]	Muir Homes	[redacted]
[redacted]	Keepmoat Homes	[redacted]
[redacted]	Ogilvie	[redacted]
[redacted]	The Newport Property Development Company	[redacted]
[redacted]	Allanwater Developments	[redacted]
[redacted]	Springfield Homes	[redacted]
[redacted]	Campion Homes	[redacted]

[redacted]	NHS Lothian	[redacted]
[redacted]	NHS Lothian	[redacted]
[redacted]	NHS Lothian	[redacted]

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

	Initial Default Estimate	Locally Adjusted Estimate
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)).

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

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

	Default	Adjusted
West Lothian	6,500	6,500

Existing Housing Need

3 **Existing Housing Need: Default Compared to Adjusted Estimates**

	Default	Adjusted
West Lothian	600	1,200

Based on local analysis, the Council propose alternative existing housing need information which includes:

- A count of homelessness 'live' cases at 31st March 2021 (Scottish Government homelessness data)
- An estimate of concealed *and* overcrowded household (SG estimate based on 2011 Census and Scottish Household Survey 2017-19)

West Lothian Council suggests a broader identification of homelessness through HL1 cases.

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 *and* 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.

4 **Flexibility Allowance**

West Lothian use the default flexibility allowance of 25%.

CORE PROCESSES ASSESSMENT

1 **Using the Response Template and Excel Calculator**

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.

2 **Housing Market Partnership and Stakeholders Involvement**

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

	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. 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. The HMP did not agree the adjusted estimate although confirmation of the reason was awaited.
3	**Joint Housing and Planning Senior Official Sign-Off** Senior planning and housing officers have signed-off the submission.
4	**Statistical Evidence** The Council have used well recognised sources of statistical evidence to support their case including: • NRS, 2018-based household projections (principal) • Scottish Government estimate of concealed *and* overcrowded households • Scottish Government 'live' homelessness cases
5	**Policy Evidence** The authority note that they are undertaking a Housing Needs and Demand Assessment in conjunction with other authorities in the South East of Scotland.

MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)

For the reasons specified above the proposed MATHLR is:

	MATHLR
West Lothian	**9,600**

Scottish Government Consultation on NPF4 Housing Figures Midlothian Council's Response May 2021

As NPF4 will form part of the statutory development plan for Midlothian, the Council welcomes the opportunity to engage in this important consultation and have the chance to consider any locally evidenced adjustments to the proposed housing figures. The Council's response addresses the four consultation questions set out in the Chief Planner's letter of 23 February 2021.

a. Initial Estimates and Assumptions

NPF4 will be a national spatial document (as well as a policy document) and as such the Council supports the identification of an all tenure approach to reflect the scale of the future housing need. The Council also supports the identification of a housing land requirement set by local authority area to meet local needs.

The consultation paper is clear that the proposed housing figures (6,450 new households and 8,050 unit equivalent land requirement with the 25% flexibility allowance) reflect the first two stages of the Housing Needs and Demand Assessment (HNDA) process and that further work is required to complete that process and identify what proportion of the proposed land requirement should be identified for affordable and market housing. The Council agrees with the statement in the consultation paper that issues regarding tenure will continue to be considered at the local level.

The Council is currently working with the SESplan Housing Market Partnership (HMP) to prepare a new HNDA (following the rejection of the second proposed Edinburgh and South East of Scotland Strategic Development Plan – SDP2) to inform the market and affordable housing requirements for the next Midlothian Local Development Plan (MLDP). The proposed figure for existing need is dated at March 2020. It includes an estimate of homeless households in temporary accommodation, overcrowded and concealed households (HoTOC). In preparing the new HNDA the SESplan HMP agrees, given the scale and importance of homelessness in calculating existing need across Edinburgh and the South East of Scotland, that the updated 2021 return should be used and the proposed housing figures recalculated.

The identification of "existing need" and "newly forming households" as part of the methodology is a better way of presenting the housing figures than referring to housing supply targets. In terms of the estimated number of new households, the proposed figures are broadly similar to those identified in the proposed SDP2 and the more recent interim Regional Spatial Strategy for Edinburgh and the South East of Scotland. The key difference is the increase in the flexibility allowance applied which has risen from 10% in SDP2 to 25% in NPF4. The reason given for the change is that it will reduce the risk to future delivery rates given the longer review periods for new style local development plans which will increase from five to ten

years. The Council acknowledges this reasoning but considers the percentage to be somewhat arbitrary.

The proposed figures are based on the latest National Records of Scotland (NRS) Household Projections 2018 (and the Government's count of existing need) and uses the Principle projection, not the lower or higher projection figure. The Council considers that using this mid-range projection is reasonable and appropriate, particularly given the ongoing uncertainty of the long term impact and recovery from the current pandemic and Brexit. The 2018 data was published in 2020 and represents the most up to date official data available and the Centre for Housing Market Analysis (CHMA) advises the use of official statistics wherever possible as they are robust and help to ensure consistency of approach.

b. Flexibility Allowance

The proposed flexibility allowance for urban areas of 25% is more than double the proposed level of flexibility in SDP2 (10%). The Council acknowledges that the proposed review period for the new style local development plans is double what it is currently (10 years as opposed to 5 years) and that this longer period may introduce more risk in terms of sustained delivery of the housing supply targets. However, other than this there is little explanation as to why the figure is set at 25%. The Council understands and accepts the principle of including a flexibility allowance in the overall land requirement but considers the figure somewhat arbitrary. A flexibility allowance of 20%, double that of SDP2, would be more consistent with the Government's explanation for the increase.

c. Proposed Land Requirement and Past Completions

The Council welcomes the acknowledgement in the consultation document of the need to focus on the delivery of housing land. The current SESplan targets are proving to be very challenging to the house building sector to achieve. The Council acknowledges that the proposed figures are generally consistent with recent completion rates but are realistic enough to be achievable given prevailing circumstances. The proposed land requirement is also higher than that identified in SDP2 but not of such a scale which would be unrealistic or unmanageable. The Council is not anti-development and would welcome additional house building where the corresponding infrastructure and facilities to support it were in place and where the proposed scale of development did not undermine place making principles or would result in a significant adverse environmental impact on an area.

d. Case for Locally Adjusted Estimates

Until the current HNDA process is concluded and we understand what the tenure split will be between market and affordable housing, the Council is generally supportive of the Government's approach and of the proposed land requirement figure. However, the Council notes that the option to submit a locally adjusted

element is restricted to upward adjustments only in apparent contradiction of the HNDA process and guidance.

The latest NRS population projections identify Midlothian as the fastest growing local authority area in Scotland, partly as a result of the current, extremely ambitious SESplan housing requirements. The scale of growth has proved challenging to manage but delivery has not kept pace with the targets. The Council supports the proposed housing figures for Midlothian, although still challenging they are more in line with recent completion rates and similar to the housing targets identified in SESplan 2.

The Council would not want to submit any adjustments at his stage.

National Planning Framework 4

Midlothian

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
Midlothian	8,050	8,050

The covering email to Midlothian's response noted that the Planning Committee agreed not to submit a locally adjusted estimate at this stage but did agree to feedback on the work.

The Council is generally supportive of the Government's approach and of the proposed land requirement figure, although still challenging they are in line with recent completion rates (10 year 6,271 units – Scottish Government completions) - Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot (www.gov.scot)).

The estimate exceeds the 10 year completions by nearly 2,000 units.

2 Household Projections (Newly-Forming Households)

The National Records of Scotland (NRS) 2018-based principal household projection is used by the Council. The authority notes that using this is reasonable and appropriate, particularly given the ongoing uncertainty of the long term impact and recovery from the current COVID-19 Pandemic and Brexit. They refer that the 2018 data was published in 2020 and represent the most up to date official data available.

The authority note that in terms of the estimated number of new households, the proposed figures are broadly similar to those identified in the proposed Strategic Development Plan 2 and the more recent interim Regional Spatial Strategy for Edinburgh and the South East of Scotland.

The household projection is 5,950.

Household Projection: Default Compared to Adjusted Estimates

	Default	Adjusted
Midlothian	5,950	5,950

3	**Existing Housing Need** **Existing Housing Need: Default Compared to Adjusted Estimates** See table below The Scottish Government default existing housing need estimate has been accepted by the Council and no adjustment is proposed.
4	**Flexibility Allowance** The Council uses 25% flexibility. However, they provide challenge to this. They do acknowledge that the proposed review period for the new LDP process will be double what it is currently and that this longer period may introduce more risk in terms of sustained delivery of Housing Supply Targets. However, they state that there is little explanation as to why the figure is set at 25% for urban authorities. The Council state they understand and accept the principal of including a flexibility allowance in the overall land requirement but are of the view that a flexibility allowance of 20% (which is double that of SESplan2) would be more consistent with SGs explanation for the increase. However, the Council does not seek to make any alteration.

	CORE PROCESSES ASSESSMENT
1	**Using the Response Template and Excel Calculator** As the council have not made any changes to the initial default estimate they have chosen not to submit an Excel calculator or a Response Template but instead a short 3 page submission.
2	**Housing Market Partnership and Stakeholders Involvement** There is no reported engagement with the HMP or stakeholders in respect of the estimate.
3	**Joint Housing and Planning Senior Official Sign-Off** Senior planning and housing officers have not signed-off the submission

Existing Housing Need: Default Compared to Adjusted Estimates

	Default	Adjusted
Midlothian	500	500

4	**Statistical Evidence** The Council accept all of the SG defaults and have therefore used the SG sources of statistical evidence to make their case including: • NRS 2018-based household projection (principal) • Scottish Government estimate of existing housing need
5	**Policy Evidence** The authority note that are currently working with the SESplan Housing Market Partnership to prepare a new Housing Need and Demand Assessment (HNDA) to inform the next LDP.

MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)

For the reasons specified above the proposed MATHLR is:

	MATHLR
Midlothian	8,050

Indicative Local Housing Land Requirements (as at 21 August 2025)

PA	MATHLR	iLHLR	Diff	% diff	Status
Aberdeen City	7,000	8,750	+1,750	+25%	First ER at Gate Check stage
Aberdeenshire	7,550	12,740	+5,190	+69%	First ER at Gate Check stage
Dumfries & Galloway	4,550	6,355	+1,805	+40%	First ER returned to PA
East Dunbartonshire	2,500	2,700	+200	+8%	Second ER at Gate Check stage (first ER withdrawn)
East Lothian	6,500	6,660	+160	+2.5%	Second ER returned to PA (first ER withdrawn)
East Renfrewshire	2,800	3,100	+300	+11%	First ER Passed Gate Check; Preparing Proposed Plan
Falkirk	5,250	6,100	+850	+16%	First ER Passed Gate Check; Preparing Proposed Plan
Fife	7,300	9,000	+1,700	+23%	Second ER at Gate Check Stage (iLHLR figure of 9,430 in first ER)
Glasgow	21,350	22,569	+1,219	+6%	Second ER passed Gate Check; Preparing Proposed Plan (iLHLR figure of 22,000 in first ER)
Inverclyde	1,500	1,850	+350	+23%	First ER returned to PA
Midlothian	8,850	8,851	+1	+0.01%	First ER Passed Gate Check; Preparing Proposed Plan
Moray	3,450	3,730	+280	+8%	First ER Passed Gate Check; Preparing Proposed Plan
Orkney Islands	1,600	1,345	-255	-16%	First ER at Gate Check stage
Perth & Kinross	8,500	8,700	+200	+2.3%	First ER returned to PA
Stirling	3,500	4,350	+850	+24%	First ER Passed Gate Check; Preparing Proposed Plan
West Lothian	9,850	12,500	+2,650	+27%	First ER at Gate Check stage

	+17,250	

PA = Planning Authority

MATHLR = Minimum All-Tenure Housing Land Requirement

iLHLR = indicative Local Housing Land Requirements

ER = Evidence Report

Planning and Housing Data Review

August 2024

Geographic Information Science and Analysis Team
Scottish Government

Introduction

This note draws on the best available data to answer four key questions on the theme of planning and housing:

1. How much land is allocated for housing development, and can we quantify this in terms of housing units?
2. How many housing units have been consented?
3. How many housing units have been completed?
4. What is the gap between the amount consented and the amount completed?

Each section also includes a brief summary of the data sources, limitations, and some **planned and potential data improvements** which could help to answer these important questions more fully.

1. How much land is allocated for housing development, and can we quantify this in terms of housing units?

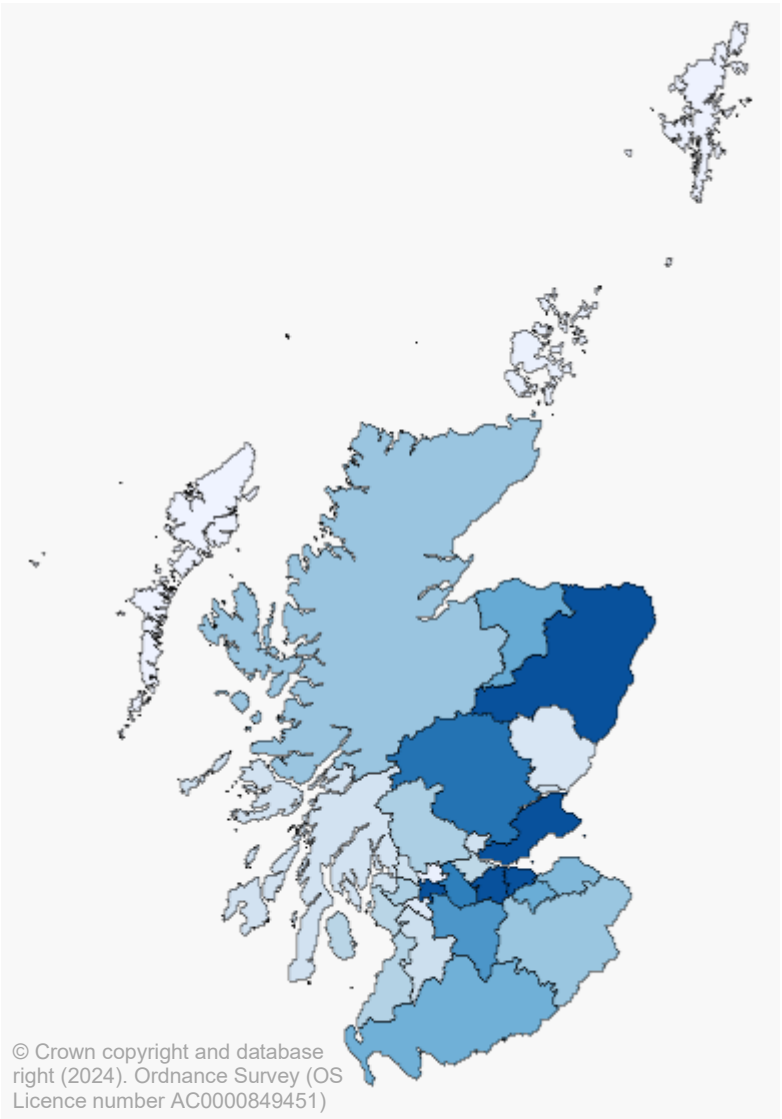
The table and map below show the **established supply** of housing for each local authority.

The established supply is the total housing land supply - **including both unconstrained and constrained sites**. This will include the effective housing land supply, plus the remaining capacity for sites under construction, sites with planning consent, sites in adopted local development plans and where appropriate other buildings and land with agreed potential for housing development

Adding up each authority's figures we find that **the national established supply** is **around 344,000 housing units**.

Local Authority	Established supply (housing units)
Aberdeen and Aberdeenshire	45,662
Glasgow City	34,832
Fife	33,936
West Lothian	24,231
City of Edinburgh	22,679
Perth and Kinross	18,593
North Lanarkshire	17,318
South Lanarkshire	14,543
Moray	12,192
Midlothian	11,799
Dumfries and Galloway	11,423
East Lothian	10,399
Highland	8,757
Scottish Borders	8,715
Renfrewshire	7,608
South Ayrshire	7,130
North Ayrshire	6,767
Falkirk	6,405
East Ayrshire	5,000
West Dunbartonshire	4,793
Inverclyde	4,773
Clackmannanshire	4,619
Dundee City	4,408
Argyll and Bute	4,372
Angus	3,696
East Renfrewshire	3,143
East Dunbartonshire	1,778
Orkney Islands	1,670
Shetland Islands	1,414
Na h-Eileanan an Iar	1,298

Established supply of housing, by Authority



Source: most recently available authority Housing Land Audits

Key data sources to answer this question

- Housing Land Audits (current)
- Improvement Service Housing Land Supply Spatial Data (*in development*)

Limitations and future developments

Here we face two issues:

1. Currently, each authority completes their Housing Land Audit in their own unique way, using different definitions, processes and data sources. This makes it difficult to understand the picture across authority boundaries and at a national level. This is especially true of creating a national map of *effective supply* – land which is judged to be developable more immediately

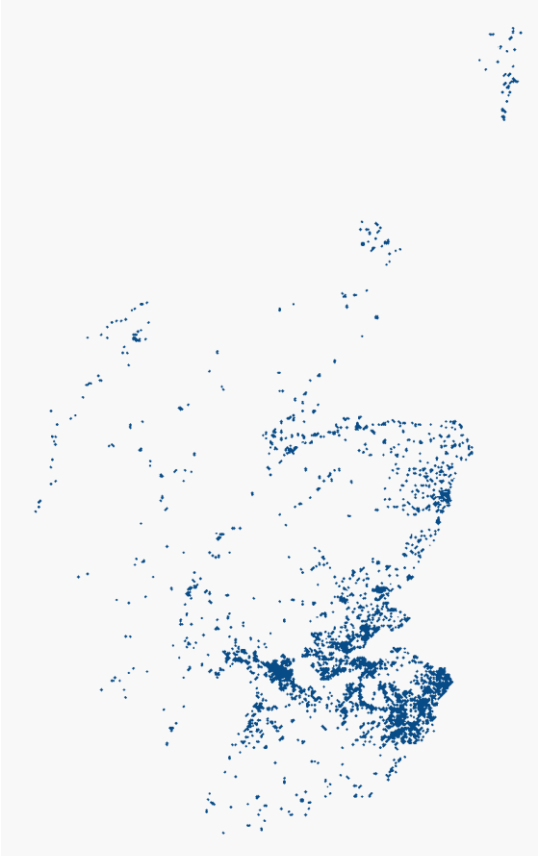
2. Many authorities do not collect and publish comprehensive data at the site level. This makes it difficult to quickly and effectively ask more detailed questions like:
    a. how much supply do we have in areas of deprivation? or
    b. how much of our supply is in the catchments of schools that are over capacity? or
    c. how much of our supply is currently within a 20-minute drive of the rail network?

The Improvement Service has begun collecting, directly from Local Authorities, a standardised, site-level spatial version of the land supply. The map to the right shows the sites which are currently included.

This data, when fully cleaned and published as open data, would unlock the kind of analysis that we would like to undertake, and support effective monitoring.

We are working with the Improvement Service to support the development of this important dataset.

We are also working to support the refreshed Housing Land Audit guidance, to facilitate the standardisation of data and analyses within the audit process.

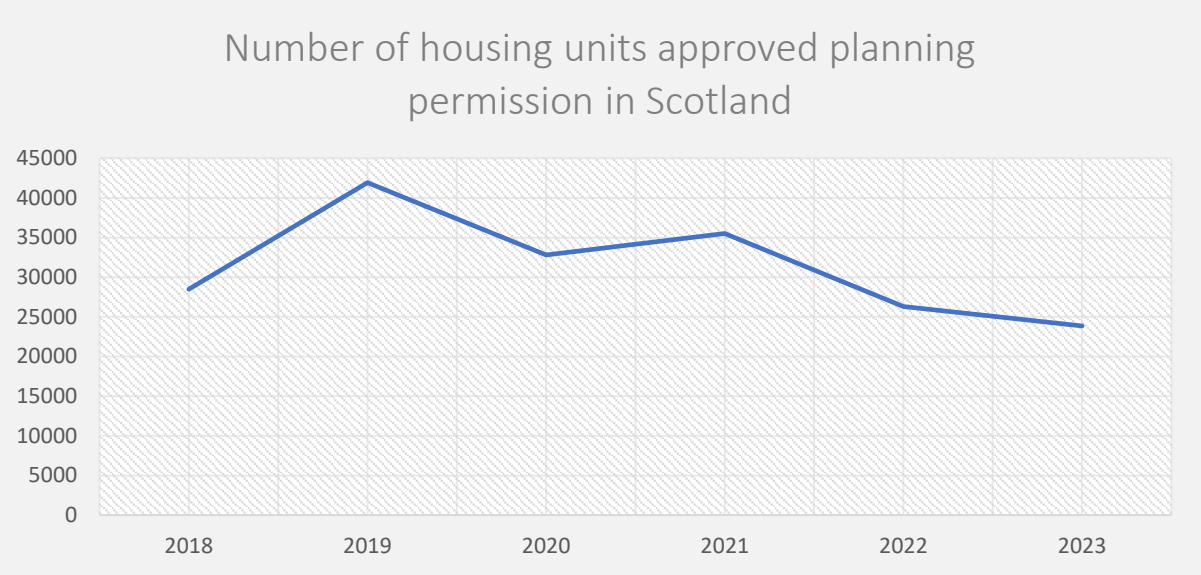


Sites currently in the Improvement Service's Housing Land Supply spatial database

2. How many units have been consented?

To answer this question we currently have to turn to non-official sources of data. As is the case in England and Wales[1], the best current source of this data is Glenigan, a sales and marketing company.

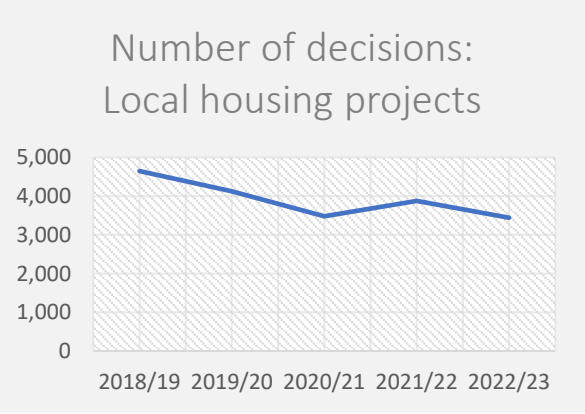
Glenigan's data shows that the total number of units of housing approved permission in Scotland reached a peak in 2019 at 41,932 approvals, decreasing to around **24,000 approved housing units in 2023**.

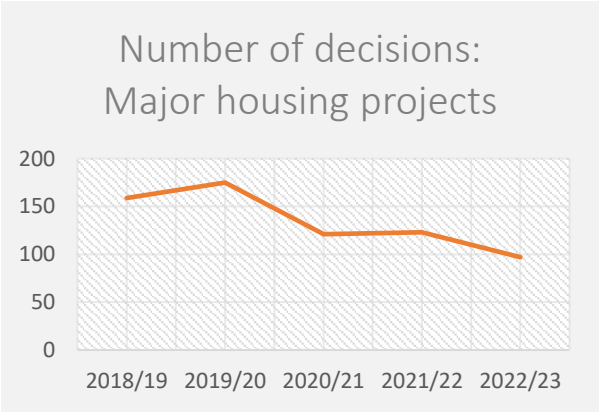


Data: Glenigan data (New housing pipeline)

We do have official statistics on the **number of planning applications** for both local housing developments (*1-49 houses*) and major housing developments (*50+*).

These figures show that the total number of planning applications decreased over the past five years for both local and major housing developments. Interestingly, local developments did not see the same peak in 2019 that we saw in the number of major developments and the overall number of units.



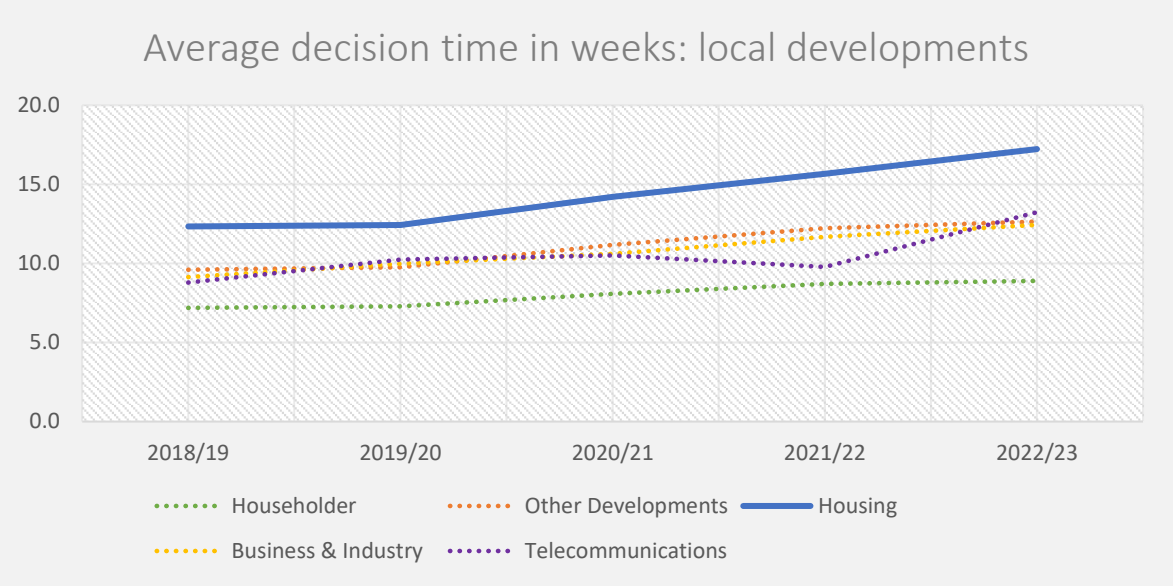


Data: SG Planning Statistics

[1] Housebuilding market study - GOV.UK (www.gov.uk)

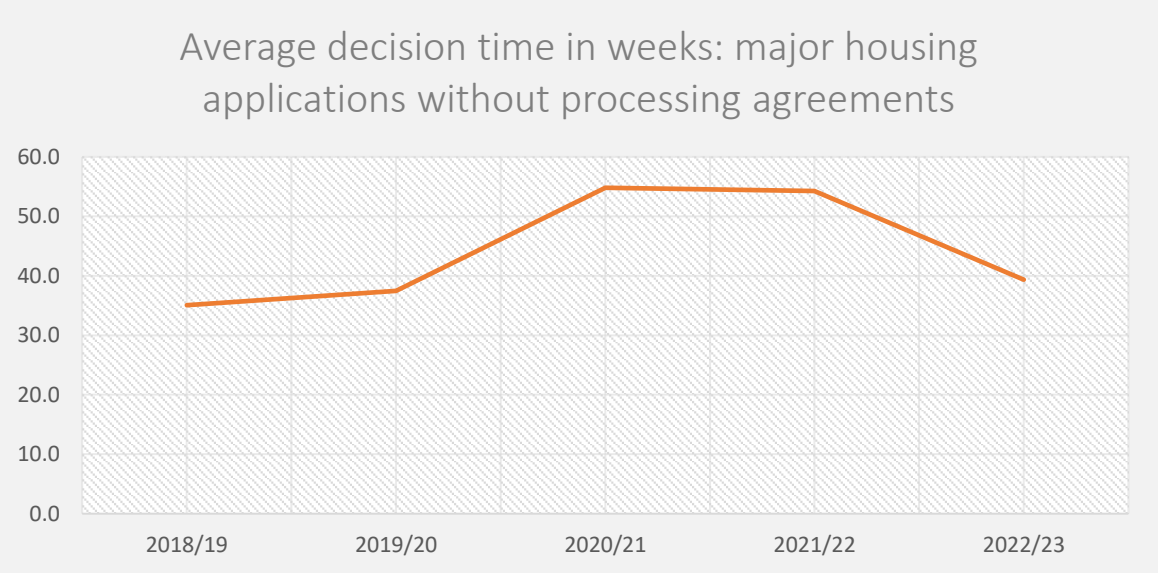
The official statistics also monitor the amount of time that each authority takes to reach these decisions.

Decision times for **local housing developments** have been slowly increasing since the pandemic from around 12 weeks to 17 weeks.



Data: SG Planning Statistics

Decision times for **major housing developments** also increased significantly during the pandemic but decreased to around 40 weeks in 2022/23.



Data: SG Planning Statistics

Key data sources to answer this question

- SG Planning Statistics (current)
- Glenigan (current)
- Improvement Service Cloud Connector planning applications (*in development*)

Limitations and future developments

As shown, we are currently able to monitor approvals at the national and regional level, albeit by relying on imperfect unofficial data for a part of that picture.

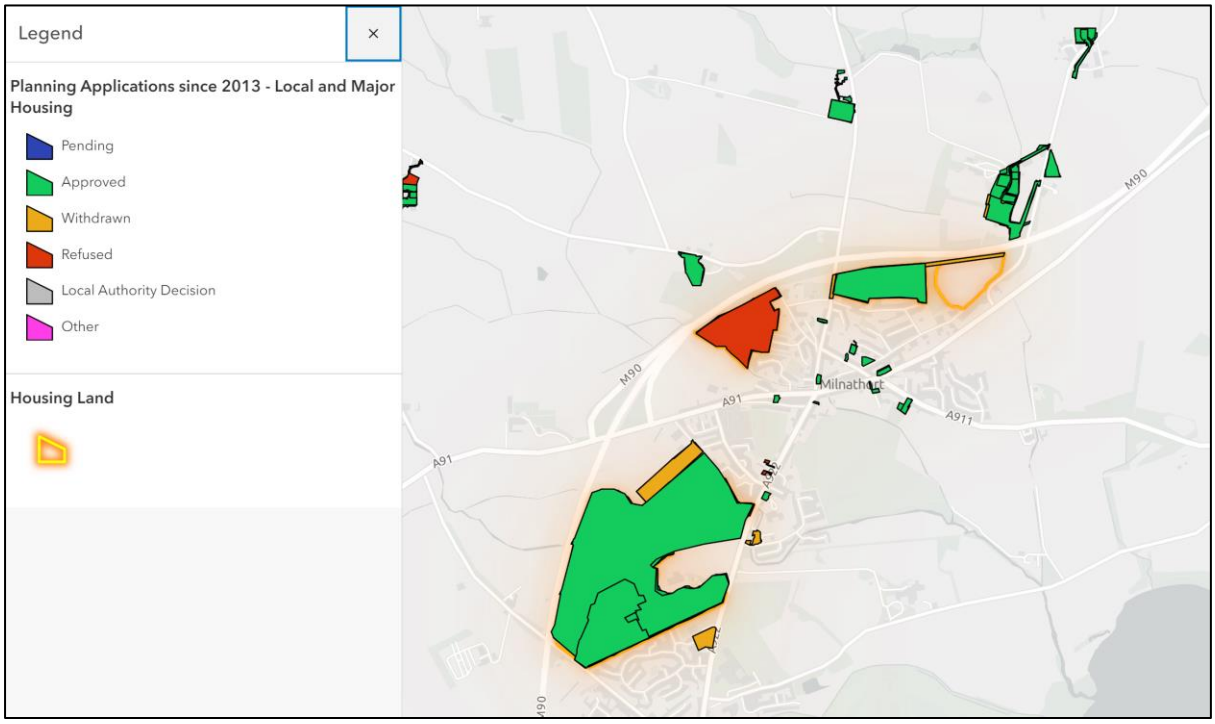
However, there are a number of developments in the pipeline which will significantly improve our ability to monitor and improve the system.

Most significantly, the Improvement Service is currently developing its Cloud Connector planning applications data, which gives us a live view into each authority's planning application case management systems.

This data underpins the development of a national Planning Digital Twin, which will enable us to monitor the progress of every planning application (rather than simply those larger construction projects which Glenigan focuses on).

As the screenshot below shows, this new data covers all applications, including those subsequently withdrawn and refused, which is key to understanding the functioning of the system at every level from individual sites to the national picture.

The data could also be linked to completions data to allow for monitoring throughout the pipeline.



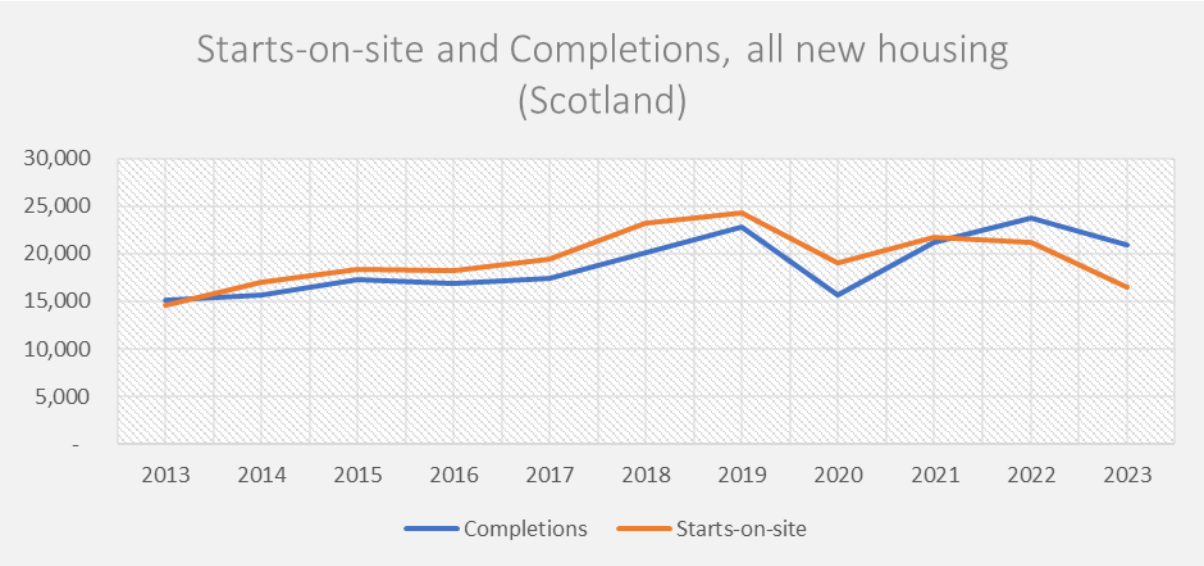
The Cloud Connector data gives us a live view from authority casework systems, showing all applications including those still pending, and applications which have been withdrawn or refused

3. How many units have been completed / built out?

We have official statistics on the number of starts-on-site and completions of housing units. This data can be broken down by authority and tenure (private, social, etc). Separate monitoring is available for the affordable homes supply programme.

Looking at the top level, we can see that the number of **starts on site** and **completions** tend to follow one another, with drops in both 2020 and 2023.

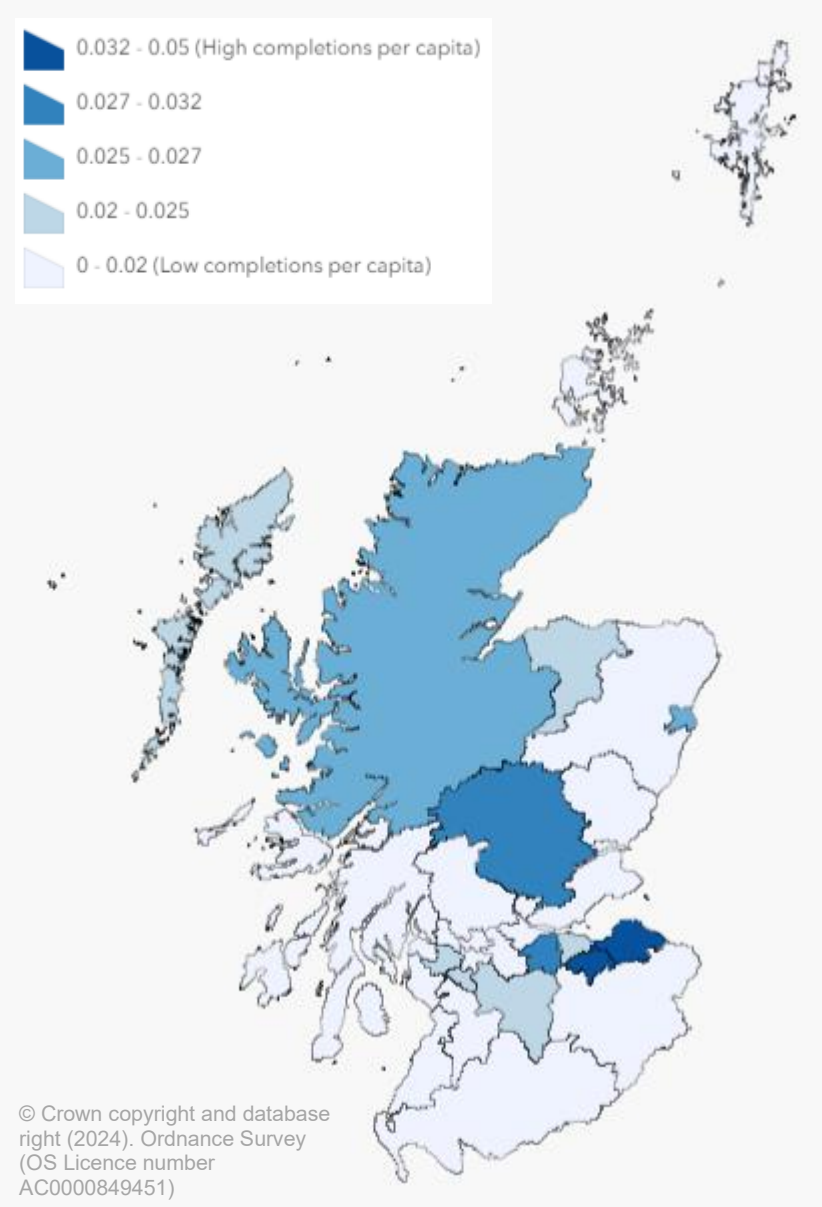
Interestingly, the annual number of starts-on-site fell below the number of housing completions in 2022 and **the total number of starts-on site fell again to 16,445 in 2023**.



Data: SG Housing Statistics

As ever, we do need to take care when looking at the national level because there is significant regional and local variation. The map below shows the number of new houses completed over the past five years per capita, for each local authority area.

Per capita completions of new homes, 2018 - 2023



Data: SG Housing Statistics, NRS

We can see that the delivery of new housing does vary by local authority, with the highest delivery of houses per capita seen in the authorities surrounding (but not including) Edinburgh.

Of course, even this authority level view will mask the detailed local picture – the residents of Kinross may not feel that housing completions in Perth have much bearing on their ability to find a home.

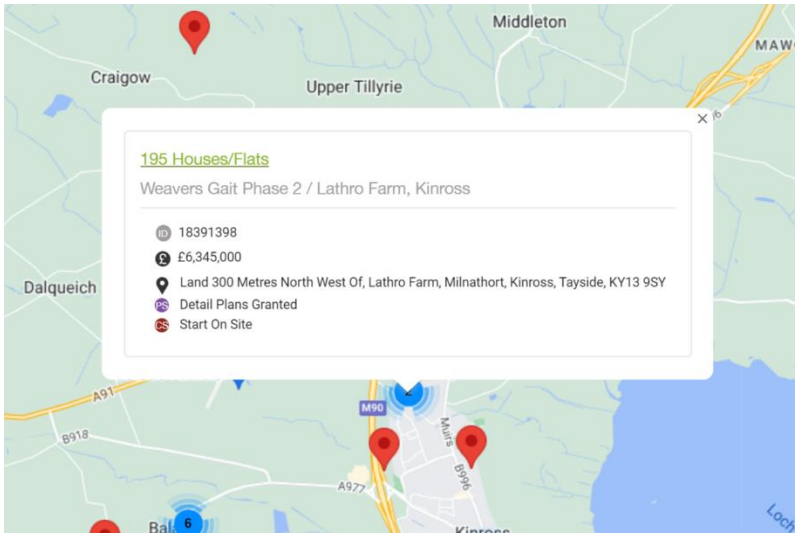
Key data sources to answer this question

- SG Housing Statistics (current)
- Glenigan *(potential)*
- Housing Land Audits *(potential)*
- Other underutilised data sources *(potential)*

Limitations and future developments

We are very lucky to benefit from rich official monitoring in the form of the SG Housing statistics.

However, the key limitation for planning is the limited ability to monitor individual applications from approval to completion to help answer questions like “which applications are not being built out - can we identify any trends?” and “to what extent does what was approved match with what was built?”.



An example of the kind of detail included in Glenigan’s site monitoring

Glenigan’s data offers one potential route to developing our monitoring in this area.

The Scottish Government has full access to Glenigan’s construction pipeline monitoring platform, which provides site level monitoring of larger construction projects through the planning / construction pipeline.

Housing Land Audits offer another potential route for collecting site-level construction information, if we are able to identify ways to support authorities to more efficiently collect standardised monitoring information on the progress of housing land sites, without placing additional burden on their limited resources.

For example, we also have access to a range of novel and underused data sources that could be used to aid monitoring the build out of planning applications.

This includes automatic building detection using satellite imagery and machine learning.

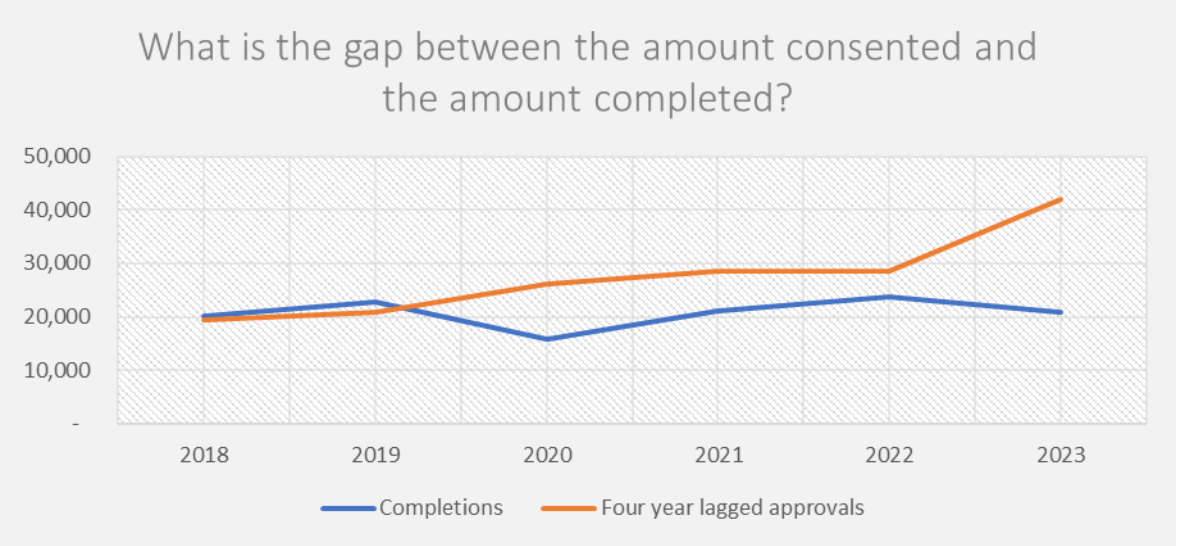
Two areas of housing land, construction work automatically detected in the western site using Ordnance Survey data, provided through the PSGA

4. What is the gap between the amount consented and the amount completed?

There are many ways to approach this question, which is more complicated than it might first seem. However, at its simplest we can create a useful, very loose approximation by simply combining the data that we have on housing approvals with the data on housing completions and comparing the difference.

To make this a little more realistic, we have shifted the approvals forward by four years. This is to reflect the fact that it takes a few years for a housing development to go from planning approval to completion. In other words, we saw that planning approvals peaked in 2019, and so we could expect to see a peak of housing completions four years later in 2023.

The orange line on the chart below shows these four-year-shifted approvals and represents "*what would have happened if every unit of housing consented was completed exactly four years later*". The second line, in blue, shows what actually happened.



Data: Glenigan data (New housing pipeline), SG Housing Statistics

Using this metric we can say that between 2018 and 2022 **the number of units approved was around 11% higher than the number of units completed**.

This matches what has been observed in other areas for non-completions in normal times - in London it has been estimated[2] that between 10 and 20% of approvals are not built out. However, we have seen the two lines diverge somewhat over the past year, as 2023 completions dropped despite 2019 having been a bumper year for approvals. This matches with evidence from other areas on the effect of times of financial difficulty on non-completion of housing projects, increasing the number of non-completions.

[2] Taking Stock: The geography of housing need, permissions and completions (lichfields.uk)