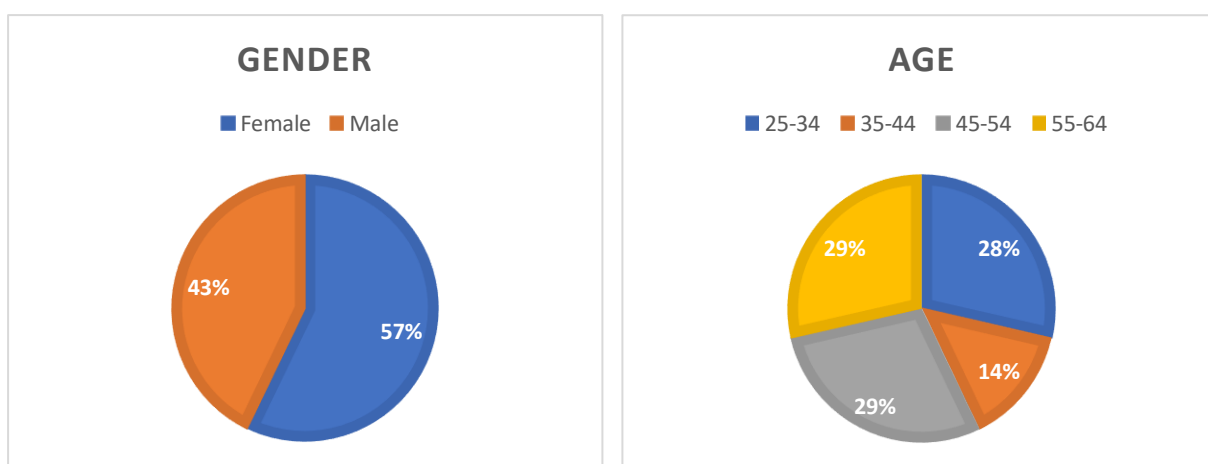


## Local Housing Strategy 2022-27 Public Consultation - November 22

The LHS public consultation was available online from 13<sup>th</sup> September to 8<sup>th</sup> November 2022. The consultation was available through Fife.gov.uk, the Fife Council consultation diary and was promoted through social media and various partnership groups. Eleven responses were provided. Some of the feedback received is outlined throughout this report with full comments and the LHS response to each outlined within Appendix 1 (page 5).

### Respondents

Both Homes for Scotland and NHS Fife provided responses to the survey as well as homeowners and social housing tenants. A breakdown of some of the respondent characteristics are as follows.



### Do you have any comments on the full Local Housing Strategy 2022-2027?

- 
- *'I would like to see less consumption of green belt land for homes and more use of brownfield sites. Some are large enough to create a village or town which would probably provide a high percentage of the new homes needed.'*
  - *'We welcome the positive strategy, the identified priorities and the good emphasis on inclusion.'*
  - *'There is currently a housing crisis in Scotland. The LHS risks worsening this crisis, by planning for the delivery of far too few new homes, across all tenures.'*
  - *'Expect more emphasis on a human rights based approach. Under legislation/policy p13- first box- should refer to the Independent Care Review and The Promise Scotland for Care Experienced Children and Young People.'*
-

## Do you have any comments on Priority 1 - Ending Homelessness?

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- *'Could MSP's be lobbied to change legislation to allow FC to encourage compulsory downsizes when a person has a property which is too large for them. The legislation appears to cover over crowding but not under accommodating.'*
  - *'We think a particular emphasis on housing refugees should be considered as this is a complex area and it may be likely that we will continue to see demand in this area. We would also highlight the issue of temporary emergency accommodation for example in the event of crisis evacuation for fire, flood, power outage etc. This is again in response to current issues in emergency preparedness.'*
- 

## Do you have any comments on Priority 2 - More Homes in the Right Places?

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- *'Whilst I support the draft plan for Priority 2, I believe there is an element missing. There should be consideration under this area about overall location of homes and the impact on both communities and prospective tenants of developments.'*
  - *'In respect of brownfield development, we recognise its importance but there needs to be a hybrid/balanced approach to land allocation that also provides a release of greenfield land. This is due to the inherent constraints on deliverability/timeline associated with brownfield development.'*
- 

## Do you have any comments on Priority 3 - A Suitable Home?

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- *'We need more 2-bedroom bungalows and 4 bed + properties to be built.'*
  - *'We would like to identify the issue of housing for vulnerable young people eg care leavers. We would like to see increased emphasis on ensuring suitable housing for such high-risk individuals where risks to their health and well-being are minimised and they are offered a high level of support. We also note the reference to the Health and Social Care Strategic Plan and increasing the role of housing officers in preventive approaches. We would welcome collaboration in this are for example joint training.'*
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## Do you have any comments on Priority 4 - A Quality Home?

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- *'Homes with poor insulation or inefficient heating can result in fuel poverty, causing stress for lower income families who may be unable to afford both fuel and food. On average, 89% of all new homes built by Homes for Scotland members met at least an EPC grade 'B' standard. In terms of carbon reduction, surveys show that, increasingly, home builders are embedding zero emissions heating systems and enhanced energy-efficiency measures into their developments.'*
  - *'The Climate Change Act 2019 commits Scotland to net-zero emissions of all greenhouse gases by 2045. New homes are measured against building standards which outline a number of criteria which all developments must meet in order to gain a building warrant. With respect to environmental sustainability, home builders must comply with reducing carbon emissions through minimising both the waste of energy and the use of carbon-based energy systems.'*
- 

## Do you have any comments on Priority 5 - A Warm Low Carbon Home?

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- *'We believe the discussion of Heat Networks should include language which indicates that any connection is viable and practically deliverable. New home building is very well placed to meet the net-zero ambition with new homes built today emitting 75% less carbon than those built in 1990 and the new building regulations are set to reduce carbon emissions by a further 32%.'*
- 

## Do you have any comments on Appendix 1: LHS Outcome Plan 2022-2027?

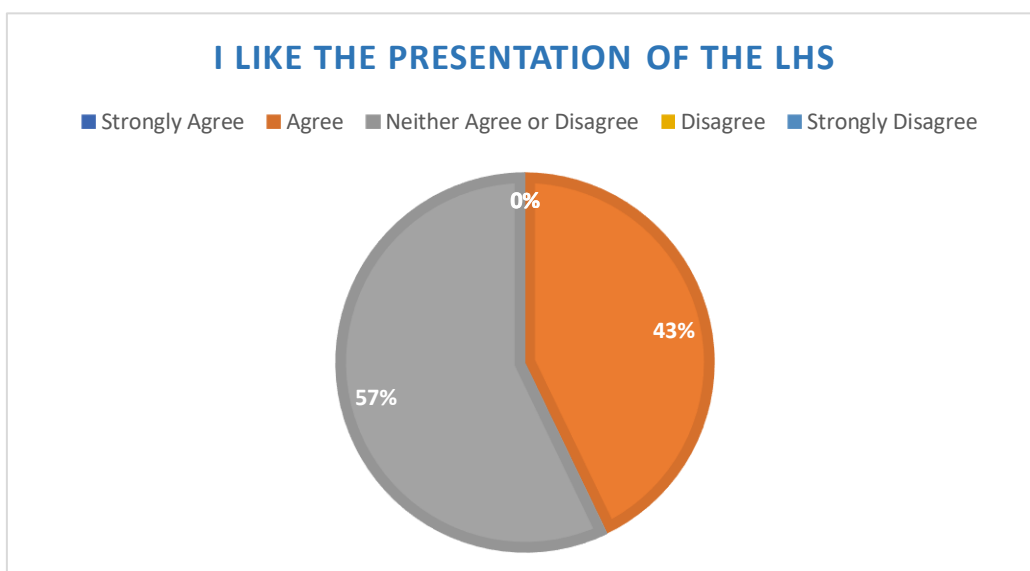
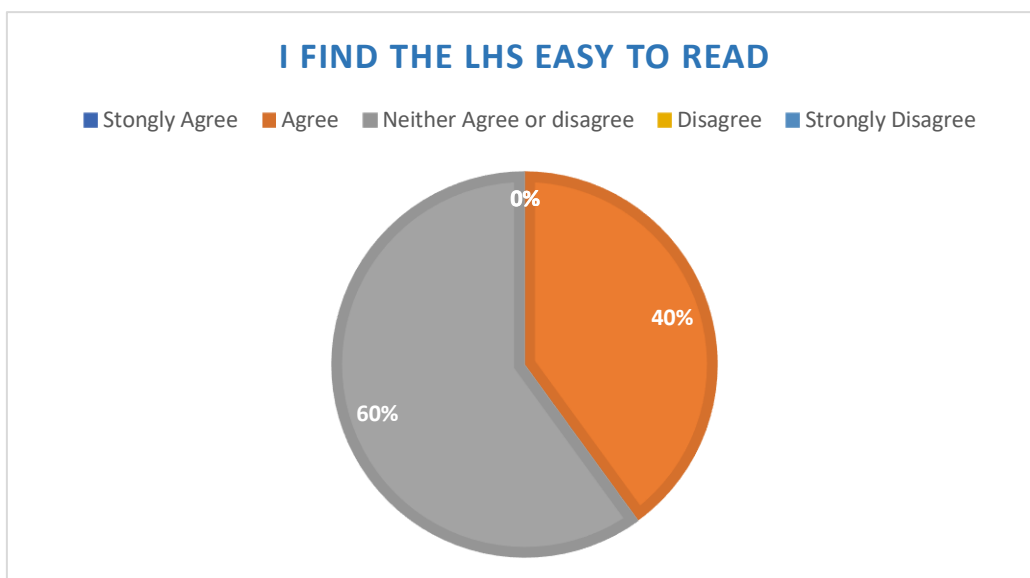
No Comments

## Do you feel there are any priorities or actions missing from the LHS 2022-2027?

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- *'Housing strategies should refer to all tenures, yet the scope of the LHS appears to be too narrow, with its focus predominantly on affordable housing.'*
  - *'There should be actions around ensuring housing delivery partners engage with communities to ensure proper change management'*
-

## Do you agree or disagree with the following statements?



## Summary and Key Findings

- The LHS is fairly easy to read, and the presentation is agreeable.
- More use of brownfield sites for new developments.
- The overall supply of new homes projected to be delivered through the LHS is too low.
- More emphasis on a human rights approach with further focus on children, care leavers and pregnancy and maternity.
- It is important zero emissions heating systems and enhanced energy-efficiency measures are incorporated into developments to achieve net-zero by 2045.
- More community engagement when developing new sites to ensure tenants have the opportunity to integrate with communities.

## Appendix 1 – all comments and responses

LHS Link	Public Consultation Comments	Responses
<b>Do you have any comments on the full Local Housing Strategy 2022-2027?</b>		
<b>Priority 2</b>	I would like to see less consumption of green belt land for homes and more use of brownfield sites. Some are large enough to create a village or town which would probably provide a high percentage of the new homes needed!	We will ensure the delivery of high quality and affordable housing in the right locations. Significant growth should be mixed use and where possible targeted on brownfield sites which support wider regeneration efforts. Fife Council have agreed a town centre housing approach to meet housing need and demand, identifying sites for new homes in town centres across Fife to facilitate regeneration. The approach is led by the Council’s Town Centre Development Unit supported by housing partners.
<b>Priority 3</b>	We welcome the positive strategy, the identified priorities, and the good emphasis on inclusion. We have a number of comments overall in relation to housing for pregnant women and vulnerable young families.	Comment noted
<b>Priority 3</b>	Welcome focus on child poverty on p10 but would benefit from spelling out the six child poverty priority groups, as these overlap with parts of strategy, and 91% of those in child poverty fall into these groups - lone parents, families affected by disability, ethnicity, mother <25 y, child <1yr, > 3 children. Data to show impact for these groups is required for reporting back on actions relating to reducing child poverty, via the Tackling Poverty Preventing Crisis Board.	The LHS outlines the strategic links with the Tackling Child Poverty Delivery Plan 2022-2026 and contains actions linking to ending homelessness, addressing fuel poverty and providing affordable homes which will all contribute to reducing child poverty. It is not a requirement of the LHS to refer to the different child poverty groups and data is not available at this level for reporting purposes.
<b>Priority 3</b>	Expect more emphasis on a human rights based approach. Under legislation/policy p13- first box- should refer to the Independent Care Review and The Promise Scotland for Care Experienced Children and Young People: <a href="https://thepromise.scot/">https://thepromise.scot/</a> and Children’s Rights: <a href="https://www.gov.scot/policies/human-rights/childrens-rights/">https://www.gov.scot/policies/human-rights/childrens-rights/</a> with impacts to uphold the rights of care experienced young	The LHS has been amended to reflect the ‘Independent Care Review: The Promise’ on page 13 under the LHS priority ‘A Suitable Home’. The LHS impact of this will be to ‘enhance services for care experienced young people’. The Human Rights Act 1998 is referenced on page 17 and has also been considered

LHS Link	Public Consultation Comments	Responses
	people and listen to and respect and involve children young people and families.	during the development of the Equality Impact Assessment which included the consideration of children and young people’s rights.
<b>Priority 3 Consultation</b>	P15- was there consultation with bodies representing children and families, and other partnerships e.g. Children in Fife?	During the development of the LHS, a range of organisations representing children were included in the consultation process. These included voluntary organisations, Fife Centre for Equalities, Fife Woman’s Aid and homeless charities. Further details can be found in Appendix 2 – LHS Consultation Report.
<b>Priority 1 Priority 3</b>	P17- pregnancy and maternity- no strategic issues identified- see below- access to housing very important for health care and health of pregnant women, new mother and their infants.	This group have been considered as part of the Equality Impact Assessment and the LHS does not consider any actual or potential inequalities for the pregnancy and maternity characteristic. The RRTP aims to develop Personal Housing Planning Approaches for those most ‘at risk’ of becoming homeless in partnership with Health and Social Care, Education, Criminal Justice and other key services to prevent statutory homelessness presentations. Although not specifically mentioned, this covers the pregnancy and maternity group to help create access to housing and prevent homelessness.
<b>Priority 3 Consultation</b>	P55 care leavers- has there been engagement with this group of young people via The Promise group?	No engagement took place via The Promise Group however care leavers were represented through Voluntary Organisations (such as Frontline Fife) as well as Fife Centre for Equalities during the LHS development. Further details can be found in Appendix 2 – LHS Consultation Report.
<b>Priority 3</b>	P57- the number of adults on the autism spectrum looks like an underestimate	Figure is from the Learning Disabilities Statistics Scotland 2019 Report, sourced from the Scottish Commission for People with learning difficulties webpage. These are the latest stats available. The LHS text has been amended to make it clear that the figure included is for adults with an autism spectrum diagnosis.
<b>Priority 1 Priority 3 EQIA</b>	Appendix 3 EQIA p3 pregnancy and maternity- box for no impact is ticked. These are critical life stages with attendant increased physical health risks and mental health risks for the mother; for access to health care and development of bonding with the infant,	With regards to the EQIA, the strategy does not consider any actual or potential inequalities for the pregnancy and maternity characteristic. Admittedly, there is neither actual nor potential positive impacts. The RRTP does highlight the requirement,

LHS Link	Public Consultation Comments	Responses
	<p>which has lifelong impacts. For those with complex social issues in pregnancy there is a substantially higher risk of maternal death. Continuity of health care staff and family or other support is crucial for positive outcomes. There may be particular requirements for equipment storage eg prams and cots, and accessing safe places in the neighbourhood to get healthcare and meet other new mums. This is a stigmatised group and there should be focus on them and positive impact from the strategy. Feedback from maternity staff indicates significant challenges in communication with housing staff and examples of difficulty or delay in getting appropriate housing. It would be useful to arrange a meeting between maternity and housing officers to understand how to improve communication. Children’s rights and the UNCRC need to be fully considered, as well as The Promise. For characteristic sex- 91% of lone parents are women so aspects relating to lone parent families also affect women (but not exclusively, as with domestic abuse).</p>	<p>although not specifically mentioned as pregnancy and maternity, the following:</p> <ul style="list-style-type: none"> <li>• Developing Personal Housing Planning Approaches for those most ‘at risk’ of becoming homeless in partnership with Health and Social Care, Education, Criminal Justice and other key services to prevent statutory homelessness presentations</li> <li>• Establishing early warning trigger systems through Health and Social Care Partnership activity building on developing Projects and other managed housing pathway</li> <li>• The support needs of those with particular health conditions and social circumstances are likely to be diverse and variable therefore the link between housing, health and social care services needs to be person centered, effectively integrated and flexible in response to individual need and circumstance. Communication between housing and maternity staff is an operational issue which has been referred to the Housing Areas teams to pursue to improve services.</li> </ul>
<b>Housing Supply Priority 2</b>	<p>There is currently a housing crisis in Scotland. The LHS risks worsening this crisis, by planning for the delivery of far too few new homes, across all tenures.</p>	<p>This links to the Minimum All Tenure Housing Land Requirement (MATHLR) response below (starting on page 8).</p>
<b>LHS 2022-2027</b>	<p>The LHS Priorities 2022-2027 are: 1. Ending Homelessness. 2. More Homes in the Right Places. 3. A Suitable Home. 4. A Quality Home. 5. A Warm Low Carbon Home. It is unclear whether these Priorities are ranked 1-5 in order of importance, or whether they are to be equally addressed. Specific comments in respect of these Priorities are set out in the relevant sections below.</p> <p>The LHS Outcomes 2022-2027 are: 1.1 People are prevented from becoming homeless. 1.2 People are enabled to sustain their current accommodation. 1.3 People are provided with suitable and sustainable housing options. 2.1 People are provided with housing appropriate to their need and demand. 3.1 People are offered</p>	<p>There has been no ranking used to determine the importance of the priorities during the development of the LHS.</p>

LHS Link	Public Consultation Comments	Responses
	<p>appropriate housing options and support services to sustain their choice of living arrangements. 3.2 People are provided with housing adaptations to enable independent living. 4.1 People live in good quality housing. 4.2 People live in well-managed rented housing. 5.1 People do not live in fuel poverty. 5.2 People live in energy efficient homes and reduce carbon emissions. Specific comments in respect of these Outcomes are set out in the relevant sections below.</p>	
<b>Housing Supply Priority 2</b>	<p>In terms of the broader issues, the first strategic priority of the LHS is to increase the supply and delivery of homes across all tenures. However, the number of homes sought per annum is counterintuitive to this aim as it is less than has been delivered over the past ten years.</p>	<p>The Housing Estimates are based on the HNDA steady growth scenario for Fife which was agreed between Housing &amp; Planning through discussion with regional partners. This scenario is based on the assumption of steady growth in income, house prices and rents. Figures have reduced due to a change in the methodology for calculating existing need. This saw a large reduction in the measurement of overcrowded and concealed households through the Scottish Government issuing guidance to only count households which are both concealed and overcrowded. Existing need is based on Local Authorities own methodology rather than the HNDA Tool default which has produced higher results than the default position.</p>
<b>Housing Supply</b>	<p>The LHS states that “The target for housing supply in Fife ranges from 6,730-7,350 homes” (p. 31). There is a failure to comprehend that the MATHLR is a minimum figure, and that the supply target should not be set beneath this. Even the full MATHLR figure, however, is unacceptably low.</p> <p>There needs to be an adequate supply of land that is deliverable/unconstrained. This will ensure development in the right places and the deliverability of homes. The MATHLR is just 7,350 units over ten years. This figure is well below all-tenure completions over the past ten years, which was just less than 12,000 units for the ten-year period 2012-2021, a timeframe during which levels of home building were affected by both the years immediately</p>	<p>The Minimum All Tenure Housing Land Requirement (MATHLR) has been set by the Scottish Government through National Planning Framework 4 (NPF4), these figures have been revised since Draft NPF4 was published to take account of new Housing Need and Demand Assessments (HNDA). This has resulted in a revised All Fife MATHLR figure of 7,300.</p> <p>The Tayside HNDA3 was appraised by the Centre for Housing Market Analysis (CHMA) in August 2022. This included an updated existing need figure for Fife (North) of 700. The CHMA confirmed that the HNDA has the potential to be robust and credible, subject to completion of 15 recommendations. There were no clarifications sought in respect of the existing need figures.</p>



LHS Link	Public Consultation Comments	Responses
	<p>following the global financial crisis, and the difficulties surrounding the restrictions enforced due to the covid pandemic. To plan for not just fewer homes over the next ten years, but for significantly fewer, is unacceptable, and limits the capacity of the Council to deliver on the laudable Priorities outlined in this LHS.</p> <p>Providing enough homes for people to live in is critical to achieving the overarching aims of government policy. The methodology for the MATHLR risks creating housing scarcity rather than choice.</p>	<p>HNDA3 for the South East Scotland area achieved robust and credible status from the CHMA on Thursday 28th July 2022. This included an updated existing need figure for Fife (Central and South) of 1,700.</p> <p>The MATHLR sets a minimum figure (based on HNDA findings and an additional 25% flexibility) and Fife Council, as Planning Authority, will identify a Local Housing Land Requirement for Fife. To promote an ambitious and plan-led approach, the Local Housing Land Requirement is expected to exceed the 10-year MATHLR set out in NPF4. The Housing Land Requirement will be reviewed as part of the Local Development Plan review taking account the requirements set out within the LHS.</p> <p>The Local Development Plan delivery programme will establish a deliverable housing land pipeline for the Local Housing Land Requirement. The purpose of the pipeline is to provide a transparent view of the phasing of housing allocations so that interventions, including infrastructure, that enable delivery can be planned. Where sites earlier in the deliverable housing land pipeline are not delivering as programmed, and alternative delivery mechanisms identified in the delivery programme are not practical, measures will be considered to enable earlier provision of long-term deliverable sites (7-10 years) or areas identified for new homes beyond 10 years. De-allocations will also be considered where sites are no longer deliverable. The annual Housing Land Audit will monitor the delivery of housing land to inform the pipeline and the actions to be taken in the delivery programme.</p>
<b>Housing Need</b>	<p>Key to this planned under delivery is the limited nature of the South-East Scotland (SES) HNDA, which, although confirmed as “robust and credible” by the CHMA, fails to capture the true extent of the need and demand for new homes in Fife.</p>	<p>Figures have reduced due to changes in the methodology applied for calculating existing need. This saw a large reduction in the measurement of overcrowded and concealed households through the Scottish Government issuing guidance to only count</p>

LHS Link	Public Consultation Comments	Responses
	<p>Only the below three categories are considered when assessing the existing need: • Homeless/housing insecurity. • Both overcrowded and concealed. • Requiring specialist housing.</p>	<p>households which are both concealed and overcrowded. Existing need is based on Local Authorities own methodology rather than the HNDA Tool default which has produced higher results than the default position. See comment below for further info.</p>
<b>Housing Need</b>	<p>The SES HNDA is flawed in that it has a very limited view of household needs and bases future population trend predictions on the past. Household needs currently not identified in the HNDA tool include single adults living with parents or in shared accommodation, overcrowded households with a lack of bedroom space, an aging population living in homes that no longer meet their needs, and homes that are not fit for purpose i.e. dilapidated housing stock. To use previous population trends is flawed in that they reflect a period of post-2008 recovery and a period of continued undersupply of new housing.</p>	<p>The existing housing need figures show the present net demand for social housing and the shift to smaller / single person households was included within the future needs figures as part of household growth. The approach follows the HNDA guidance and methodology for assessing both overcrowded and concealed households: <a href="https://www.gov.scot/publications/estimating-concealed-family-rates-with-overcrowding-using-scottish-survey-data-2016-2018/pages/12.aspx">Estimating concealed family rates with overcrowding using Scottish survey data (2016-2018) (www.gov.scot)</a> Within the HNDA guidance those in substandard/BTS housing can have housing needs met through an 'in-situ' solution and therefore should not be counted in the existing housing need figures. A range of scenarios were developed as part of the HNDA process including future household growth. This was conducted at a time when the impacts of the Covid-19 and Brexit were uncertain.</p>
<b>Housing Need</b>	<p>It is vital that enough homes are delivered across all tenures to meet people's changing needs. It is equally vital that the HNDA fully captures genuine need. The baseline tool is unfit for purpose and fails to capture even a fraction of the genuine need for new homes. Local surveys are important here, as these enable the fuller understanding of local need. Going beyond the minimum necessary requirements for the HNDA is the only way to ensure enough homes are built to meet people's changing needs. There needs to be an adequate supply of land that is deliverable/unconstrained.</p>	<p>The LAs own existing need was used which was based on the most recent homeless figures, at the time of writing, to reflect the impacts of the Covid-19 pandemic. This also incorporated figures on support needs / specialist forms of housing which were not part of the HNDA Tool Default.</p> <p>The reliance on primary data is likely to have over-estimated housing need in Fife and guidance recommends a range of robust secondary data sources are utilised to ensure needs are not over-estimated. The Scottish Government determined the approach used for SES HNDA as 'Robust and Credible' on the 28<sup>th</sup> July 2022.</p>

LHS Link	Public Consultation Comments	Responses
<b>Housing Supply</b>	Section 1.4 states that “Housing to 2040 sets out an ambitious aspiration to deliver an additional 100,000 affordable homes by 2032” (p.10). This is contrary to the Scottish Government’s position, outlined in the Programme for Government published in 2021, which makes clear that the Scottish Government is committed to delivering 110,000 affordable homes by 2032.	The LHS has a strategic link with Housing to 2040 which states ‘a further 100,000 affordable homes will be delivered over 10 years up to 2032’. The LHS has targets identified for current affordable housing programmes and aims to develop a Phase 4 programme to continue delivery of affordable housing in line with the Scottish Government Housing to 2040 aspiration. The capacity of phase 4 and contribution towards the aspiration will depend on funding available to support the phase 4 programme.
<b>Housing Supply</b>	There is no reference to viability in the suggested locational split of the MATHLR. It is important to deliver new homes where there is a need for them. It is also important to deliver new homes in areas where they can feasibly be delivered. The continued allocation of sites that are considered to be constrained due to marketability in the agreed HLA requires to be reviewed.	The MATHLR has been set by the Scottish Government through NPF4. This is a minimum figure (based on HNDA findings and an additional 25% flexibility) and Fife Council, as Planning Authority, will identify a Local Housing Land Requirement for Fife. 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 NPF4. The Housing Land Requirement will be reviewed as part of the Local Development Plan review taking account the requirements set out within the LHS. The Housing Land Audit records “constrained sites” as non-effective. Therefore, these sites do not contribute to the effective land supply.
<b>Housing Supply</b>	The most recently agreed HLA is the 2022 HLA, which demonstrates a lower “unconstrained land supply” than the 2020 HLA, referenced in the draft LHS. It is also worth noting that this figure is not the supply of land considered to be effective within the five-year period, and that only approximately one third of this supply currently has planning permission. The 2022 HLA also demonstrates that there have been no financial years since 2009/10 where completion levels have been recorded even close to the annual requirement as set out in the adopted LDP. In fact, in the 13 financial years shown, cumulative completions total	The 2020 Housing Land Audit (HLA) was the most recent available at time of writing. A 431 reduction in unconstrained land supply is noted between the 2020 HLA and 2022 HLA. Although past trends in housing delivery increase to 1,009 new homes each year between 2012/13 and 2021/22, land supply still exceeds past completions. The most up-to-date HLA will be used when reviewing the Local Development Plan. The revised Local Development Plan (LDP2) will review all undeveloped land allocations/proposals and deallocate sites which are no longer deemed to be effective/developable.

LHS Link	Public Consultation Comments	Responses
	<p>only just over 50% of the cumulative requirement. Fife Council is facilitating the delivery of half the number of new homes that it should be, based on its own projections for housing need.</p> <p>Using the 2022 HLA, there is currently a large all-tenure shortfall of housing land across the entire Fife Council area. This is clearly evident, and the ongoing unmet shortfall (at least, within the Dunfermline and West Fife LHMA) was confirmed in the recent appeal decision for Land at Cuddyhouse Road, Kingseat (PPA-250-2345), wherein the reporter states: “Although I cannot say with certainty what the actual shortfall is I am persuaded that the evidence shows that it is most likely to be significant in scale.” (Para. 36)</p> <p>Given the recognised significant shortfall, the persistent and ongoing under delivery, and the LHS Priorities, it is unfortunate that the Council now seeks to significantly reduce its targeted output.</p>	<p>The Local Development Plan review will identify and allocate deliverable land 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 important linkages between the Local Development Plan, HNDAs and LHS established in the current system remain in place with the requirements set out within the HNDAs/LHS being used to inform the housing land requirement and site allocations.</p> <p>The revised Local Development Plan will include a delivery programme which will establish a deliverable housing land pipeline for the local housing land requirement; providing a transparent view of the phasing of housing allocations so that interventions, including infrastructure, that enable delivery can be planned. The annual HLA will monitor the delivery of housing land to inform the pipeline and the actions to be taken in the delivery programme.</p> <p>Housing targets previously set by the Strategic Development Plans (SESplan and TAYplan) have been at a high level, particularly across central and southern Fife (SESplan area) where targets were unrealistic. The Council are of the opinion that this is something that should not be replicated through NPF4. The Council believes that there needs to be a greater focus on the creation of great places, and on delivering homes where they are needed and supported through the development plan process with less emphasis placed on pursuing housing target numbers (whilst still meeting identified need). This must involve a look at communities and the amount of housebuilding that an area can sustain, particularly relating to infrastructure. Total completion rates for all tenures have varied from year to year and have not followed any specific pattern. Until 2008/2009 the overall trend</p>

LHS Link	Public Consultation Comments	Responses
		<p>had been upwards, but the effects of the recession have had a significant effect on housebuilding. The 6 years prior to 2016/17 were the 6 years with the fewest completions since records began in 1987. However, 2016/17 and 2017/18 showed signs of an upturn in house building in Fife with the highest number of completions since the recession (1,303 completions in both years). In 2020 and 2021, Scotland was in the Coronavirus Pandemic where guidance stated by the Scottish Government was to stay at home and not to undertake any non-necessary journeys and to socially distance from others. The temporary closure of housing sites due to the pandemic, combined with the EU Exit, and the more recent Ukrainian war, has caused a number of challenges for the housing industry including labour shortages and disrupted material supply chains resulting in significant cost increases. In 2021/2022, the completion figure rose above 1,000 houses which is similar to pre-pandemic figures seen in 2019.</p>
<p><b>Do you have any comments on Priority 1 - Ending Homelessness (pages 39 - 46)?</b></p>		
<p><b>Priority 1</b></p>	<p>Could MSP's be lobbied to change legislation to allow FC to encourage compulsory downsizes when a person has a property which is too large for them. The legislation appears to cover over crowding but not under accommodating.</p>	<p>The LHS recognises 37% of dwellings are under-occupied. Incentive schemes are currently used to encourage downsizing when a property is no longer required in Fife. A change in legislation is not within the scope of the LHS and is out with Fife Council control.</p>
<p><b>Priority 1</b> <b>Priority 3</b></p>	<p>We think a particular emphasis on housing refugees should be considered as this is a complex area and it may be likely that we will continue to see demand in this area.</p>	<p>Fife Council have no control over neither UK or Scottish Policy in matters relating to immigration or refugees. We do however ensure that all processes related to immigration or refugees are included within our working policy. Local Housing Strategy does not reflect immigration or refugee policy as a matter of course, but further information relating specifically to high areas of demand can be found through:</p>

LHS Link	Public Consultation Comments	Responses
		<a href="#">Supporting Ukraine   Fife Council</a> <a href="#">Afghanistan Crisis   Fife Council</a>
<b>Priority 1</b>	<p>We would also highlight the issue of temporary emergency accommodation for example in the event of crisis evacuation for fire, flood, power outage etc. This is again in response to current issues in emergency preparedness.</p>	<p>Fife Council’s Resilience Policy and Framework aims to ensure that Fife Council carries out its duties under the Civil Contingencies Act 2004 (as amended in the Civil Contingencies Act Amendment Regulations 2013) (CCA) and effectively prepares for, responds to and recovers from any incident impacting on Fife’s communities. It is not within the scope of the LHS to determine housing services responsibilities as this is outlined by the Emergency Resilience Team. The below outlines the assurance that housing services have committed to through the Fife Council emergency plan: <i>“3.4.2 Heads of Service/Senior Managers/ Critical Activity Owner: - Ensure their Service/ area of responsibility is effectively prepared to respond to any incident both during and out with office hours”</i></p>
<b>Housing Supply Priority 1 Priority 2</b>	<p>It is vital that enough homes are delivered across all tenures to tackle the issue of homelessness. A more robust stock of homes, across the spectrum, and across all localities, will enable the issue to be tackled more broadly.</p>	<p>Through the RRTP and SHIP it is acknowledged the requirements of new affordable housing within Fife to tackle the issue of homelessness. Both documents are referenced through “Ending Homelessness” and “More homes in the right places”. The HNDAs have been used to provide robust data and targets for the LHS, SHIP and RRTP.</p>
<b>Do you have any comments on Priority 2 - More Homes in the Right Places (pages 47 - 49)?</b>		
<b>Priority 2</b>	<p>Whilst I support the draft plan for Priority 2 I believe there is an element missing. There should be consideration under this area about overall location of homes and the impact on both communities and prospective tenants of developments. New housing can be seen negatively by communities, especially where there is then stereotypes of ‘social housing’ and issues around ‘problem’ tenants. An outcome of this can be that tenants placed into the new homes are not welcomed into the community and</p>	<p>Depending on the size of potential developments either an information or consultation event is held with local communities to provide details on future proposals for developments. Through the LHS options for a placemaking pilot within the affordable housing programme will be considered to test out the process of creating good quality places that promotes people's health, happiness and wellbeing, with people and communities central to the process. This is in line with emerging planning policy</p>

LHS Link	Public Consultation Comments	Responses
	<p>could find it hard to make a new home there, this has certainly been the case in the village I live in. I would suggest that a key aspect of the more homes in right places is both a strategy around understanding recent developments within communities along with ensuring that housing partners should undertake local community engagement to ensure their tenants have the best opportunity to integrate into their new communities. This draft plan seems to reinforce a context of housing standing alone from the community it's in and that's not a positive position.</p>	<p>and the concept of 'place' will be progressed through working with architects, transport and planning at the initial stages of a site development. If the pilot is successful, the lessons learned, and skills will then be transferred to future sites.</p>
<b>Housing Supply</b>	<p>The overall proposed supply of new homes is far too low, for the reasons set out above.</p>	<p>The MATHLR has been set by the Scottish Government through NPF4. This is a minimum figure (based on HNDA findings and an additional 25% flexibility) and Fife Council, as Planning Authority, will identify a Local Housing Land Requirement for Fife. 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 NPF4.</p>
<b>Priority 2</b>	<p>In respect of brownfield development, HFS recognises its importance but there needs to be a hybrid/balanced approach to land allocation that also provides a release of greenfield land. This is due to the inherent constraints on deliverability/timeline associated with brownfield development.</p>	<p>We will ensure the delivery of high quality and affordable housing in the right locations. Significant growth should be mixed use and where possible targeted on brownfield sites which support wider regeneration efforts.</p> <p>Fife Council have agreed a town centre housing approach to meet housing need and demand, identifying sites for new homes in town centres across Fife to facilitate regeneration. The approach is led by the Council's Town Centre Development Unit supported by housing partners.</p>
<p><b>Do you have any comments on Priority 3 - A Suitable Home (pages 50 - 58)?</b></p>		
<b>Priority 2</b>	<p>We need more 2-bedroom bungalows and 4 bed + properties to be build.</p>	<p>The LHS recognises the need for more one and two bed properties with 79% of FHR applications requesting these property sizes. Size requirements that best meet need and demand are considered when agreeing the mix of new homes. 5% of new build homes</p>

LHS Link	Public Consultation Comments	Responses
		provided through affordable housing programmes will be 5=/+ bed.
<b>Priority 3</b>	We would like to identify the issue of housing for vulnerable young people e.g., care leavers. We would like to see increased emphasis on ensuring suitable housing for such high-risk individuals where risks to their health and well-being are minimised and they are offered a high level of support. We also note the reference to the Health and Social Care Strategic Plan and increasing the role of housing officers in preventive approaches. We would welcome collaboration in this area for example joint training.	Within outcome 3.1, the LHS sets out an indicator to increase the number of care leavers housed per year as well as a development area to mainstream the National House project and support Barnardo’s Gap Homes initiatives. Collaborative working is already being addressed through the Homes First Strategy where work is jointly carried out with NHS Fife and the Health & Social Care Partnership.
<b>Housing Supply</b>	We support the aims of this policy and broadly support the content. It will be important to recognise that for open market homes, the specific needs of potential residents will not be known in advance. We, therefore, consider that there should be scope within the any relevant policy for flexibility over some of the specific standards to tailor them to the needs of the prospective homeowner. We would welcome the opportunity to discuss this matter with the Council in more detail.	The revised draft NPF4 supports development proposals for new homes that improve affordability and choice by being adaptable to changing and diverse needs, and which address identified gaps in provision. This could include: self-provided homes; accessible, adaptable and wheelchair accessible homes; build to rent; affordable homes; a range of size of homes such as those for larger families; homes for older people, including supported accommodation, care homes and sheltered housing; homes for people undertaking further and higher education; and homes for other specialist groups such as service personnel. Fife Council shall develop this further through the review of the Local Development Plan; working with key partners to look at how we can best shape policy to meet emerging needs. The type of houses delivered by housing providers will also become more important as demographic changes continue. Not only do homes need to be delivered in the right locations alongside sustainable modes of travel but they need to be built to accessible standards and of the right size to meet the needs identified in the relevant HNDA.



LHS Link	Public Consultation Comments	Responses
<b>Priority 2</b> <b>Priority 3</b>	We support the delivery of affordable housing. A lack of affordable homes may negatively impact lower income families by reducing the amount of time and finances available to address other health and wellbeing needs. A greater volume of homes of all tenures requires to be delivered to address the current need and demand gap. The provision of affordable homes as part of a mix of tenures helps to create mixed and balanced communities.	Priorities are already identified within the LHS to deliver new affordable homes to meet housing needs in Fife and explore options to develop a phase 4 affordable housing programme to continue addressing need.
<b>Housing Supply</b> <b>Priority 2</b>	It is vital that enough homes are delivered across all tenures to meet the need and demand within each local authority area and housing market area. This includes the delivery of affordable homes. A significant proportion of these affordable homes are delivered via the affordable housing policy requirements for the delivery of market housing. As such, it is vital that these homes are also encouraged. The housing crisis is acute, and requires numerous solutions, including the delivery of new homes, and the return of empty homes.	The LHS recognises affordable housing is provided through wider Scottish Government initiatives, such as Open Market Shared Equity, the National Housing Trust, Mortgage to Rent, Rural Housing Fund, empty homes loans, self-build and town centre projects, acquisitions as well as new build affordable housing programmes. The affordable housing requirement from private developers is noted as one of the main funding and delivery mechanisms for affordable housing in the LHS, with the benchmark contribution figure outlined the Affordable Housing Supplementary Planning Guidance.
<b>Do you have any comments on Priority 4 - A Quality Home (pages 59 - 66)?</b>		
<b>Priority 2</b> <b>Priority 5</b>	Homes with poor insulation or inefficient heating can result in fuel poverty, causing stress for lower income families who may be unable to afford both fuel and food. On average, 89% of all new homes built by Homes for Scotland members met at least an EPC grade 'B' standard. In terms of carbon reduction, surveys show that, increasingly, home builders are embedding zero emissions heating systems and enhanced energy-efficiency measures into their developments.	Comments noted. A number of indicators are in place to support households experiencing poverty/fuel poverty. The LHS aims to deliver 95% of new affordable homes which meet Greener Standards and 95% of homes which meet EPC rating of A or B. Both these indicators increase to 98% by 2026-27.

LHS Link	Public Consultation Comments	Responses
<b>Priority 2</b> <b>Priority 5</b>	The Climate Change Act 2019 commits Scotland to net-zero emissions of all greenhouse gases by 2045. New homes are measured against building standards which outline a number of criteria which all developments must meet in order to gain a building warrant. With respect to environmental sustainability, home builders must comply with reducing carbon emissions through minimising both the waste of energy and the use of carbon-based energy systems.	As above, the LHS aims to deliver 95% of new affordable homes which meet Greener Standards and 95% of homes which meet EPC rating of A or B. Both these indicators increase to 98% by 2026-27. It is recognised within the LHS that all new affordable homes support the Scottish Government’s carbon reduction targets, sustainable design and placemaking principles
<b>Priority 2</b> <b>Priority 5</b>	In addition to the expansive social and economic benefits of home building, the delivery of a higher number of new homes would provide increased environmental benefits. Increasing the scale of well-designed, energy-efficient homes also plays a key role in delivering improvements to health, education, regeneration and carbon reduction outcomes as well as housing access for all.	Options are being explored for a Phase 4 Housing Supply Programme to further increase the number of new homes delivered after 2024. This will heavily depend on funding, investment and inflation. It is recognised within the LHS that all new affordable homes support the Scottish Government’s carbon reduction targets, sustainable design and placemaking principles. Housing for Varying Needs and Secured by Design are adopted as minimum design standards.
<b>Do you have any comments on Priority 5 - A Warm Low Carbon Home (pages 67 - 74)?</b>		
<b>Priority 5</b>	We believe the discussion of Heat Networks should include language which indicates that any connection is viable and practically deliverable. New home building is very well placed to meet the net-zero ambition with new homes built today emitting 75% less carbon than those built in 1990 and the new building regulations are set to reduce carbon emissions by a further 32%.	The LHS aims to deliver 95% of new affordable homes which meet Greener Standards. An LHS development area is in scope to provide a Local Heat & Energy Efficiency Strategy by then end of 2023 which will set out a delivery plan contributing to the target of net zero by 2045.
<b>Do you have any comments on Appendix 1: LHS Outcome Plan 2022-2027 (pages 77 - 94)?</b>		
	No Comments	-

**LHS Link****Public Consultation Comments****Responses**

Do you feel there are any priorities or actions missing from the LHS 2022-2027?		
<b>Priority 2</b>	As per my response to Priority 2 - there should be actions around ensuring housing delivery partners engage with communities to ensure proper change management	Depending on the size of potential developments either an information or consultation event is held with local communities to provide details on future proposals for developments. Through the LHS, options for a placemaking pilot within the affordable housing programme will be considered to test out the process of creating good quality places that promotes people's health, happiness and wellbeing, with people and communities central to the process. This is in line with emerging planning policy and the concept of 'place' will be progressed through working with architects, transport and planning at the initial stages of a site development. If the pilot is successful, the lessons learned and skills will then be transferred to future sites.
<b>Priority 2</b>	Using brownfield sites instead of green belt	We will ensure the delivery of high quality and affordable housing in the right locations. Significant growth should be mixed use and where possible targeted on brownfield sites which support wider regeneration efforts. Fife Council have agreed a town centre housing approach to meet housing need and demand, identifying sites for new homes in town centres across Fife to facilitate regeneration. The approach is led by the Council's Town Centre Development Unit supported by housing partners.
<b>Priority 2</b>	Housing strategies should refer to all tenures, yet the scope of the LHS appears to be too narrow, with its focus predominantly on affordable housing. There must be a recognition of the contribution of the private sector towards the delivery of affordable homes (RSL/Council delivered) and 'affordable' homes for private sale/rent.	The affordable housing requirement from private developers is noted as one of the main funding and delivery mechanisms for affordable housing in the LHS, with the benchmark contribution figure outlined the Affordable Housing Supplementary Planning Guidance.