

Annex 9: Localised Housing Issues (including empty homes, second homes, short term lets, houses in multiple occupation and rural living)

ANNEX 9: LOCALISED HOUSING ISSUES (INCLUDING EMPTY HOMES, SECOND HOMES, SHORT TERM LETS, HOUSES IN MULTIPLE OCCUPATION AND RURAL LIVING)	1
Legislative Requirements	2
NPF4 LDP Requirements	3
Links to Evidence	4
SUMMARY OF EVIDENCE - FIFE WIDE	5
Introduction	5
Fife Wide Overview	5
Empty Homes	6
Second Homes	12
Houses in Multiple Occupation (HMOs)	15
Short-term Lets (STLs)	16
Rural Living	23
Summary of Evidence – North East Fife	24
Houses in Multiple Occupation (HMOs)	24
Second Homes	25
Short Term Lets (STLs)	25
Housing for Further and Higher Education	27
Rural Living	27
Summary of Stakeholder Engagement	29
Empty Homes Survey	29
Short Term Lets Survey & Workshop	30
Meeting with the Association of Scotland’s Self-Caterers	31
Summary of Implications for the Proposed Plan	32
HMOs	32
Short Term Lets & Second Homes	32
Rural Homes	32
Housing for Further and Higher Education	33
Statements of Agreement/Dispute	33

Legislative Requirements

Table 1: Information required by the Act regarding the issues addressed in the housing sections

Town and Country Planning (Scotland) (Act) 1997, as amended:
Section 15(5)
<p><i>(ca) the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people,</i></p> <p><i>(cb) the availability of land in the district for housing, including for older people and disabled people,</i></p> <p><i>(cf) the extent to which there are rural areas within the district in relation to which there has been a substantial decline in population.</i></p>
Section 16(2):
<p><i>(ab) are to have regard to the list published under section 16E of persons seeking to acquire land in the authority's area for self-build housing.</i></p>
Section 16B(3):
<p>(b)(i) the Evidence Report must set out a summary of the action taken by the planning authority to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority's area, and an analysis of the extent to which the action has helped to meet those needs.</p>

Source: *Town and Country Planning (Scotland) (Act) 1997, as amended*

Table 2: Information required by the Associated Acts regarding the issues addressed in the housing sections

Associated Acts:
The Local Housing Strategy is required by the Housing (Scotland) Act 2001 , as amended, to be informed by an assessment of housing provision that is carried out by a Housing Needs & Demand Assessment.

Source: Housing (Scotland) Act 2001

Table 3: Information required by the Associated Regulations regarding the issues addressed in the housing sections

Associated Regulations:
The Town and Country Planning (Development Planning) (Scotland) Regulations 2023, Regulation 9(2)
(2) The information and considerations are –
(e) the following plans and strategies, insofar as relating to the local development plan area –
(ix) any local housing strategy *
* “local housing strategy” means a strategy (and any modified strategy) prepared and submitted to the Scottish Ministers in accordance with section 89 of the Housing (Scotland) Act 2001

Source: The Town & Country Planning (Development Planning) (Scotland) Regulations 2023

NPF4 LDP Requirements

NPF4 Policy 16:

- LDPs are expected to identify a Local Housing Land Requirement for the area they cover. This is to meet the duty for a housing target and to represent how much land is required. To promote an ambitious and plan-led approach, the Local Housing Land Requirement is expected to exceed the 10-year [Minimum All- Tenure Housing Land Requirement \(MATHLR\) set out in Annex E \(of NPF4\)](#).
- Deliverable land should be allocated to meet the 10-year Local Housing Land Requirement in locations that create quality places for people to live. Areas that may be suitable for new homes beyond 10 years are also to be identified. The location of where new homes are allocated should be consistent with local living including, where relevant, 20-minute neighbourhoods and an infrastructure first approach.
- Diverse needs and delivery models should be taken into account across all areas, as well as allocating land to ensure provision of accommodation for Gypsy/Travellers and Travelling Showpeople where need is identified.

NPF4 Policy 17:

- LDPs should be informed by an understanding of population change over time, locally specific needs and market circumstances in rural and island areas.
- LDPs should set out tailored approaches to rural housing and where relevant include proposals for future population growth – including provision for small-scale housing and the appropriate resettlement of previously inhabited areas. Plans should reflect locally appropriate delivery approaches. Previously inhabited areas that are suitable for resettlement should be identified in the spatial strategy.

Links to Evidence

Scottish Government:

[Impact of STLs on communities](#)

Fife Council:

SHIP

[Strategic Housing Investment Plan \(SHIP\) 2023/24 - 2027/28](#)

Empty Homes

[Number of unoccupied/long term empty homes](#) (source: Fife Council Assessors)

HMOs

[HMOs - Review of Overprovision Policy Committee Report, May 2023](#)

Short-term Lets

STL Update committee report, [March](#) 2023 & committee [minute](#)

[Short-Term Lets Register](#)

Summary of Evidence - Fife Wide

Introduction

A9.1. A range of other pressures arise from the use of existing housing for alternative uses, adding to housing need and demand. As of September – October 2023 Fife had:

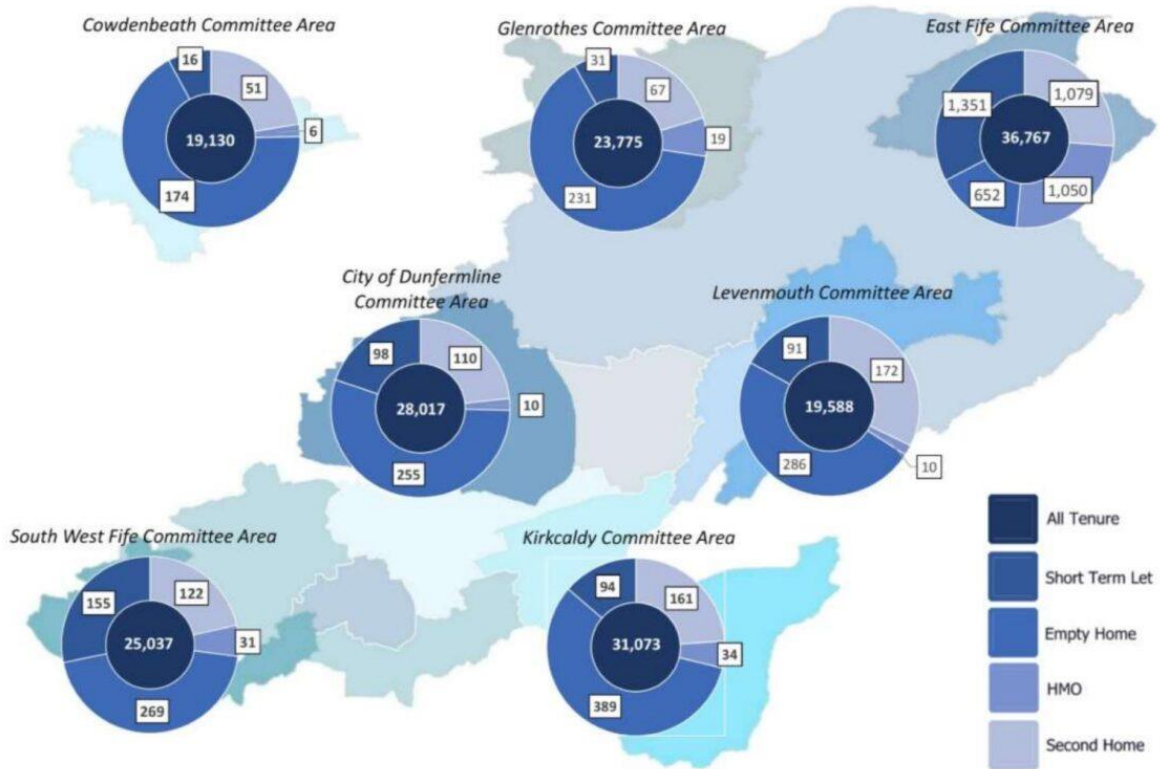
Empty Homes 2,256 empty homes	Second Homes 1,762 second homes	HMOs 1,160 HMOs	Short-term Lets 1,836 STLs
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A9.2. Access to quality, affordable housing is closely linked to addressing poverty, as housing costs are the main household expenditure for lower income households. Increased competition in the residential market including competition from buyers for second homes and short-term lets operating as a business, can impact on availability and affordability of homes.

Fife Wide Overview

A9.3. Figure 1 below provides an overview of all tenures per area committee. It highlights the number of short term lets, empty homes, houses in multiple occupation and second homes per committee area. Each tenure is discussed in turn below.

Figure 1: Fife Wide Tenure Overview



Source: Fife Council data (Assessors & Housing Services)

Empty Homes

A9.4. There are currently 2,256 empty homes (empty longer than 6 months) in Fife. Split by Local Housing Strategy (LHS) areas, these were located in:

Table 4: Empty Homes by LHS Area

LHS Area	Empty Homes	All Tenure	%
Cowdenbeath	155	17,249	0.9
Cupar & Howe	148	10,654	1.4
Dunfermline	415	43,955	0.9
Glenrothes	221	22,856	0.9
Kirkcaldy	441	35,385	1.2
Largo & East Neuk	187	8,942	2.1
Levenmouth	236	17,483	1.3
St Andrews	234	12,287	1.9
Taycoast	120	6,429	1.9
West Villages	99	8,147	1.2
Grand Total	2,256	183,387	1.2

Source: Fife Council - Council Tax Records, September 2023

- A9.5. The spatial distribution and clustering of empty homes is mapped [here](#). Interactive mapping is also available [here](#).
- A9.6. Fife Council's Empty Homes service has been in place since 2014. Primarily the service offers advice and assistance to owners in bringing their long-term empty properties back into use, but also attempts to apply pressure to those owners who may be reluctant to do this. It offers advice on renting, selling and the refurbishment of properties. Between the introduction of the Empty Homes service and March 2022, assistance has helped owners to bring 449 properties back into residential use. Through the lifetime of the LHS 2022-2027, it is anticipated 175 homes could potentially be brought back into use over the 5-year period (35 per annum) which will help increase overall housing supply.
- A9.7. Various routes to bring empty homes back into use are being used including the following:
- The Empty Homes Matchmaker scheme which puts owners in touch with potential buyers.
 - The Empty Homes Loan scheme, funded by the Scottish Government, which provides funding for the purchase or sale of an empty property.
 - Collaboration with the Housing Service Property Acquisitions team to identify empty properties for purchase by the Council.

- Working with the YMCA Glenrothes on a project which assists them in identifying long term empty properties for purchase.
- Roll out of a successful pilot project undertaken in 2021 where an in-depth look at private sector residential properties in one specific area identified empty properties.
- A pilot project is underway involving working with a genealogist company to track down missing owners.

A9.8. An overview of the numbers of empty homes brought back into use over the last 3 years is included in Appendix 2 of the SHIP (see extract below). [Fife SHIP 2023/24 - 2027/28](#)

Table 5: Number of Properties Brought Back into Use

Year	Length of Time Homes have been Empty					TOTAL
	Less than 1 year	Between 1 & 2 years	Between 2 & 5 years	Between 5 & 10 years	More than 10 years	
2019/20	0	8	22	2	5	37
2020/21	3	6	18	8	4	39
2021/22	0	8	17	11	5	41

Source: [Fife SHIP 2023/24 - 2027/28](#)

Table 6: 2019/20 Routes Used to Help Bring Properties Back into Use

Routes	No. of properties	Funding used
Sold through matchmaker	1	No additional funding required
YMCA Glenrothes Scheme	2	External grant funding raised by YMCA Glenrothes
Given support to access VAT discounts, merchants & services discounts, other discounts	12	No additional funding required
Provided help and support to obtain Council Tax discretion which enabled the owner to bring the property up to standard	18	No additional funding required
Provided facilitation, problem solving, partnership working (help with communal repairs, renovation, sweat equity etc)	11	No additional funding required

Source: [Fife SHIP 2023/24 - 2027/28](#). Note: there can be numerous routes per property

Table 7: 2020/21 Routes Used to Help Bring Properties Back into Use

Routes	No. of properties	Funding used
Purchased through Buyback scheme	2	Scot Govt grant funding of £40k per property acquired. / Any work carried out to property to bring back up to standard comes out of Voids budget /Funding to purchase property comes from HRA Acquisitions budget.
Sold through matchmaker	5	No additional funding required
Advice and information given to owner	9	No additional funding required
Given support to access VAT discounts, merchants & services discounts, other discounts	12	No additional funding required
Provided help and support to obtain Council Tax discretion which enabled the owner to bring the property up to standard	9	No additional funding required
Provided facilitation, problem solving, partnership working (help with communal repairs, renovation, sweat equity etc)	11	No additional funding required

Source: [Fife SHIP 2023/24 - 2027/28](#) Note: there can be numerous routes per property

Table 8: 2021/22 Routes Used to Help Bring Properties Back into Use

Routes	No. of properties	Funding used
Sold through matchmaker	4	No additional funding required
Scottish Government Empty Homes Loan Scheme	1	£20K - Scottish Government Empty Homes loan fund
Purchased through Buyback scheme	5	Scot Govt grant funding of £40k per property acquired / Any work carried out to property to bring back up to standard comes out of Voids budget / Funding to purchase property comes from HRA Acquisitions budget
YMCA Glenrothes Scheme	2	External grant funding raised by YMCA Glenrothes
Given support to access VAT discounts, merchants & services discounts, other discounts	12	No additional funding required
Provided help and support to obtain Council Tax discretion which enabled the owner to bring the property up to standard	18	No additional funding required
Advice and Information given to owner about renting or selling	4	No additional funding required
Provided facilitation, problem solving, partnership working (help with communal repairs, renovation, sweat equity etc)	11	No additional funding required

Note: there can be numerous routes per property

Source: [Fife SHIP 2023/24 - 2027/28](#)

A9.9. Fife Council has set aside £15 million from 2022-25 for the acquisition of former local authority and privately owned properties on the open market to supplement the affordable housing programmes and increase social housing levels. The £15 million has the potential to deliver an additional 250 Council homes, although the

number will be subject to house prices and the extent of available subsidy assistance.

A9.10. Additional initiatives which are being considered and developed for the future include:

- Use of Compulsory Purchase Orders where necessary and as a last resort – research/discussion is ongoing as to whether Fife Council would consider this option and in what circumstances.
- Working with Temporary Accommodation and Homelessness teams to explore how Empty Homes could have role in the prevention of homelessness/Rapid Rehousing Transition Plan (RRTP).
- Linking in with town centre redevelopment and regeneration projects

Second Homes

A9.11. In total, 1,762 homes within Fife are listed as second homes, which represents around 0.96% of the total housing stock. The largest concentration of second homes is in the Largo & East Neuk LHS area (8.8%).

Table 9: Second Homes by LHS Area

LHS Area	Second Homes	All Tenure	%
Cowdenbeath	49	17,249	0.3
Cupar & Howe	85	10,654	0.8
Dunfermline	185	43,955	0.4
Glenrothes	66	22,856	0.3
Kirkcaldy	170	35,385	0.5
Largo & East Neuk	790	8,942	8.8
Levenmouth	88	17,483	0.5
St Andrews	214	12,287	1.7
Taycoast	72	6,429	1.1
West Villages	43	8,147	0.5
Grand Total	1,762	183,387	0.96

Source: Fife Council Assessors, September 2023

- A9.12. The spatial distribution and clustering of second homes is mapped [here](#). Interactive mapping is also available [here](#).
- A9.13. Funding received from second homes council tax has been committed to affordable housing projects to further enhance Scottish Government funding programmes. Since this was introduced, £23.977m has been collected between 2005/06 and 2021/22, with a further estimated £1.1m expected to be generated each year from 2022/23 – 2027/28. Much of this has been and will continue to be allocated to support affordable housing projects.
- A9.14. The table below details the amount of second home council tax that has been collected and how it contributed to the provision of affordable housing in Fife.

Table 10: Second Homes Council Tax

Year	Tax Raised (£m)	Tax Spent (£m)	Units Delivered
Pre 2020/21	£20.130m	£14.977m	1,253
2020/21	£1.935m	£1.100m	78
2021/22	£1.913m	£1.450m	129

Source: [Fife SHIP 2023/24 - 2027/28](#)

- A9.15. The use of second homes council tax monies will assist the affordable housing programme in allowing more projects to be delivered than would otherwise be possible. In 2018, the Council decided to allocate future second homes council tax to council social rented projects only.
- A9.16. The estimated number of units that could be delivered based on the funding available from the combined Affordable Housing Supply Programme and second homes council tax (2HCT) funding is shown in the table below.

Table 11: No. of units deliverable

Tenure	Funding Available RPAs & 2HCT (£m)	Benchmark Grant per Unit	Units Deliverable	% of total units
FC SR	£65.732m	£71,500	919	34%
FC (OMT)	£12.096m	£40,000	302	10%
HA SR	£87.223m	£78,000	1,118	41%
HA MMR	£21.738m	£53,500	406	15%
Totals	£186.789m	-	2,746	100%

Assumptions: -

1. Proportionate split of units delivered (56% – HAs; 44% – FC)
2. New Benchmark grants at 3-pe as detailed in the letter dated 29/10/21
3. Target of 20% MMR as per LHS identified need (section 4.3)

Source: [Fife SHIP 2023/24 - 2027/28](#)

Houses in Multiple Occupation (HMOs)

A9.17. There are currently 1,160 premises listed as HMOs in Fife, the majority being located within St Andrews (1,043 premises, 90% of all HMOs).

Table 12: Houses in Multiple Occupation by LHS Area

LHS Area	HMOs	All Tenure	%
Cowdenbeath	6	17,249	0.03
Cupar & Howe	6	10,654	0.06
Dunfermline	40	43,955	0.09
Glenrothes	19	22,856	0.08
Kirkcaldy	34	35,385	0.09
Largo & East Neuk	1	8,942	0.01
Levenmouth	10	17,483	0.06
St Andrews	1043	12,287	8.49
Taycoast	0	6,429	0
West Villages	1	8,147	0.01
Grand Total	1,160	183,387	0.63

Source: Fife Council Housing Services HMO Register, 2023

A9.18. HMOs are a key element of the private rented sector, which itself plays a significant role in meeting housing needs. The demand for HMO accommodation is particularly high in St. Andrews compared to most other parts of Fife. This high demand is linked to the accommodation needs of St Andrews University Students. The number of HMOs in St Andrews LHS Area is 1,043, however within St Andrews Ward this number is 1,039 which is relevant in relation to the HMO Overprovision policy.

A9.19. It is worth noting that not all HMO premises should be considered as available stock, with 40% of HMOs used primarily for special purposes as shown in table 13 below.

Table 13: Houses in Multiple Occupation by Property Use

HMO Property Use	Count	Occupancy
HMO – Flats or houses let as a whole	703	2,866
HMO – Student Halls of Residence	403	4,361
HMO – Supported Accommodation	27	110
HMO – Other Employee Residences	11	73
HMO – Hostels (Local Authority & Charity)	8	96
HMO – B&B, Hotels & Guesthouses	3	26
HMO – Landlords with Lodgers	3	12
HMO – Sheltered Accommodation	2	12
Grand Total	1,160	7,556

Source: Fife Council Housing Services HMO Register, 2023

A9.20. The spatial distribution and clustering of HMOs is mapped [here](#). Interactive mapping is also available [here](#).

Short-term Lets (STLs)

A9.21. The Scottish Government in 2019 commissioned research into the [impact of short-term lets on communities across Scotland](#). The research provided a snapshot figure of properties advertised through active Airbnb listings by local authority area in May 2019. Of the 22,063 properties in Scotland listed as offering an 'entire home / apartment' to let rather than a room in a shared house, 8,748 (39.7%) were in South East Scotland and 1,005 (4.09%) in Fife.

A9.22. The research considered case studies including North East Fife. A key impact identified for North East Fife was the reduced availability of residential housing with the negative impact on affordability, sustaining communities and the negative impact on the wider local economy and local public services. The rise in STLs was associated with the fall in resident population and school rolls, with

fears about the long-term sustainability of the community. In summary the findings for North East Fife show:

- Amount and use – There has been some increases of STLs to the supply of existing holiday homes, but the platforms have provided a new route to market to increase occupancy of existing holiday homes, and have extended the areas of STLs out to areas not traditionally known for holiday homes. The attraction of entire property STLs was convenience for groups and families, which has been the predominant demand for visitor accommodation in this area. There has been an increase in tourism for coastal and golf holidays, including from some international visitors. There has been a shift in the self-catering market from traditional one-week to shorter stays which has helped to stretch the tourism season and has increased occupancy in the quieter times.
- Positive impacts – Positive impacts were seen as tourism and impact on the local economy, and jobs. There has been an extension of the tourism season with benefits for tourism-based industries and the STLs supply chain - cleaners and property trades. There has been an increased offer and vibrancy from local shops. Participants also identified income for professional hosts and holiday home owners, but there was little evidence of home sharing income benefits for individual households due to the small proportion of home sharing in this area, other than increased income for holiday home owners.
- Negative impacts – The negative impacts were mainly seen as exacerbating the existing impact of lack of residential homes and impact on housing affordability. Increased congestion was also identified and associated impacts for local residents associated with traffic. There were some concerns about impacts on sustainability of communities, especially where STLs have moved into new areas, with community action to maintain local amenities, shops and public services and concerns for the falling school roll.

A9.23. Further to this research, following the introduction of the licensing scheme for short-term lets, more accurate data has now become available. Fife Council have received 1,836 applications. [Short-term Lets Licence | Fife Council](#)

Table 14: Application breakdown by STL type

STL Type	Total	%
Secondary Letting (the letting of property where you do not normally live, for example, a second home that is let to guests)	1534	83.55%
Home Share (using all or part of your own home for short-term lets, whilst you are there)	139	7.57%
Home Letting (using all or part of your own home for short-term lets, whilst you are absent. An example of this could be whilst you are on holiday)	86	4.68%
Home Share and Letting (operating short-term lets from your own home while you are living there and for periods when you are absent)	77	4.19%

Source: Fife Council Housing Services STL Register, October 2023

Table 15: Short Term Let Applications by LHS Area

LHS Area	STLs	All Tenure	%
Cowdenbeath	16	17,249	0.09
Cupar & Howe	98	10,654	0.92
Dunfermline	215	43,955	0.49
Glenrothes	31	22,856	0.14
Kirkcaldy	108	35,385	0.31
Largo & East Neuk	675	8,942	7.55
Levenmouth	19	17,483	0.11
St Andrews	594	12,287	4.83
Taycoast	47	6,429	0.73
West Villages	33	8,147	0.41
Grand Total	1,836	183,387	1.00

Source: Fife Council Housing Services STL Register, October 2023

Table 16: Breakdown of STL Application Types by LHS Area

LHS Area	STL Type				Total
	Secondary Letting	Home Share	Home Letting	Home share & Letting	
Cowdenbeath	12	2	1	1	16
Cupar & Howe	76	12	7	3	98
Dunfermline	172	22	9	12	215
Glenrothes	20	8		3	31
Kirkcaldy	82	9	10	7	108
Largo & East Neuk	607	24	20	24	675
Levenmouth	8	7	3	1	19
St Andrews	495	45	32	22	594
Taycoast	37	6	2	2	47
West Villages	25	4	2	2	33
Grand Total	1534	139	86	77	1836

Source: Fife Council Housing Services STL Register, October 2023

- A9.24. Some communities in Fife are becoming increasingly concerned that the increase in short-term lets over recent years is impacting on the availability and affordability of housing locally, and is having a secondary impact on jobs, services and business opportunity. However, short-term lets are also an important part of the visitor economy, encouraging spend locally.
- A9.25. There are two property types contributing to short-term lets; short-term lets run solely as a business (available for let for at least 140 days per annum and must achieve at least 70 days of lettings) and casual short-term let (for less than 70 nights per annum) that normally operate as private second homes.
- A9.26. It should be noted that not all properties are purely used as STLs some have other additional uses (see table 14 below). It is important to be aware of this to avoid double counting in our data.

Table 17: STLs with Additional Uses

LHS Area	All STL Applications	Non-Domestic Rates	HMO	Second Home
Cowdenbeath	16	3		
Cupar & Howe	98	29		3
Dunfermline	215	61		1
Glenrothes	31	6		
Kirkcaldy	108	37		4
Largo & East Neuk	675	234		80
Levenmouth	19	3		
St Andrews	594	111	52	22
Taycoast	47	7		
West Villages	33	9		
Grand Total	1,836	500	52	110

Source: Fife Council Housing Services STL & HMO Register, October 2023

- A9.27. The spatial distribution and clustering of STLs is mapped [here](#). Interactive mapping is also available [here](#).
- A9.28. Clusters of STLs exist within the LHS areas of Largo & East Neuk and St Andrews; breaking the data down to individual settlements within these LHS areas the numbers are:

Largo & East Neuk LHS Area

Table 18: Breakdown of Applications in Largo & East Neuk LHS Area

Settlement	STL Type				Total
	Secondary Letting	Home Share	Home Letting	Home share & Letting	
Abercrombie				1	1
Anstruther	71	5	3	2	81
Arncroach	2			1	3
By Crail	1				1
Carnbee	1			1	2
Cellardyke	77		5		82
Charleton	2				2
Colinsburgh	9		1	1	11
Crail	92	2	2	3	99
Drumeldie		1			1
Earlsferry	29	2	1		32
Elie	109			2	111
Firth of Forth	1				1
Kilconquhar	4				4
Kilrenny	11		1		12
Kingsbarns	18	2	1		21
Largoward	2	1		1	4
Leven	5			1	6
Lower Largo	39	3		1	43
Lundin Links	8	1		1	10
Newburn	1				1
Pittenweem	62	1	4	3	70
St Monans	53	3	3	1	60
Upper Largo	5	2		2	9
Wormiston	1			2	3
TOTAL	607	24	20	24	675

Source: Fife Council Housing Services STL Register, October 2023

St Andrews LHS Area

Table 191: Breakdown of Applications in St Andrews LHS Area

Settlement	STL Type				Total
	Secondary Letting	Home Share	Home Letting	Home share & Letting	
Ballymonth	1				1
Balmullo	2	1		1	4
Blebocraigs	1				1
Boarshills	6			1	7
Cameron	2				2
Cellardyke			1		1
Ceres	8	2	1	1	12
Chance Inn	1			1	2
Cupar	5	2		1	8
Dairsie	4		1	1	6
Dunino	2	3			5
Dura Den					
Guardbridge	3		1		4
Kemback		1			1
Kincaple	5				5
Kingask	5				5
Leuchars	4				4
Lucklaw		1			1
Peat Inn	5		1		6
Priorletham	1				1
St Andrews	430	34	27	14	505
St Michaels	3				3
Strathkinnes	3	1		2	6
Strathtyrum	2				2
Tayport	2				2
TOTAL	495	45	32	22	594

Source: Fife Council Housing Services STL Register, October 2023

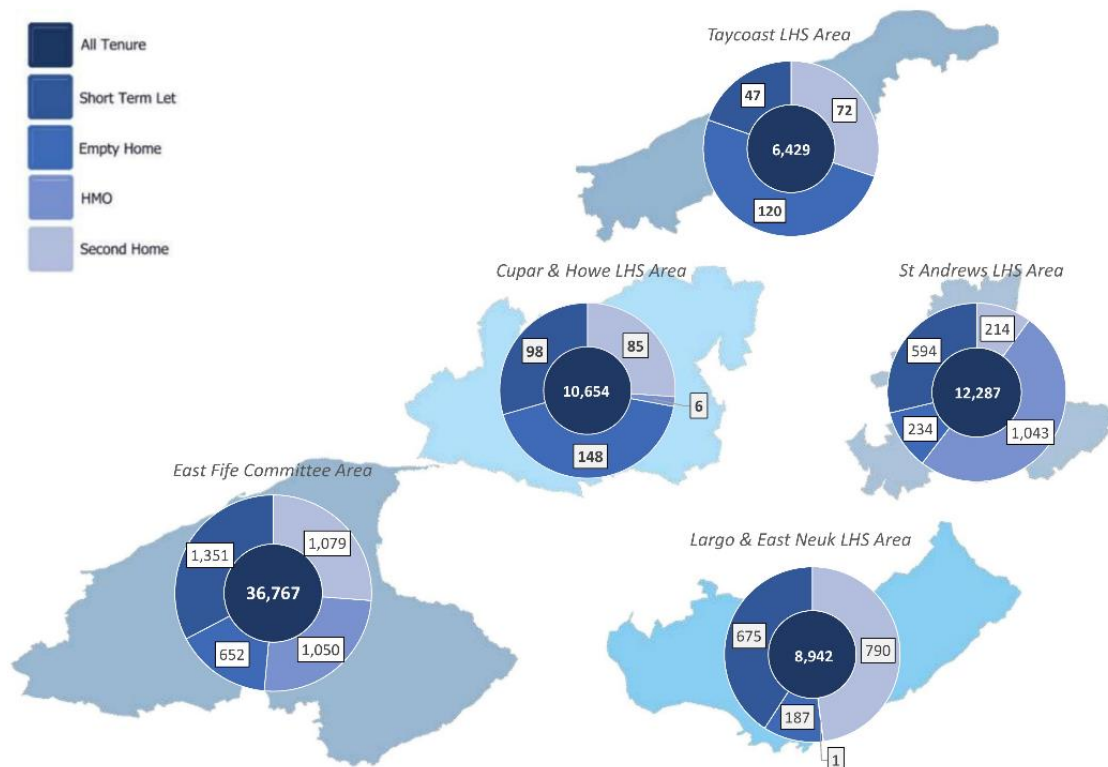
Rural Living

- A9.29. The rural areas in Fife are predominantly classified as accessible rural by the Scottish Government Urban Rural Classification 2022 and are relatively close to the main towns in the area. Population estimates show that the more rural areas of North East Fife and South & West Fife will see a slight increase and decrease in population, respectively. There are no rural areas in Fife which either have experienced or are projected to experience a substantial decline in population.
- A9.30. NPF4 offers support for rural housing in the context of supporting sustainable rural homes in the right location through Policy 17. The provision of rural housing is a necessary and integral part of growing a successful and sustainable rural economy. Rural living offers many benefits but also brings additional challenges to rural communities, especially in terms of access to quality, affordable housing and access to services. Evidence illustrates that access to housing is impacting on rural economic growth and job creation within Fife. Some rural businesses are reporting that they cannot fill existing vacancies and/or are struggling to grow their business further as potential employees cannot access housing locally. This is frequently due to a lack of available rural housing and often specifically affordable housing. Whilst affordable housing opportunities may exist further afield, these can often be impractical for employees especially in traditionally lower paid sectors such as tourism and agriculture. This is due to the limited availability and frequency of rural public transport and the cost of private transport. This is particularly evident in North East Fife.
- A9.31. Fife Council is aware that a number of the North East Fife Estates are currently considering the future of their respective estates. This is considered in the summary of evidence for North East Fife below.

Summary of Evidence – North East Fife

A9.32. Figure 1 provided an overview of all tenures per area committee. It highlighted the number of short term lets, empty homes, houses in multiple occupation and second homes per committee area and identified a high concentration within North-East Fife. Figure 2 below breaks the North-East Fife Committee Area into the smaller Local Housing Strategy Areas to identify the differences and challenges faced by the different geographies within the committee area.

Figure 2: North-East Fife Tenure Overview



Source: Fife Council data (Assessors & Housing Services)

Note: The LHS Areas and North-East Fife Committee Area geographies do not follow the same boundaries. Therefore, the sum of the LHS Area data will not equal the Area Committee figure.

Houses in Multiple Occupation (HMOs)

A9.33. HMOs are a key element of the private rented sector, which itself plays a significant role in meeting housing needs. The demand for HMO accommodation is particularly high in St. Andrews compared to most other parts of Fife. There are currently 1,160 premises listed as HMOs in Fife, the majority being located within St Andrews (1,043 premises, 90% of all HMOs).

A9.34. A moratorium was introduced under planning policy to achieve a balance between the competing demands for accommodation and the need for a balanced community. However, research suggests that the increase in the

number of HMOs in St Andrews indicated that it was not having the desired impact and a new approach under Housing policy, an over provision policy, was agreed and implemented in April 2019 [Overprovision.pdf \(fife.gov.uk\)](#)

A9.35. The spatial distribution and clustering of HMOs is mapped [here](#). Interactive mapping is also available [here](#).

Second Homes

A9.36. In total, 1,762 homes within Fife are listed as second homes, which represents around 0.96% of the total housing stock. The largest concentration of second homes is in the Largo & East Neuk LHS area where there are 790 second homes (8.8% of all homes in the LHS area).

A9.37. As identified within the Fife-wide section, funding received from second homes council tax has been committed to affordable housing projects to further enhance Scottish Government funding programmes.

A9.38. The spatial distribution and clustering of second homes is mapped [here](#). Interactive mapping is also available [here](#).

Short Term Lets (STLs)

A9.39. Since the implementation of the STL Licensing Scheme, Fife Council have received a total of 1,836 applications (Oct 2023). The table below shows the number of applications received for the LHS areas which lie within North East Fife and those STL applications that are secondary lets only. The Town & Country Planning (Short-Term Let Control Areas) (Scotland) Regulations 2021 enable Planning Authorities to designate control areas, the purpose of which is to help manage high concentrations of secondary letting.

Table20: Number STL Applications in North East Fife

LHS Area	All Tenure	All STLs		Secondary Lets Only	
Cupar & Howe	10,654	98	0.92%	76	0.71%
Largo & East Neuk	8,942	675	7.55%	607	6.79%
St Andrews	12,287	594	4.83%	495	4.03%
Taycoast	6,429	47	0.73%	37	0.58%
Grand Total	38,312	1,414	3.69%	1,215	3.17%

Source: Fife Council Housing Services STL Register

A9.40. A breakdown by STL type shows:

Table 212: Breakdown of Application Type in North East Fife

STL Type	Cupar & Howe	Largo & East Neuk	St Andrews	Taycoast
Secondary Letting (the letting of property where you do not normally live, for example, a second home that is let to guests)	76 (77.55%)	607 (89.93%)	495 (83.33%)	37 (78.72%)
Home Share (using all or part of your own home for short-term lets, whilst you are there)	12 (12.24%)	24 (3.56%)	45 (7.58%)	6 (12.77%)
Home Letting (using all or part of your own home for short-term lets, whilst you are absent. An example of this could be whilst you are on holiday)	7 (7.14%)	20 (2.96%)	32 (5.39%)	2 (4.26%)
Home Share and Letting (operating short-term lets from your own home while you are living there and for periods when you are absent)	3 (3.06%)	24 (3.56%)	22 (3.70%)	2 (4.26%)
TOTAL	98	675	594	47

Source: Fife Council Housing Services STL Register

- A9.41. The spatial distribution and clustering of STLs is mapped [here](#). Interactive mapping is also available [here](#).
- A9.42. Communities in North East Fife are becoming increasingly concerned that the increase in short-term lets over recent years is impacting on the availability and affordability of housing locally, and is having a secondary impact on jobs, services, and business opportunity. However, short-term lets are also an important part of the visitor economy, encouraging spend locally.
- A9.43. In determining the need for a short term let control area (STLCA) it is essential that any policy balances the positive contribution of short-term lets to the tourism sector and local economies, against the potential adverse impacts on the character and amenity of areas and the impact of further reducing the supply of permanent housing. There is a balance to be struck between those who rely on an income from their short-term let, and those who are concerned that more residential properties should be retained as permanent homes for local people.
- A9.44. A short-term let control area cannot control second homes which are equally prevalent in some areas such as North East Fife, and which often make much less of a contribution to the local economy than short-term lets occupied by visitors to the area. The introduction of a control area will also have no effect on the numbers of purpose-built self-catering units which are being operated as short-term lets, given that these will already have planning permission.

Housing for Further and Higher Education

- A9.45. St. Andrews University provides around 4,181 purpose-built student bedspaces in St Andrews for 10,360 students. Through partnership arrangements, circa 550 additional beds are also provided in Leuchars, Dundee, and St Andrews. The University has identified a need for around 1,000 additional bedspaces to be provided by the University in St Andrews.
- A9.46. The University recognises the impact of this growth on the operation of the St Andrews housing market and the acute housing needs of low-income households not just in St Andrews but other areas of Fife. A Student Accommodation Masterplan is under development with a budget of around £140 million to improve and develop student accommodation in the town taking total residential capacity to around 5,000.

Rural Living

- A9.47. Fife Council is aware that a number of the North East Fife Estates are currently considering the future of their respective estates. As a key part of this process, they have the vision of creating sustainable rural communities and delivering rural economic growth and job creation. Whilst this work is currently ongoing, Balcaskie and Cambo Estates have shared early work to help inform the evidence report. [This work](#) illustrates that housing is regarded as key infrastructure by both Estates. The Estates *“see it as essential that the next LDP recognises this local need to support rural communities. As rural facilities and services across rural areas continue to be lost or depleted, particularly in areas where second homes and holiday lets dominate, new homes to support local jobs*

and those employees (and their families) are essential to sustaining rural community life.”

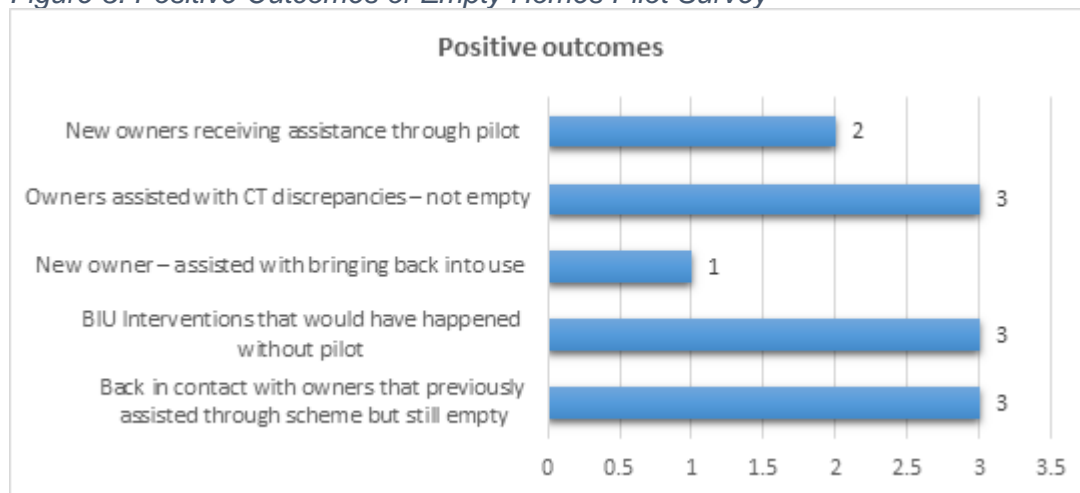
Summary of Stakeholder Engagement

A9.48. A range of stakeholders were consulted throughout the development of the LHS 2022-2027 ([Local Housing Strategy Consultation Report](#)); areas most relevant to this paper include:

Empty Homes Survey

A9.49. A pilot survey was sent to empty homeowners in the Leslie area to find out why their property was empty, what the owner wanted/planned to do with the property, what the realistic options were for bringing it back to use and if Fife Council could help. The exercise facilitated contact with owners and as of October 2021, 11 out of the 24 empty properties have been brought back into use. Some positive outcomes are shown below:

Figure 3: Positive Outcomes of Empty Homes Pilot Survey



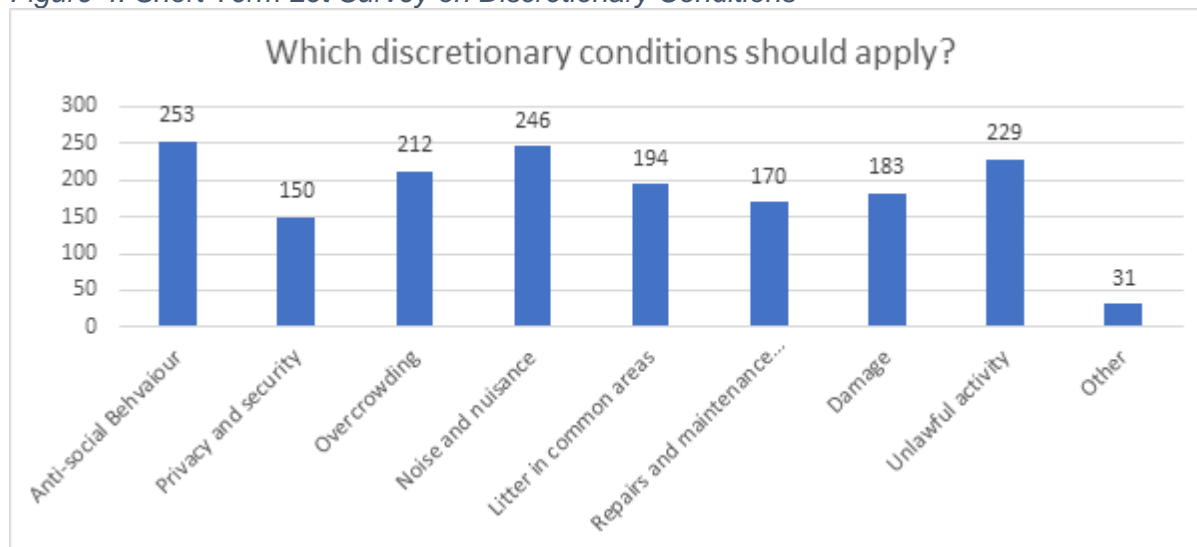
Source: *Local Housing Strategy 2022-2027 Consultation Report*

A9.50. The survey has helped shape the strategy under LHS Outcome - People live in good quality housing and will guide and inform the Proposed Plan strategy.

Short Term Lets Survey & Workshop

A9.51. An online survey was conducted during 2022 to help develop the Short-term Let Licencing Scheme in Fife. Almost 400 responses were received from the survey, mainly from individuals and Short-term Let hosts. Survey findings included:

Figure 4: Short Term Let Survey on Discretionary Conditions



Source: Local Housing Strategy 2022-2027 Consultation Report

- The majority of people voted for Short Term Licences to be granted for 3 years.
- 70% of people believed discretionary conditions should apply.
- 42% voted to introduce temporary exemption.
- The majority voted for additional conditions to be introduced with a temporary exemption.
- Feedback included some positives and negatives for Short-Term Letting.

A9.52. Around 30 elected members attended the short term lets workshop in June 2022 to gain a background to the legislation, briefing on the outcomes of the recent short term let survey and to enable the consideration and discussion of the discretionary elements of the scheme. All elected members were supportive of introducing a licensing regime however acknowledged that the Council's approach requires to be balanced and proportionate.

Figure 5: Consultation Feedback on Short-term Lets Scheme

COMMENTS ON THE SCHEME

'Balance is important, people should be able to grow short-term lets locally but there also needs to be a contribution back to the communities'

'Rent a room or home lets are being used by many young professionals when moving to an area, we don't want to restrict this market'

'I agree with having some sort of scheme, but it shouldn't be too arduous for hosts'

COMMENTS ON CONDITIONS AND EXEMPTIONS

'Initially, we should inspect 100% of short term lets, then apply some proportionality – what's the point otherwise?'

'Inspections are important where there have been consistent problems e.g. fly tipping or noise complaints. We shouldn't need to inspect every property'

'Temporary exemptions will provide flexibility when events are taking place and give people the opportunity to move around Fife itself too'

Source: Local Housing Strategy 2022-2027 Consultation Report

- A9.53. Information from the Short Term Lets workshop and survey has supported the strategy for the LHS Outcome - People live in well managed rented housing and will guide and inform the Proposed Plan strategy.

Meeting with the Association of Scotland's Self-Caterers

- A9.54. In September 2023, Planning Services and Housing Services held an informal conversation with the Association of Scotland's Self-Caterers (ASSC) to help us understand what issues they felt (as an industry) Short Term Lets Control Areas (STLCAs) require to address. As part of this meeting, potential data sources that the ASSC was aware of were discussed that would help evidence whether or not there is a need for STLCAs in areas of Fife. These data sources have informed the evidence report and further analysis out with the evidence report is progressing to determine any need for STLCAs in Fife.

Summary of Implications for the Proposed Plan

- A9.55. The data and evidence outlined above highlights a number of challenges that the Proposed Plan requires to consider through the spatial strategy, site allocations and local policy:

HMOs

- A9.56. Fife Council will review the impact of the HMO moratorium and update LDP policy to reflect the over-provision policy. This will take account of the £140m investment proposed by St Andrews University, for student accommodation.

Short Term Lets & Second Homes

- A9.57. The application of a control area policy framework will need to balance the positive contribution of STLs to the tourism sector and local economies, against the potential adverse impacts on the character and amenity of areas and the impact of further reducing the supply of permanent housing.
- A9.58. Research has been undertaken into the various data the Council currently holds to ascertain the impacts that tourist accommodation is having on the available housing stock. The findings along with potential impacts and issues (including tourism and local economic impacts) will be explored further and will inform the potential need and location of any short term let control areas and/or localised policy.
- A9.59. It is acknowledged there is a relatively high percentage of STLs in Elie & Earlsferry. To help address this and deliver housing to meet local needs, there requires to be a focus on the range of housing outcomes that will be set out within the emerging Housing Emergency Action Plan. In addition, the existing Local Housing Strategy 2022-2027 linked with the development plan process will assess housing requirements. This will ensure a generous supply of land for local and affordable housing in areas where the need is greatest.

Rural Homes

- A9.60. There are some differences in approach between NPF4's Policy 17 on Rural Homes, and LDP1's policy on housing development in the countryside. LDP2 will have to consider this and determine whether clarification in the form of a locally tailored policy is justified. The Council recognises that updated information, such as more localised population and household projections, will emerge in the course of preparation of the Proposed Plan, this will be given consideration in finalising the LHLR.

Housing for Further and Higher Education

A9.61. Student accommodation for Further and Higher Education requires to be considered in the context of the constrained housing market in St Andrews and the pressures from local housing need, student accommodation and tourism. This is especially the case in terms of HMO properties, resulting in available accommodation being at a premium in St Andrews. The LDP requires to address all housing needs for St Andrews and strike a balance between these competing needs. As the Proposed Plan is prepared, further work will be undertaken to determine the most appropriate approach to balancing these issues and needs and the role of development plan policy and specific allocations. It is noted that the University of St Andrews suggest a bespoke policy position for student accommodation in St Andrews is required and that given the lifespan of the LDP, flexibility requires to be built in to respond to changing needs. These issues will be considered in the preparation of the Proposed Plan.

Statements of Agreement/Dispute

- A9.62. Fife Council Housing Services have been consulted on this annex and agree with its content.
- A9.63. Homes for Scotland received both housing annexes for comment. Whilst comments were received, no comments were received concerning this annex. Comments focussed on the indicative Local Housing Land Requirement and are discussed within that annex and specific section of the Evidence Report.