

## **Scottish Parliament's Local Government, Housing and Planning Committee**

### **Scottish Government's draft fourth National Planning Framework.**

#### **Response from Fife Council**

**10 February 2022**

**The Committee understands the Scottish Government produced an initial default estimate for the MATHLR then asked local authorities to, where relevant, propose locally adjusted estimates. Information is requested on the process followed by your local authority to determine your locally adjusted estimate.**

In assessing the MATHLR proposed by the Scottish Government, Fife Council followed the steps set out within the consultation document. Working with our Housing Market Partnership (HMP) stakeholders to consider and discuss the initial default estimates. Work was linked to the project management framework for the South East Scotland and Tay Cities Housing Need and Demand Assessment (HNDA) with Fife Council working as part of the two regional groups.

#### Engagement

A co-ordinated consultation was carried out by Fife Council's Planning and Housing Services. A common approach was applied across the whole of Fife and HMP stakeholders were notified of the NPF4 process and default calculations covering both the Tay Cities and South East Scotland regions. Initial views on the default figures were sought at the start of the process with further communication in late May once we had proposed locally adjusted figures.

A Tayside Housing Market Partnership Event was held on 25<sup>th</sup> May 2021, this brought together the four local authorities from the previous Tayplan Strategic Development Plan Authority (Dundee City Council, Perth & Kinross Council, Angus Council and Fife Council) with the stakeholders and delivery partners who comprise their HMP. The objective of the event was to inform each Council's response to the Scottish Government consultation on the initial default estimates provided in February 2021.

Delegates from the four local authorities and HMP were presented with background information on the Tayside HNDA process, as well as emerging evidence to support the delivery of local estimates: including primary research findings from a Housing Need and Demand Household Survey completed in April 2021. A briefing session on the NPF4 framework to MATHLR was then presented, including the Scottish Government's methodology, initial default estimates and the sources used to provide robust evidence of alternative local estimates. Partners were invited to discuss the alternatives, provide further evidence and support/challenge the assumptions. Summary of findings from the Tayside NPF4 stakeholder engagement event was submitted to the Scottish Government with Fife Council's response to the consultation.

#### Setting MATHLR Figure

Fife Council were already working together with the authorities that make up the Edinburgh and South East Scotland, and Tay Cities areas to prepare new HNDAs. Whilst the final outputs of the HNDAs were not anticipated until later in the year initial local outputs were made

available to inform the MATHLR consultation. The Council looked at data which demonstrated existing housing need for homeless/temporary, both overcrowded and concealed and support needs/special forms of housing across the whole of Fife. These figures were shared as part of our response to the Scottish Government and the findings input into the Scottish Government's excel calculator.

In terms of household projections, Fife Council agreed with Scottish Government's use of the NRS 2018-based principal household projections (equivalent to step 1 of the HNDA Tool). However, in our response we highlighted concerns we had that the completion levels listed in the Scottish Government master Excel Spreadsheet differed from, and did not reflect, the Fife Council figures published within the Housing Land Audit 2019. We note that the two different processes (Building Standards returns and Housing Land Audit) are used for different purposes. From a planning perspective, we take completions data from the Housing Land Audit (which is prepared in consultation with the house building industry and Homes for Scotland).

Fife Council accepted the Scottish Government's flexibility allowance levels given Fife's mix of urban and rural areas and varied levels of housing market activity.

In tandem with the HNDA, work was undertaken on the minimum numbers required to sustain Fife's strategic growth areas and affordable housing programme, looking at potential impacts on how we deliver the Council's Reform and Recovery agenda particularly through the revised Local Outcome Improvement Plan (LOIP) and the forthcoming Local Development Plan (LDP) review.

Housing targets previously set by SESplan were unrealistic and not possible to deliver; the Council believed this is something that should not be replicated through NPF4.

The revised estimates were presented to Fife Council's Economy, Tourism, Strategic Planning & Transportation Sub Committee for consideration and approval. A copy of the committee report was submitted along with Fife Council's response to the consultation.

### LDP Review

Through the review of the LDP Fife Council will consider whether there should be an additional requirement beyond the minimum number set out within NPF4 taking account of the completed HNDAs.

There is a need to plan for a steady growth scenario in Fife, agreeing a housing land requirement that will ensure delivery of the strategic development areas that are currently being implemented or progressed through planning applications, whilst maintaining the ambition to address mid Fife's needs and growth founded on the Levenmouth rail link.

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. This must involve a look at communities and the amount of housebuilding that an area can sustain, particularly relating to infrastructure. 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.