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Your ref: -
Our ref:

07 August 2023

Dear Mhairi,

FIFE LOCAL HOUSING STRATEGY 2022-2027

Thank you for submitting your local housing strategy (LHS) for the period 2022-2027 for review and feedback. The review process is now complete with comments provided by Scottish Government Policy Teams, the More Homes Division South East Area Team and external peer reviewer Claire Frew, from South Lanarkshire Council.

This letter sets out what the reviewers considered were the particular strengths and the main areas for consideration. The accompanying template includes all the comments that were made on the LHS and we encourage you to consider these before finalising your LHS.

Areas of Strength

Engagement and Consultation

- We welcome the approach taken by the Council to engage widely to help the development and content of the draft LHS. The draft highlights a number of different approaches that were taken by the Council including gathering feedback from surveys as well as workshops that took place. We particularly welcome the approach taken by the Council to prepare a report on the consultation findings.

Place Making and Communities

- The LHS provides a good explanation of the Council's approach to supporting new and existing neighbourhoods based on Place-Making principles as well as evidence of the partnership working and local community engagement processes

that are in place to help ensure the best outcomes when creating or improving places. It also covers the Council's use of the Place Standard Tool together with how it has engaged with communities and how these have helped inform the development of the LHS. In addition, the document also covers the nature and function of town centres within the area and how the Council is using the Town Centre First Principle. Finally, it is helpful to see Fife Council's commitment and emerging approach to supporting self-build in Fife.

Preventing and Addressing Homelessness

- There is a strong prevention-led approach to homelessness and the provision of services demonstrated within the LHS, with particularly good examples of Rapid Rehousing Transition Plans.

Specialist Housing Provision

- We welcome the information included in the LHS setting out what the current specialist provision homes needs are and the Council's plans for delivering more homes through the AHSP. We welcome the Council's proposal to increase the current wheelchair accessible housing target from 5% to 6.5% and note that no private sector target has been put in place yet, but would encourage the Council to ensure that one is. We welcome the proposed private sector mapping exercise and note that this is to enhance social rented wheelchair accessible housing and not to increase the supply of wheelchair accessible homes in the private sector. The Council will be aware from the wheelchair accessible housing report prepared by Scotland's Housing Network that there are a number of Council's who have put in place private sector wheelchair accessible housing targets and the Council may wish to consider engaging with these authorities on this particular issue.

Areas for Consideration

Housing Delivery – Housing Supply Target

- The Housing Supply Target (HST) – which should be broken down into social/affordable and market housing – should be presented as a single figure. Where this is possible, we would expect more recent information to inform the HST than was used in the Minimum All-Tenure Housing Land Requirement (MATHLR). The HNDA Managers Guide states that developing HSTs begins with the HNDA as baseline 'policy free' estimates which are then impact tested in relation to practical and policy factors. As well as the HNDA, the other factors that should be considered to set the HST are items such as available resources, recent development rates, planned housing, construction rates etc. The full list of factors is set out in the [HNDA Manager's Guide](#). As the MATHLR is a minimum housing land requirement, the Council should consider whether the HST is reflective/supportive of this i.e. the bottom of the range in the current HST is substantially lower than the minimum. This may, however, be circumvented where the HST is presented as a single figure.

Housing Delivery – Rural Housing

- While the LHS recognises the challenges of delivering homes in rural areas, and that the Council will aim to deliver more homes in rural areas, the Council should consider including information on how that will be achieved, for example through closer engagement with rural housing enablers and through encouraging possible

applications by eligible bodies for funding from the SG Rural and Islands Housing Fund.

Housing, Health and Social Care Integration

- We would encourage the Council to consider including more information on partnership working with the Health & Social Care Partnership and shared strategic commitments.

We hope you will find these comments useful in finalising your LHS. When the final LHS is submitted to Scottish Ministers, we would ask that you include along with it an accompanying letter that clearly states how the areas for improvement, identified through this review process and set out above, have been or will be addressed.

If you would like to talk over the feedback in more detail, we would be happy to meet with you and if you would like for Claire Frew, South Lanarkshire Council, peer reviewer to also attend, please let me know. If you do not think a meeting is necessary, we would be happy to talk over the feedback more generally at one of our regular programme meetings.

Reviewing and Reporting on Progress Annually

It is a statutory requirement for a LHS to be kept under review and the Scottish Government expects all local authorities to review and report on progress annually. The LHS guidance encourages local authorities to record actions within their LHS Outcomes Action Plan and for these to be recorded in a way that best supports effective annual monitoring. I would be grateful if you could please ensure that a copy of your annual report/monitoring report is sent to David Steane, copied to me.

Regards

Alastair Dee

ALASTAIR DEE
More Homes Division South East Area Manager