Renfrewshire Council

To: **Communities, Housing and Planning Policy Board**

On: **26 October 2021**

Report by: **Chief Executive and Director of Communities and Housing Services**

Heading: **National Planning Framework 4 – Housing Land Requirements**

1. Summary

1.1 This report provides an update on the National Planning Framework 4 preparation and in particular the Scottish Government's consultation on a Minimum All -Tenure Housing Land Requirement for Scotland.

1.2 Officers prepared a response to the consultation as part of the Glasgow City Region Housing Market Partnership. A copy of the response is attached at Appendix 1.

2. Recommendations

2.1 It is recommended that the Board:

(i) Notes the recent Scottish Government consultation on Housing Land Requirements to inform the emerging National Planning Framework 4 and the consultation response attached at Appendix 1.

3. Planning Reform Programme

3.1. The Scottish Government are currently progressing a detailed work programme to implement the Planning (Scotland) Act 2019. This includes the preparation of National Planning Framework 4 alongside further regulations, plans and strategies which will support proposals to transform the Scottish planning system.

3.2. This process involves extensive consultation and officers are engaging with the Scottish Government to help shape National Planning Framework 4.

4. National Planning Framework 4 – Housing Land Requirements

4.1 The Planning (Scotland) Act 2019 requires the National Planning Framework to include ‘Targets for the use of land in different areas of Scotland for housing’.

4.2 The Scottish Government wrote to Local Authority Heads of Planning and Heads of Housing to seek the input on meeting the statutory requirement of the 2019 Act relating to housing. A discussion paper setting out a proposed methodology that could be used for setting targets for housing was produced by the Scottish Government in March 2020. This was then followed up by a consultation on Minimum All-Tenure Housing Land Requirements in February 2021.

4.3 An indicative and conditional initial view to the Scottish Government’s consultation is attached at Appendix 1. The response has been submitted as a collaborative approach by the Glasgow City Region Housing Market Partnership, which includes Renfrewshire Council.

4.4 The key objectives set out in the consultation included the aims of providing greater clarity about the amount of land that will be required for housing and to help ensure that resources are freed up to enable planning to act a positive enabler of better co-ordinated development that contributes to increasing housing delivery and placemaking.

4.5 National Planning Framework 4 will identify a minimum all-tenure housing land requirement as a starting point in an on-going process to ensure a consistent approach to delivering housing land across Scotland.

4.6 The Scottish Government confirmed that Local Authorities cannot go below the minimum all-tenure housing land requirement set out in the National Planning Framework.

4.7 The consultation response welcomes a consistent approach but raises concerns to such a simplistic approach which does not go into the detail that housing need and demand assessments require to ensure the housing needs and requirements of our communities are identified. It is therefore significant to note that the submitted response is an indicative and conditional initial view as this minimum all-tenure housing land requirement will set the basis for a detailed housing need and demand assessment which will inform and provide a robust evidence base for the preparation of Renfrewshire Local Development Plan 3.

5. **Next Steps**

5.1 Officers will continue to engage with the Scottish Government and the Council will have an opportunity feed into the emerging draft National Planning Framework 4 and will update the Board where appropriate.

5.2 A consultation draft of National Planning Framework 4 is expected towards the end of 2021. The draft NPF4 will be laid before the Scottish Parliament. At the same time the Scottish Government will carry out extensive public consultation. It is anticipated that a final version of NPF4 for approval and adoption will be around spring/summer 2022.

Implications of the Report

1. **Financial** – None.

2. **HR & Organisational Development** – None.

3. **Community/Council Planning –** The National Planning Framework is a key document in establishing a land use framework to ensure that the right development happens in the right places that will benefit our communities, safeguard our environment and well as our natural, built and cultural heritage.

4. **Legal** – None.

5. **Property/Assets** – None.

6. **Information Technology** – None.

7. **Equality & Human Rights**

   (a) The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.

8. **Health & Safety** – None.

9. **Procurement** – None.

10. **Risk** – None.

11. **Privacy Impact** – None.

12. **COSLA Policy Position** – Not applicable.

13. **Climate Risk** - None.

Appendix 1

- National Planning Framework 4 – Consultation Response Minimum All-Tenure Housing Land Requirements.

List of Background Papers

(a) None.

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Glasgow City Region Housing Market Partner Strategic Housing Investment Plan
30th September 2021

Updated Minimum All Tenure Housing Land Requirement Submission
September 2021

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1 Context

1.1 This is to be read as supplementary to our initial submission of 17th June 2021 and in part in response to the issues raised at the feedback meeting organised by Scottish Government with the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan on 18th August 2021.

2 Regional Context

2.1 The Glasgow City Region Housing Market Partner Strategic Housing Investment Plan wishes to continue to emphasise the importance of regional spatial planning to the Glasgow city metropolitan area and the constituent local authorities.

2.2 Both the approved Strategic Development Plan (SDP) of July 2017 and Indicative Regional Spatial Strategy submitted to Scottish Government in April 2021, are premised on delivery of the compact city model, along with a focus for new development on brownfield sites, reduction of the need to travel and support for increased levels of active travel.

2.3 In relation to housing, the Indicative Regional Spatial Strategy seeks to reinforce regional efforts to create high quality places which deliver the right type of homes in the right locations by increasing the priority given to housing which supports regeneration activities, particularly, through the reuse of vacant and derelict land and higher density development around key transport nodes and existing centres. The need to retrofit existing aging homes and to reshape communities affected by multiple deprivation

around the principles of twenty minute neighbourhoods, are important issues in the Glasgow City Region.

2.4 Working collectively, within the same regional spatial framework and in the context of the regional functional housing market area, brings strength to the efficacy of regional spatial strategy delivery activities and remains a principle that the local authorities of the Glasgow City Region remain committed to. The eight local authorities see strength in working collectively and are of the view that National Planning Framework 4 should reflect the Glasgow City Region regional spatial strategy, as articulated currently within the Strategic Development Plan and emerging Indicative Regional Spatial Strategy, as well as the need for the constituent Local Development Plans to develop spatial strategies that align with that regional strategy.

2.5 In relation to new build, the current target within the approved Strategic Development Plan is to deliver 6,000 new homes each year to 2029 and the current land supply is over 100,000 potential new homes. However securing delivery at the rate required remains challenging particularly in respect of the decline in private sector brownfield flatted development delivery since the Global Financial Recession.

2.6 As highlighted within the Scottish Land Commission recent report on "Land for Housing: Towards a Public Interest Led Approach to Development" (https://www.landcommission.gov.scot), within the Glasgow City Region whilst the land is generally available, it is the lack of delivery and slower delivery, in those hard to develop urban brownfield locations where a public interest led approach to development is required. With the confluence of:

- blight resulting from vacant and derelict land;
- the need to reduce deprivation and improve health and wellbeing;
- the policy aim to deliver a compact city model and to reduce emissions; and,
- the development viability gap,

National Planning Framework 4 should consider specific spatial and other interventions to support public interest led housing development and delivery within the Glasgow City Region. When this city region is working the rest of Scotland also thrives.

Glasgow City Region Housing Market Partner Strategic Housing Investment Plan

Recommendations for National Planning Framework 4

National Planning Framework 4 should reflect the Glasgow City Region regional spatial strategy, as articulated currently within the Strategic Development Plan and emerging Indicative Regional Spatial Strategy, and the need for the constituent Local Development Plans to develop spatial strategies that align with that regional strategy.

National Planning Framework 4 should consider specific spatial and other public interest led interventions, to support housing delivery within the harder to develop locations within the Glasgow City Region.

3 Senior Officer Indicative and Conditional View of Initial Default Minimum All Tenure Housing Land Requirement - Summary of Update

3.1 Some elements of Housing Need and Demand Assessment 3 have now been progressed to draft stage and an approach to the apportionment of private sector mobile demand has been developed to enable the provision of an updated view of the local authority housing estimates (see Part 4).

3.2 In addition to the response of 17th June 2021, the Glasgow City Region local authorities are now providing further comment, regarding:

- Appendix Part 1 - Household Projections (Newly-Forming Households);
- Appendix Part 2 - Existing Housing Needs;
- Appendix Part 3 - Flexibility Allowance; and,
- Appendix Part 4 - Indicative and Conditional View of Initial Default Minimum All Tenure Housing Land Requirement .

3.3 Draft Housing Need and Demand Assessment 3 will require to go through its stakeholder engagement and as before, this response is an officer view pending publication of draft National Planning Framework 4 by which time the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan's Housing Need and Demand Assessment will be further advanced, the draft national policy context will be available, national policy adjustments may have been applied, and each local authority and the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan will be in a position to provide politically endorsed Council responses.

3.4 The Glasgow City Region Housing Market Partner Strategic Housing Investment Plan is sympathetic to the ambition to achieve a consistency of approach to the identification of Scotland-wide Minimum All Tenure Housing Land Requirements. In order to address the unique housing challenges of the different parts of Scotland it is recommended that National Planning Framework 4 provides a policy context that supports Local Development Plans and Local Housing Strategies to develop appropriate local solutions, and one which avoids constraining local approaches. In this regard, the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan have raised concerns regarding the setting of minimum targets and the blanket application of 25% flexibility (See Part 3). The proposed approach and process of Minimum All Tenure Housing Land Requirement setting, requires to be evidenced, justified, appraised, consulted upon, and endorsed by Parliament.

3.5 Minimums are unlikely to be the correct response in some areas of pressured demand and the policy context should not constrain the ability of authorities to set a housing land requirement appropriate to local circumstances. It is suggested therefore that the term "Minimum" should be removed from the national policy context. Additionally whilst not supportive of its blanket application, flexibility has been presented in order to support the Government in progressing to Draft National Planning Framework 4 stage.

Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Recommendation for National Planning Framework 4

It is recommended that National Planning Framework 4 provides a policy context that supports Local Development Plans and Local Housing Strategies to develop appropriate local solutions, and one which avoids constraining local approaches.

3.6 The following Summary Tables 1A and 1B set out the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan updated response to the Minimum All Tenure Housing Land Requirement consultation.

4 Senior Officer Indicative and Conditional View of Initial Default Minimum All Tenure Housing Land Requirement - Summary of Update

Summary Table 1A: Senior Officer Indicative and Conditional Summary View	
Household Projections (See Part 1)	**32,350**
Within this updated response, the authorities of the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan have utilised the National Records of Scotland Principal 2018-based Household Projection to develop draft Housing Estimates. The Glasgow City Region Housing Market Partner Strategic Housing Investment Plan will provide an updated view on the Household Projections, Existing Need and therefore Housing Estimates, following conclusion of its Housing Need and Demand Assessment 3, which will be undertaken as soon as practicable to inform preparation of National Planning Framework 4. On publication of draft National Planning Framework 4 a politically endorsed consultation response will be provided with a firmer view of the Housing Estimates and All Tenure Housing Land Requirement.	
Existing Housing Needs (See Part 2)	**6,350**
The Glasgow City Region Housing Market Partner Strategic Housing Investment Plan wishes to confirm that, whilst there are concerns around the default Existing Need inputs (see Part 2), to inform draft National Planning Framework 4 it is content to accept the Homeless in Temporary Accommodation, Overcrowded and Concealed method for all the Local Authorities at this stage. This will be reviewed as the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Housing Need and Demand Assessment 3 progresses and on publication of draft National Planning Framework 4, a politically endorsed consultation response will be provided with a firmer view of Existing Need, Housing Estimates and the Minimum All Tenure Housing Land Requirement.	
Housing Estimate: Existing Need plus newly Forming Households	**38,700**
Adjusted Housing Estimate (Mobile demand plus Policy Adjustments)	**40,319**
Flexibility Allowance (See Part 3)	**25%**
The Partner Strategic Housing Investment Plan has ongoing concerns regarding the blanket application of 25% Flexibility and the setting of minimum land requirements which in some circumstances, will constrain more appropriate locally appropriate approaches. However, in order to support the Government in progressing to Draft National Planning Framework 4 stage, Flexibility has been presented. On publication of draft National Planning Framework 4a politically endorsed consultation response will be provided with detailed comments on the proposed Land Requirements.	
Minimum All Tenure Housing Land Requirement (See Part 4)	**50,350**
The Partner Strategic Housing Investment Plan has developed a view of Housing Estimates adjusted to take account of how private sector mobile demand operates across the Glasgow City Region Housing Market Area and Flexibility has been presented. This response is conditional on conclusion of the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Housing Need and Demand Assessment 3 and publication of draft National Planning Framework 4 when a politically endorsed consultation response will be provided with a firmer view of the Housing Estimates and Land Requirements.	

Summary Table 1B:
Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Senior Officer Indicative and Conditional View of Initial Default Minimum All Tenure Housing Land Requirement

	SCOTTISH GOVERNMENT DEFAULTS			Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Indicative and Conditional INITIAL VIEW			
	Stage 1			Stage 2A	Stage 2B	Stage 3	
Local Authority	**Housing Estimate - Existing Housing Need plus Newly Forming Households**	**Flexibility 25%**	**Minimum All Tenure Housing Land Requirement**	**Adjusted Housing Estimate (Mobile demand adjustments applied) ***	**Local Adjusted Housing Estimate (Policy Adjustments)**	**Flexibility ****	**Indicative and Conditional Minimum All Tenure Housing Land Requirement (rounded)**
East Dunbartonshire	2,550	650	3,200	2,013	2,013	25%	**2,500**
East Renfrewshire	3,250	800	4,050	2,254	2,254	25%	**2,800**
Glasgow City	17,150	4,300	21,450	17,070	17,070	25%	**21,350**
Inverclyde	200	50	250	557	1,200	25%	**1500**
North Lanarkshire	5,050	1,250	6,300	5,897	5,897	25%	**7,350**
Renfrewshire	3,900	1,000	4,900	3,913	3,913	25%	**4,900**
South Lanarkshire	6,250	1,550	7,800	6,291	6,291	25%	**7,850**
West Dunbartonshire	350	100	450	715	1,680	25%	**2,100**
Glasgow City Region	**38,700**	**9,700**	**48,400**	38,710	40,319		**50,350**
Notes:				*** (See Part 4)**		**** (See Part 3**	

APPENDICES

1. Appendix Part 1 – Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Response - Household Projections (Newly-Forming Households)

1.1 A further note of caution is offered in respect of the use of the trend based National Records of Scotland projections.

1.2 As per the Housing Market Partner Strategic Housing Investment Plans prior submission, the National Records of Scotland Projections are policy neutral in that they estimate how many additional households would form if assumptions based on previous demographic trends in population growth and household formation were to be realised. The National Records of Scotland specifically state that *"The household projections are trend-based and are not, therefore, policy-based forecasts of what the Government expects to happen."*

1.3 Some further work has been undertaken for Housing Need and Demand Assessment 3 demonstrating how different the 2012 based National Record for Scotland projections are from what actually happened as recorded in the National Records of Scotland Household Estimates. This demonstrates that the Household Estimate in 2020 was relatively close to the low migration scenario for the Glasgow City Region. However, for each local authority the variations from the projections were significant in nearly all cases.

Figure 1.1, Glasgow City Region, National Records of Scotland 2012-based Household projection v National Records of Scotland Household Estimate, 2020

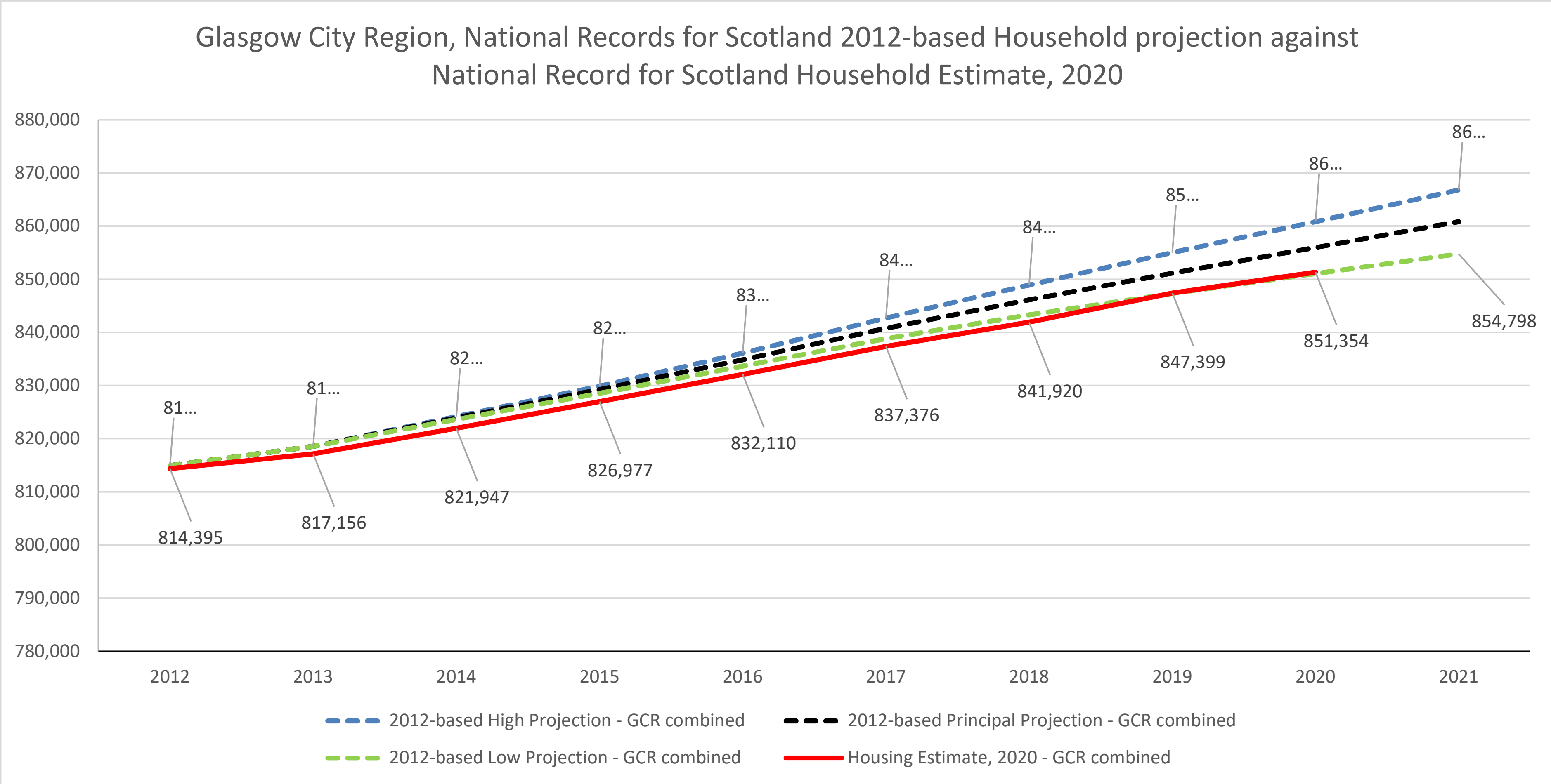
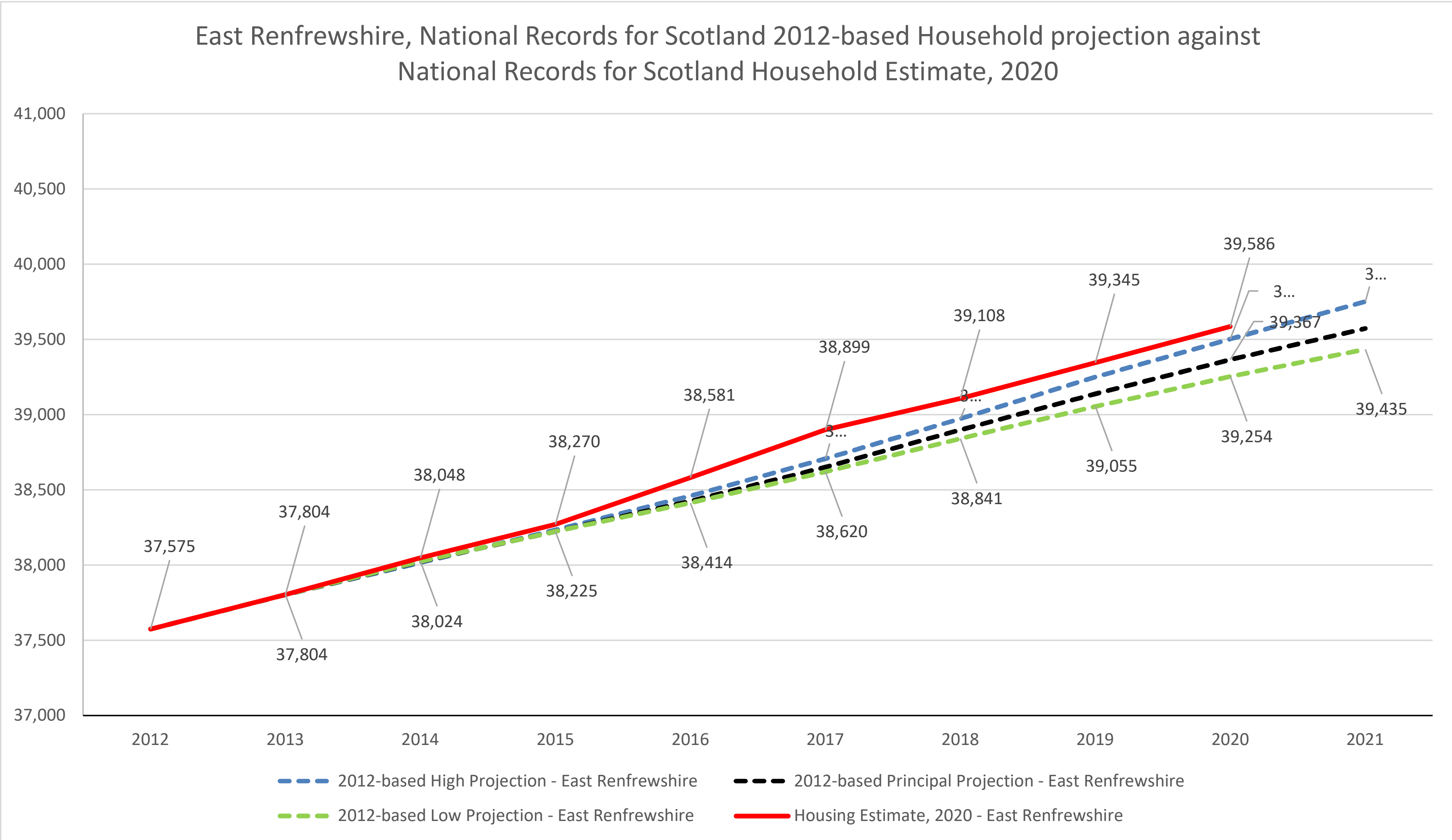
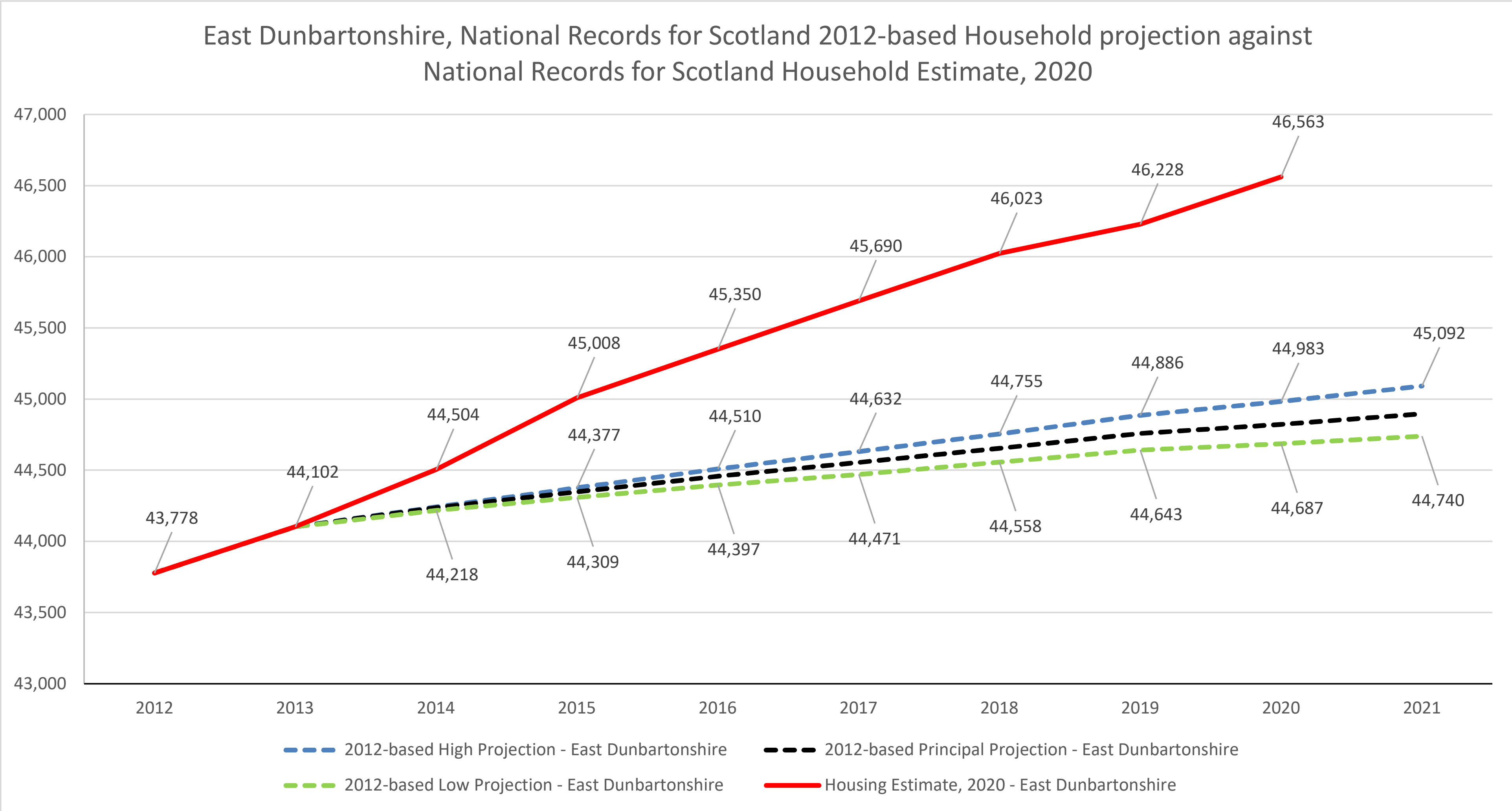
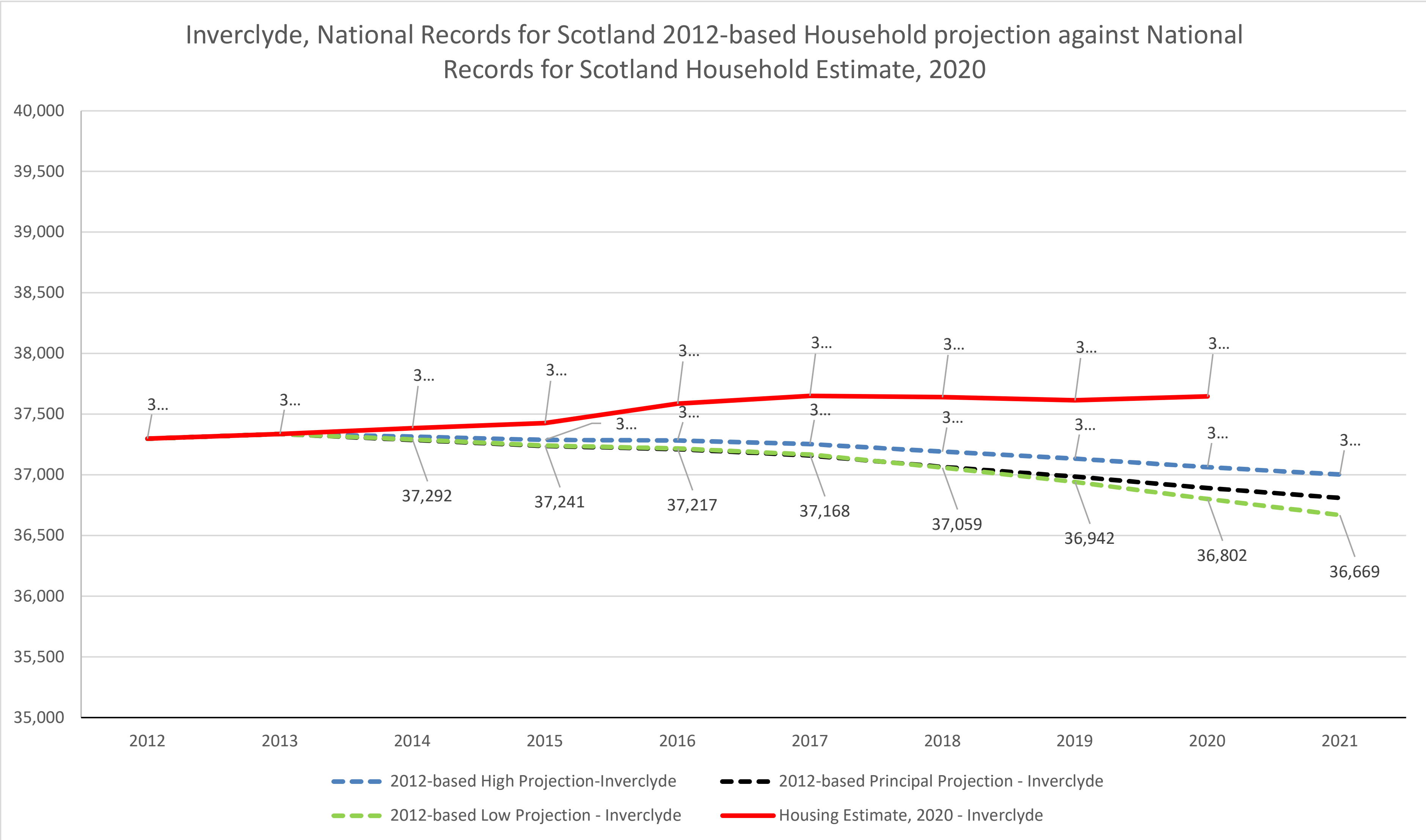


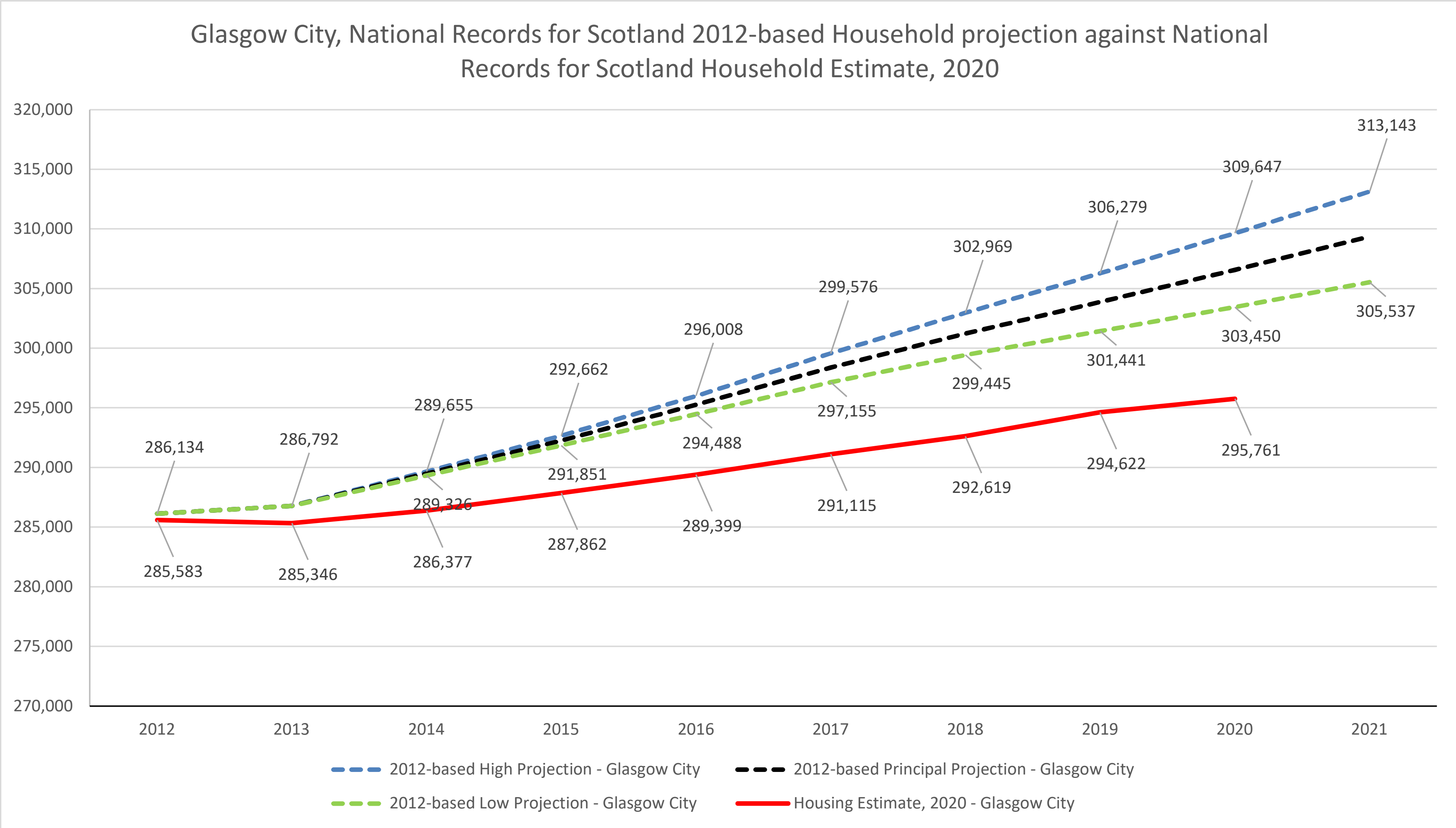
Figure 1.2, Glasgow City Region Local Authorities – National Records of Scotland 2012-based Household projection v National Records of Scotland Household Estimate, 2020

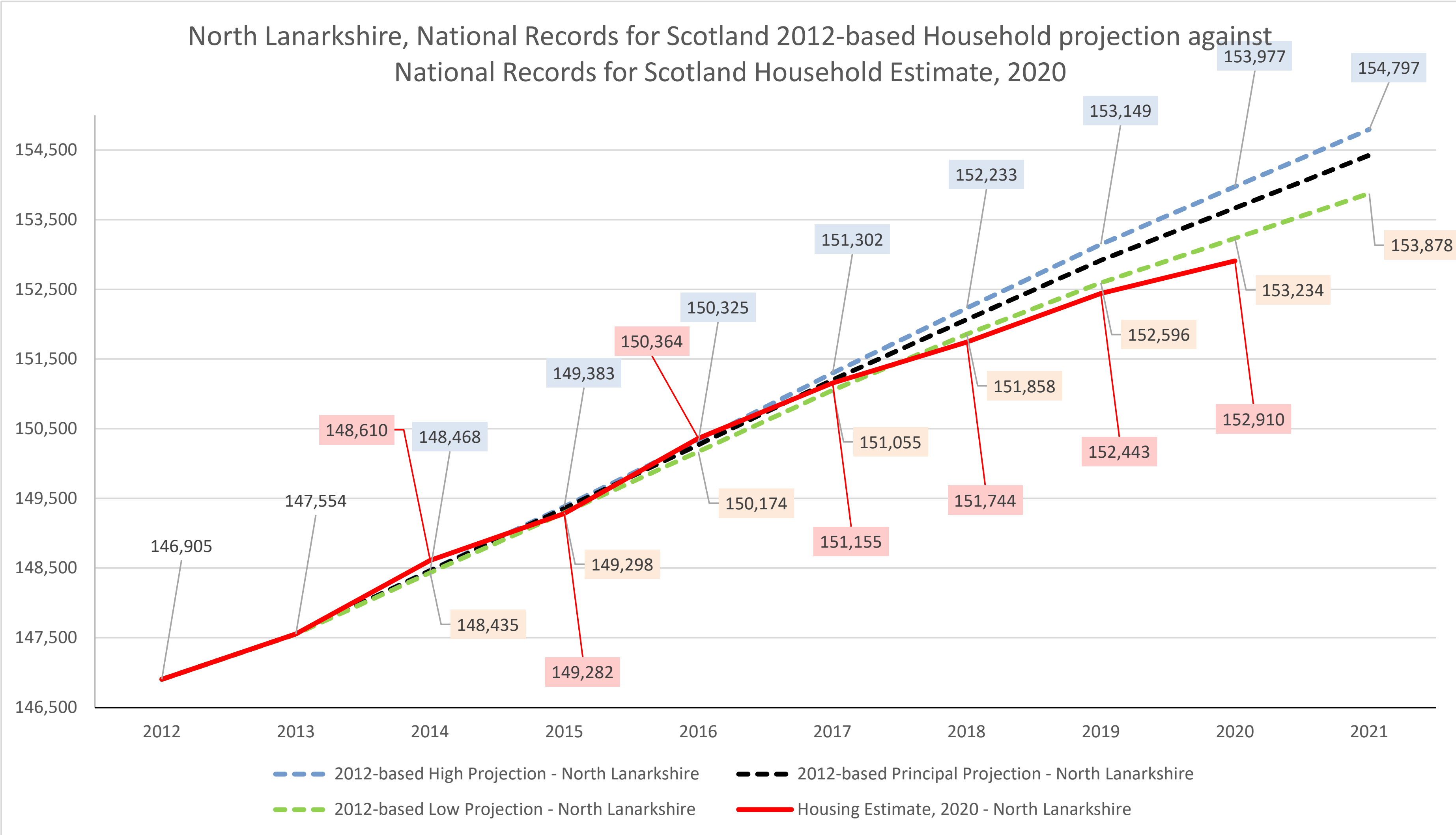


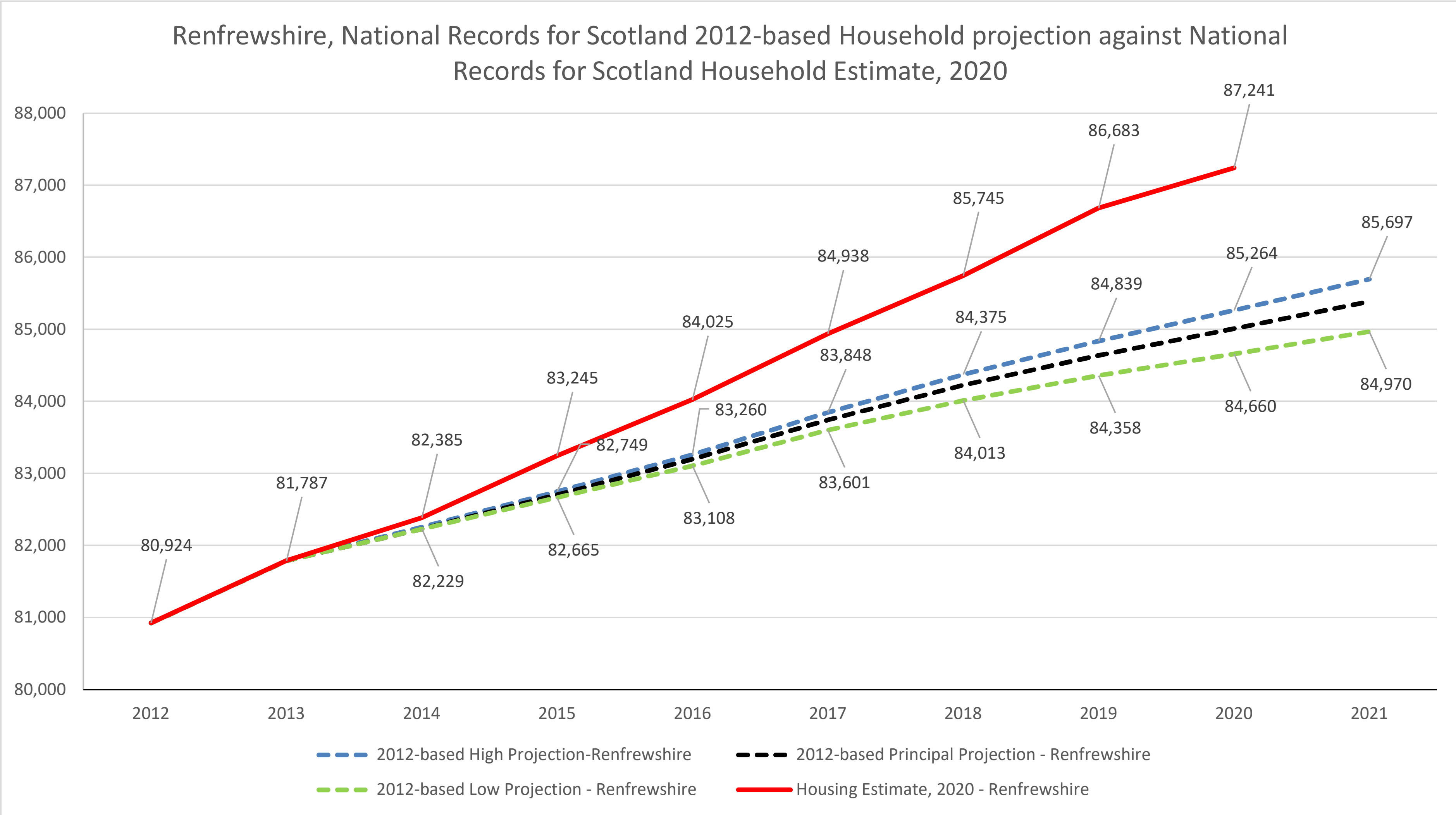

East Dunbartonshire, National Records for Scotland 2012-based Household projection against National Records for Scotland Household Estimate, 2020
47,000
46,500
46,000
45,500
45,000
44,500
44,000
43,500
43,000
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
43,778
44,102
44,504
45,008
45,350
45,690
46,023
46,228
46,563
44,377
44,510
44,632
44,755
44,886
44,983
45,092
44,218
44,309
44,397
44,471
44,558
44,643
44,687
44,740
2012-based High Projection - East Dunbartonshire
2012-based Principal Projection - East Dunbartonshire
2012-based Low Projection - East Dunbartonshire
Housing Estimate, 2020 - East Dunbartonshire

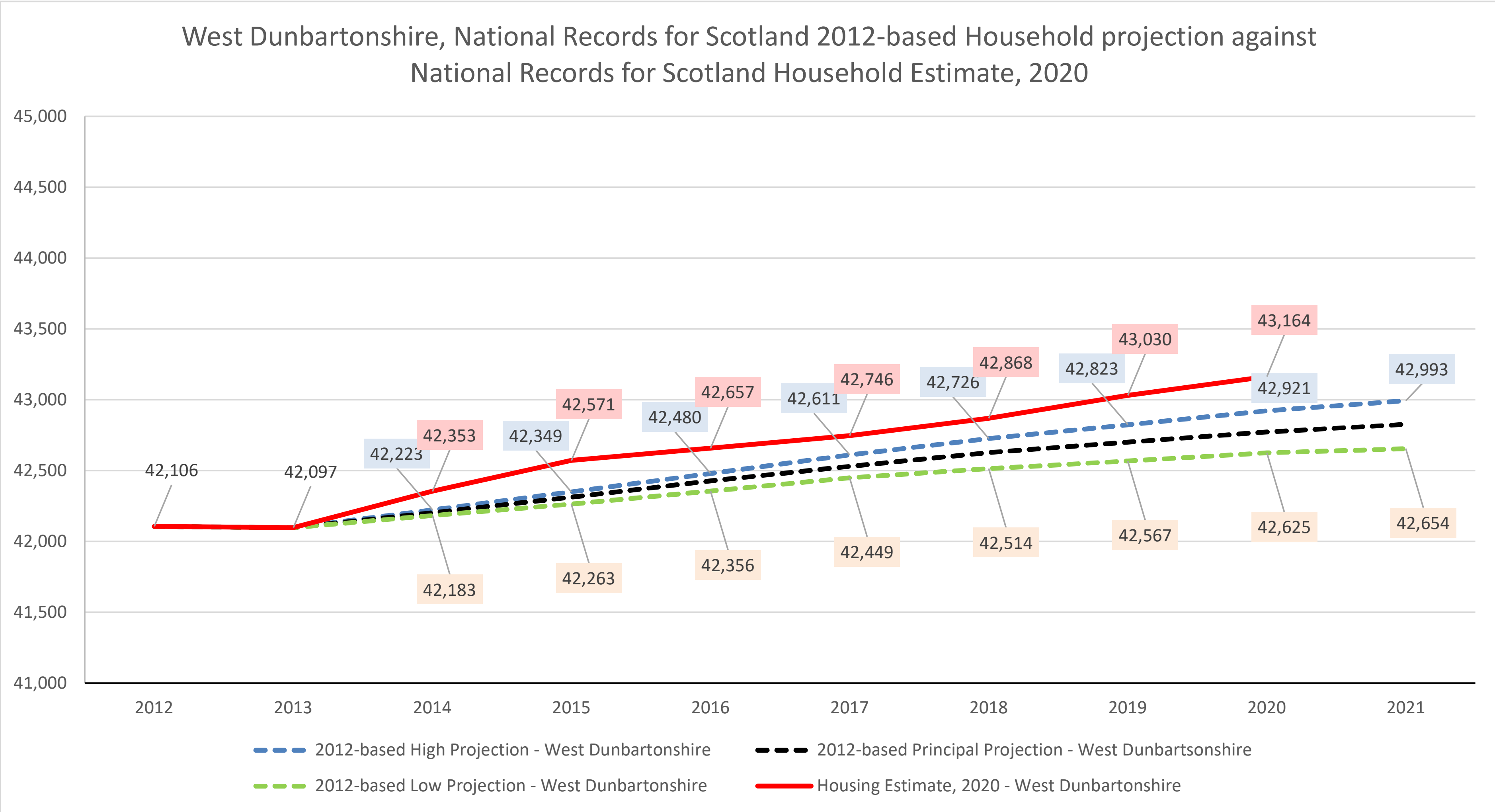


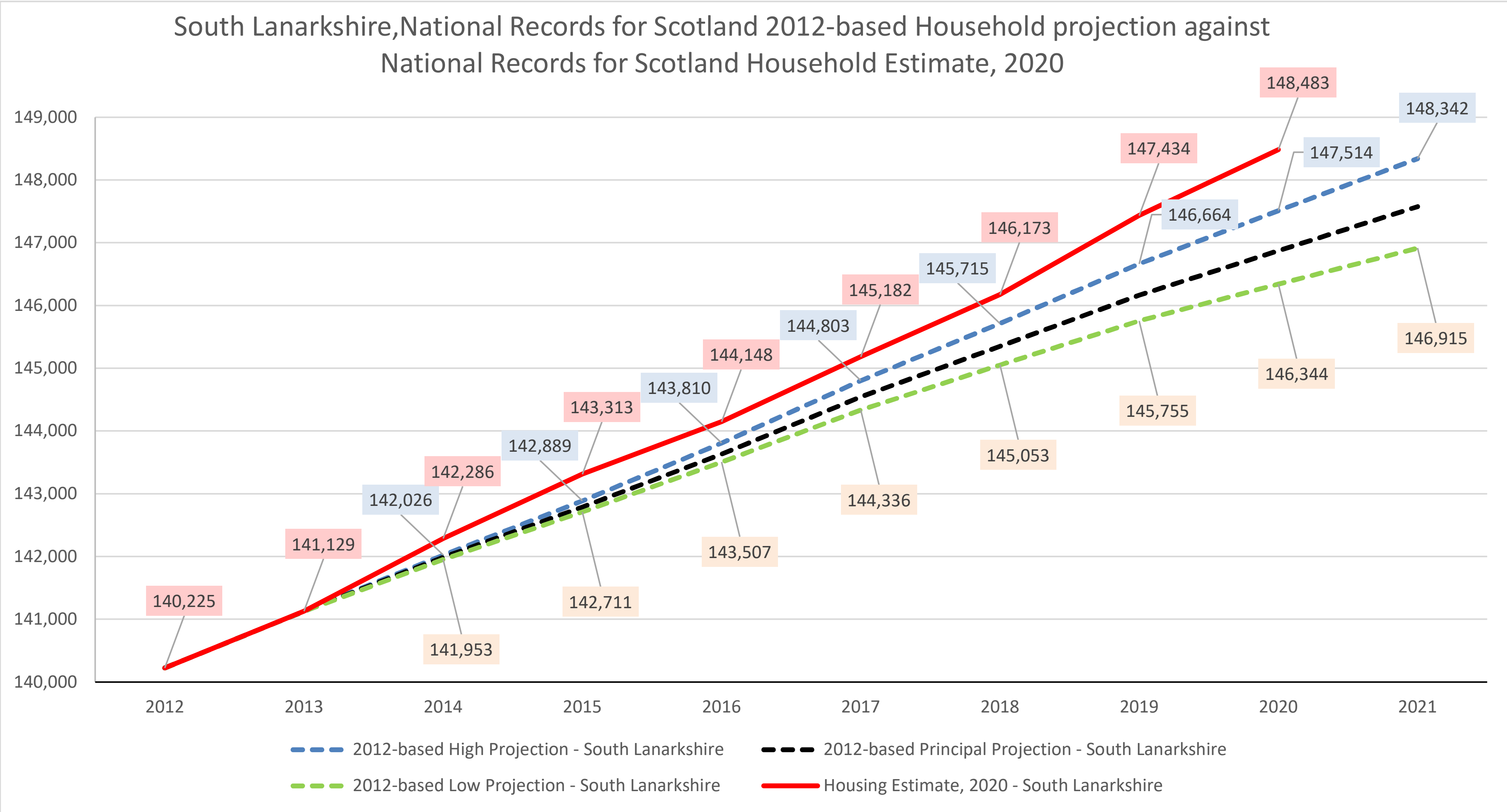
Inverclyde, National Records for Scotland 2012-based Household projection against National Records for Scotland Household Estimate, 2020
40,000
39,500
39,000
38,500
38,000
37,500
37,000
36,500
36,000
35,500
35,000
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
37,292
37,241
37,217
37,168
37,059
36,942
36,802
36,669
2012-based High Projection-Inverclyde
2012-based Principal Projection - Inverclyde
2012-based Low Projection - Inverclyde
Housing Estimate, 2020 - Inverclyde


Glasgow City, National Records for Scotland 2012-based Household projection against National Records for Scotland Household Estimate, 2020
320,000
315,000
310,000
305,000
300,000
295,000
290,000
285,000
280,000
275,000
270,000
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
286,134
286,792
289,655
292,662
296,008
299,576
302,969
306,279
309,647
313,143
289,326
291,851
294,488
297,155
299,445
301,441
303,450
305,537
285,583
285,346
286,377
287,862
289,399
291,115
292,619
294,622
295,761
2012-based High Projection - Glasgow City
2012-based Principal Projection - Glasgow City
2012-based Low Projection - Glasgow City
Housing Estimate, 2020 - Glasgow City


North Lanarkshire, National Records for Scotland 2012-based Household projection against National Records for Scotland Household Estimate, 2020
154,500
153,500
152,500
151,500
150,500
149,500
148,500
147,500
146,500
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
146,905
147,554
148,610
148,468
148,435
149,383
149,298
149,282
150,364
150,325
150,174
151,302
151,055
151,155
152,233
151,858
151,744
153,149
152,596
152,443
153,977
153,234
152,910
154,797
153,878
2012-based High Projection - North Lanarkshire
2012-based Principal Projection - North Lanarkshire
2012-based Low Projection - North Lanarkshire
Housing Estimate, 2020 - North Lanarkshire


Renfrewshire, National Records for Scotland 2012-based Household projection against National Records for Scotland Household Estimate, 2020
88,000
87,000
86,000
85,000
84,000
83,000
82,000
81,000
80,000
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
80,924
81,787
82,385
82,229
83,245
82,749
82,665
84,025
83,260
83,108
84,938
83,848
83,601
85,745
84,375
84,013
86,683
84,839
84,358
87,241
85,264
84,660
85,697
84,970
2012-based High Projection-Renfrewshire
2012-based Principal Projection - Renfrewshire
2012-based Low Projection - Renfrewshire
Housing Estimate, 2020 - Renfrewshire


West Dunbartonshire, National Records for Scotland 2012-based Household projection against National Records for Scotland Household Estimate, 2020
45,000
44,500
44,000
43,500
43,000
42,500
42,000
41,500
41,000
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
42,106
42,097
42,223
42,353
42,183
42,349
42,571
42,263
42,480
42,657
42,356
42,611
42,746
42,449
42,726
42,868
42,514
42,823
43,030
42,567
43,164
42,921
42,625
42,993
42,654
2012-based High Projection - West Dunbartonshire
2012-based Principal Projection - West Dunbartsonshire
2012-based Low Projection - West Dunbartonshire
Housing Estimate, 2020 - West Dunbartonshire


South Lanarkshire,National Records for Scotland 2012-based Household projection against National Records for Scotland Household Estimate, 2020
149,000
148,000
147,000
146,000
145,000
144,000
143,000
142,000
141,000
140,000
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
140,225
141,129
142,286
143,313
144,148
145,182
146,173
147,434
148,483
142,026
142,889
143,810
144,803
145,715
146,664
147,514
148,342
141,953
142,711
143,507
144,336
145,053
145,755
146,344
146,915
2012-based High Projection - South Lanarkshire
2012-based Principal Projection - South Lanarkshire
2012-based Low Projection - South Lanarkshire
Housing Estimate, 2020 - South Lanarkshire

1.4 Glasgow City performed below the projection with its 2020 housing estimate around 11,000 lower than the low migration scenario. This scale of deficit in the household formation estimate compared with the National Records of Scotland projections, adds to the case for significant interventions to support housing delivery in locations where market delivery is failing. Note, as the largest authority, the scale of the deficit in Glasgow drives the statistical picture for the Glasgow City Region overall.

1.5 North Lanarkshire Council's housing estimate was also below the low migration projection at 2020. In every other case however, the six other authorities' household estimate were above the high migration variant household projections.

1.6 Notable is that the projected decline in Inverclyde did not happen and West Dunbartonshire (which is now projected to decline) also performed above the high migration scenario.

1.7 These findings confirm the National Records of Scotland statement that the household projections are not policy-based forecasts of what the Government expects to happen and also place a question mark over their use at the lower geographical scale of the local authority.

Further Note on Completions

1.8 At the Scottish Government's feedback meeting on the 18th August 2021, the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan's uses of Housing Land Audit completions was queried by Scottish Government officers.

1.9 The standards to which the Clydeplan Authorities collate the housing land audit data are included in the embedded file within this response, and have resulted in a rigorous and consistent approach to data collection over many years. The approach adopted in the Glasgow City Region has been to base calculation of completions on housing land audits with the arguments around such matters set out most recently, and fairly fully within the North Lanarkshire and West Dunbartonshire Local Development Plan Examination Reports.

- https://www.dpea.scotland.gov.uk/NLC
- https://www.dpea.scotland.gov.uk/WDC

1.10 The primary limitation of the audit is that the survey records completions only on sites of 4 or more units. The Housing Market Partner Strategic Housing Investment Plan wish to confirm that it is content to rely upon the Housing Land Audit data, over NB2 (New Build) returns which in some authorities have been demonstrated to contain a level of error.

1.11 **Conclusion on Household Projections**

Senior Officer Indicative and Conditional Response on Household Projections
Within this updated response, the authorities of the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan have utilised the National Records of Scotland Principal 2018-based Household Projection to develop draft Housing Estimates. The Glasgow City Region Housing Market Partner Strategic Housing Investment Plan will provide an updated view on the Household Projections, Existing Need and therefore Housing Estimates, following conclusion of its Housing Need and Demand Assessment 3, which will be undertaken as soon as practicable to inform preparation of National Planning Framework 4. On publication of draft National Planning Framework 4 a politically endorsed consultation response will be provided with a firmer view of the Housing Estimates and Minimum All Tenure Housing Land Requirement.

2. Appendix Part 2 - Existing Housing Needs

2.1 By way of clarification, the alternative numbers presented in the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan response of 17th June 2021, are not intended as a definitive approach to be applied but are there to provide an example of an alternative approach for estimating the scale of existing need relevant to homelessness.

2.2 The Glasgow City Region Housing Market Partner Strategic Housing Investment Plan wishes to re-emphasise the specific requirement within Housing Need and Demand Assessment guidance in relation to existing need which is to identify existing need that can only be met through the provision of an *additional* unit of housing as distinct from existing need that can be met in situ within existing stock, stock turnover, and stock improvements. The Glasgow City Region Housing Market Partner Strategic Housing Investment Plan place a fundamental question over why the National Record for Scotland household projections, which project household formation, do not include these households if it ultimately expects them to form.

2.3 Additional evidence has been brought to the attention of the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan from Homes for Scotland in a draft report Existing Housing Need in the Clydeplan area - Survey Results by The Diffley Partner Strategic Housing Investment Plan and Rettie & Co, May 2021. The Housing Market Partner Strategic Housing Investment Plan is currently considering this work and is undertaking additional work on stock profile, pressures and management issues and specialist provision. This will enable the Housing Market Partner Strategic Housing Investment Plan to provide an updated view of the net need for a new house within the Housing Need and Demand Assessment Tool estimation process.

2.4 In the meantime, the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan wishes to confirm that, whilst there are concerns around the extent to which existing need that results in a new home is already captured within the National Records of Scotland Household Projections, along with concerns about the time passage from the 2011 census, it is content to inform draft National Planning Framework 4 to accept the Housing Need and Demand Assessment Homeless in Temporary Accommodation, Overcrowded and Concealed method based on Scottish Government homelessness statistics (a count of homeless households in temporary accommodation) and a combination of the Scottish 2011 Census (a count of households both overcrowded and concealed). This will be reviewed as the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Housing Need and Demand Assessment 3 progresses.

2.5 Conclusion on Existing Need

Senior Officer Indicative and Conditional Response on Existing Need
The Glasgow City Region Housing Market Partner Strategic Housing Investment Plan wishes to confirm that, whilst there are concerns around the default Existing Need inputs (see Part 2), to inform draft National Planning Framework 4 it is content to accept the Homeless in Temporary Accommodation, Overcrowded and Concealed method for all the Local Authorities at this stage. This will be reviewed as the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Housing Need and Demand Assessment 3 progresses and on publication of draft National Planning Framework 4, a politically endorsed consultation response will be provided with a firmer view of Existing Need, Housing Estimates and the Minimum All Tenure Housing Land Requirement.

3. Appendix Part 3 - Flexibility Allowance

3.1 Whilst published online, and copied to some other stakeholders, the Minimum All Tenure Housing Land Requirement housing numbers has essentially been an internal consultation between Scottish Government and the Local Authorities thus far. The view of the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan is that the blanket application of 25% flexibility as well as the setting of minimum land requirements, is inappropriate especially in areas of pressured market demand and where there are environmental and other constraints. The application of additional flexibility in such areas will undermine the Strategic Development Plan and Indicative Regional Spatial Strategy to deliver a compact city model. Evidence of the flight to green field over brownfield is provided in the 2019 Housing Land Audit analysis which demonstrates that whilst, large amounts of brownfield land exists in the Glasgow City Region, since the Global Financial Recession urban brownfield delivery has declined as the proportion of greenfield delivery has increased.

3.2 There is no evidence that additional flexibility in the provision of land will assist delivery in those areas where there are market failures. The Government consultation in the Housing General Paper from 2020 stated that, “there is no definitive evidence establishing a causal link between national planning policy and completion rates.” Additionally, flexibility within the land supply is irrelevant to the principle mechanism for the delivery of affordable housing which will continue to be the availability and allocation of public funding. Actions required to support market failures in the private sector include positive interventions to shore up delivery and in some areas where demand is strong but where there are environmental and infrastructure limitations, restraint is required rather than flexibility.

3.3 Flexibility is already built into the Housing Estimation process and the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan have calculated that from the raw Household Projections to the final Land Requirements, an additional 60% has been added ***including additions made by the local authorities.*** (See embedded worksheet at paragraph “Mobile Demand Process”, Tab 4 “Highlighting Flexibility”).

3.4 Both of these aspects of potential policy, the setting of minimums and the addition of 25% flexibility, have not been evidenced, justified, appraised, consulted upon, or endorsed by Parliament and in the Glasgow City Region area it is likely that these concerns will follow through to the politically endorsed responses at regional and local authority levels following publication of Draft National Planning Framework 4.

3.5 The Glasgow City Region Housing Market Partner Strategic Housing Investment Plan therefore wishes to state its ongoing concerns around the setting of minimum targets and the application of 25% flexibility, and in particular in locations such as East Renfrewshire and East Dunbartonshire, where the over allocation of land will undermine the spatial strategy of the Strategic Development Plan, Indicative Regional Spatial Strategy and Local Development Plans of the Glasgow City Region. As stated in our first response to this consultation, a preferred option would be that a single Minimum All Tenure Housing Land Requirement figure is set for the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan with the option to distribute that figure including any required flexibility, between authorities. However, the desire by government to establish a consistent approach is understood and therefore to assist the Scottish Government in progressing draft National Planning Framework 4, the addition of Flexibility is presented.

3.6 Going forwards the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan would strongly recommend that locally appropriate land allocations and interventions should be established through the Local Development Plans and Local Housing Strategies, to meet housing need and demand within each local authority area having regard to the National Planning Framework 4 and Regional Spatial Strategies particularly in respect of regional planning objectives.

3.7 **Conclusion on Flexibility**

Senior Officer Indicative and Conditional Response on Flexibility
The Partner Strategic Housing Investment Plan has ongoing concerns regarding the blanket and arbitrary application of 25% Flexibility and the setting of minimum land requirements which in some circumstances, will constrain more appropriate locally appropriate approaches. However, in order to support the Government in progressing to Draft National Planning Framework 4 stage, Flexibility has been presented. On publication of draft National Planning Framework 4 a politically endorsed consultation response will be provided with detailed comments on the proposed Land Requirements.

Part 3 Additional Evidence

3.8 Private sector completions declined significantly following the global financial recession and have not returned to anything near pre-2007 levels. This is particularly marked in private sector brownfield delivery which has recovered but only to around half of its contribution pre recession. Private greenfield delivery has recovered and now represents a much higher proportion of delivery than prior to the global financial recession. These trends place an ongoing risk around delivery of the compact city model.

3.9 Social brownfield delivery increased significantly in 2019 and in general, brownfield represents a much higher proportion of social delivery than greenfield averaging around 90/10.Further improvements in social delivery are anticipated driven by the More Homes Scotland funding with peak delivery expected between 2020 and 2022.

(See Figures 3.1-3.3)

Figure 3.1, Private Sector Completions (Long Term)

Figure 3.2, Completions and Programming by Tenure and Land Type

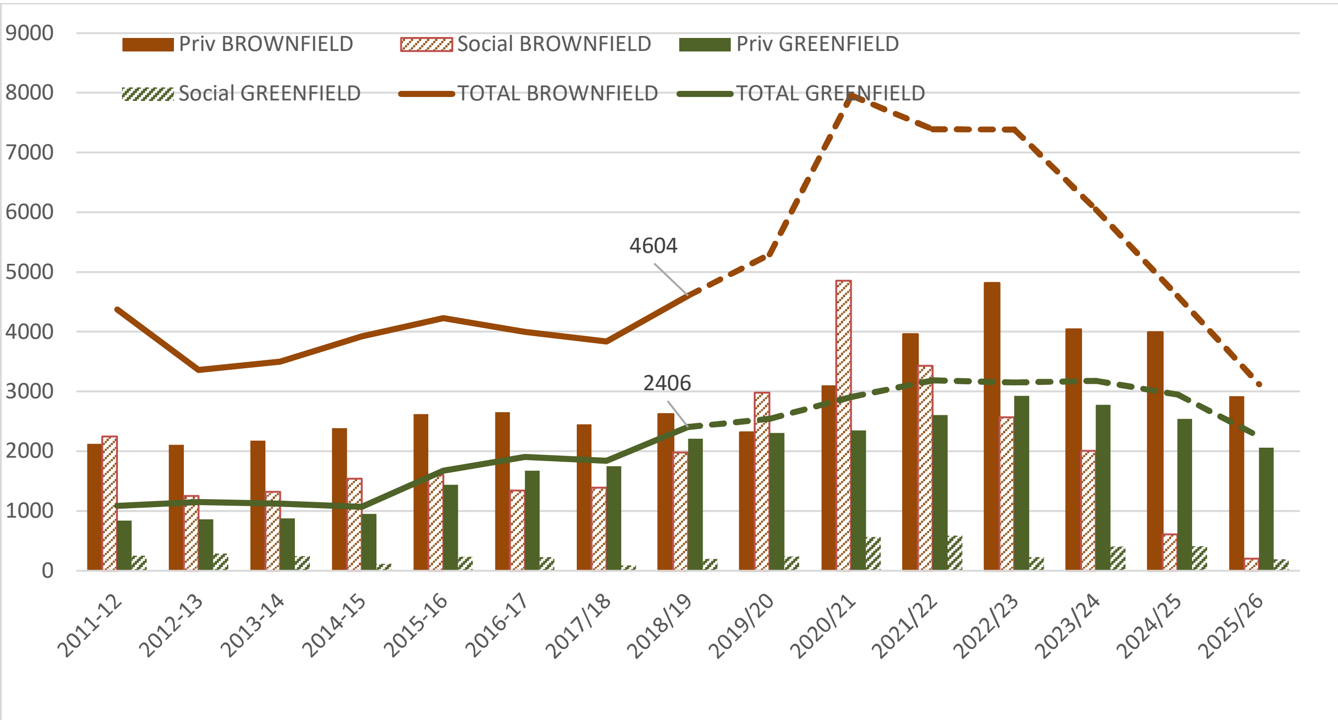
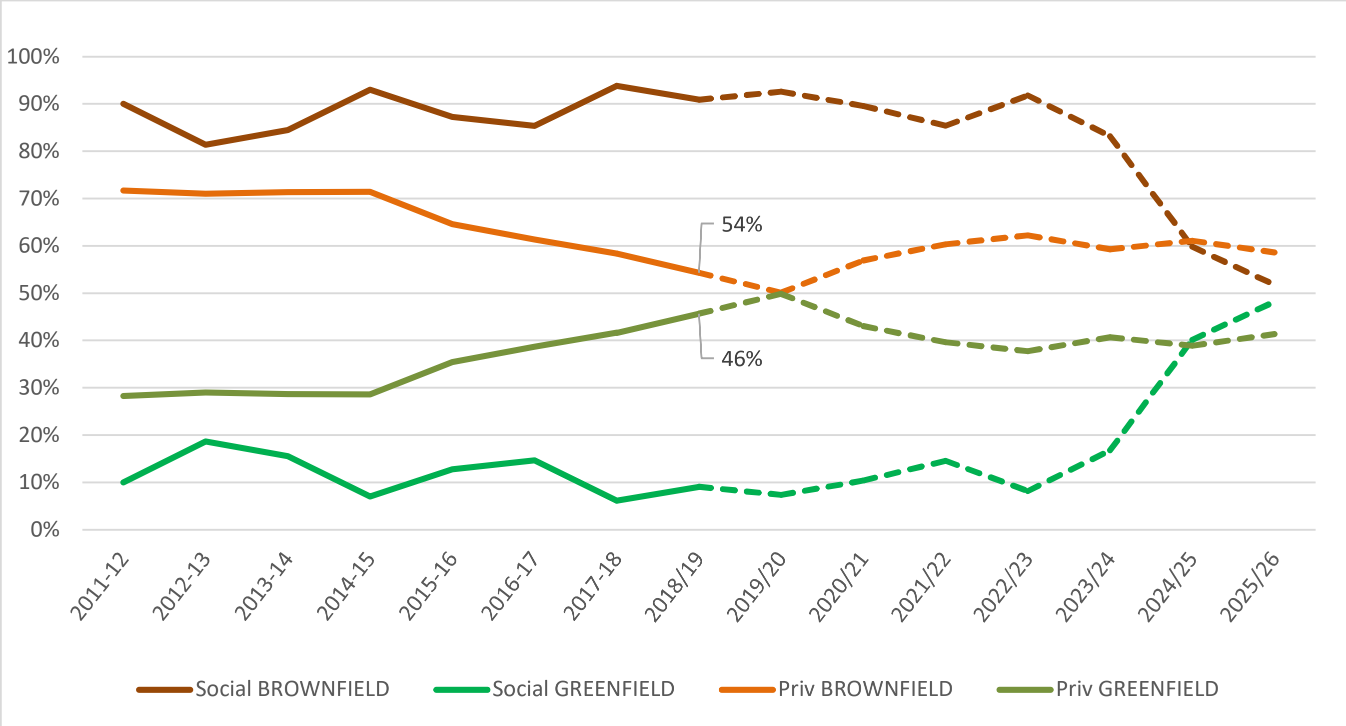


Figure 3.3, Relative Percentage Completions and Programming by Tenure and Brownfield/Greenfield

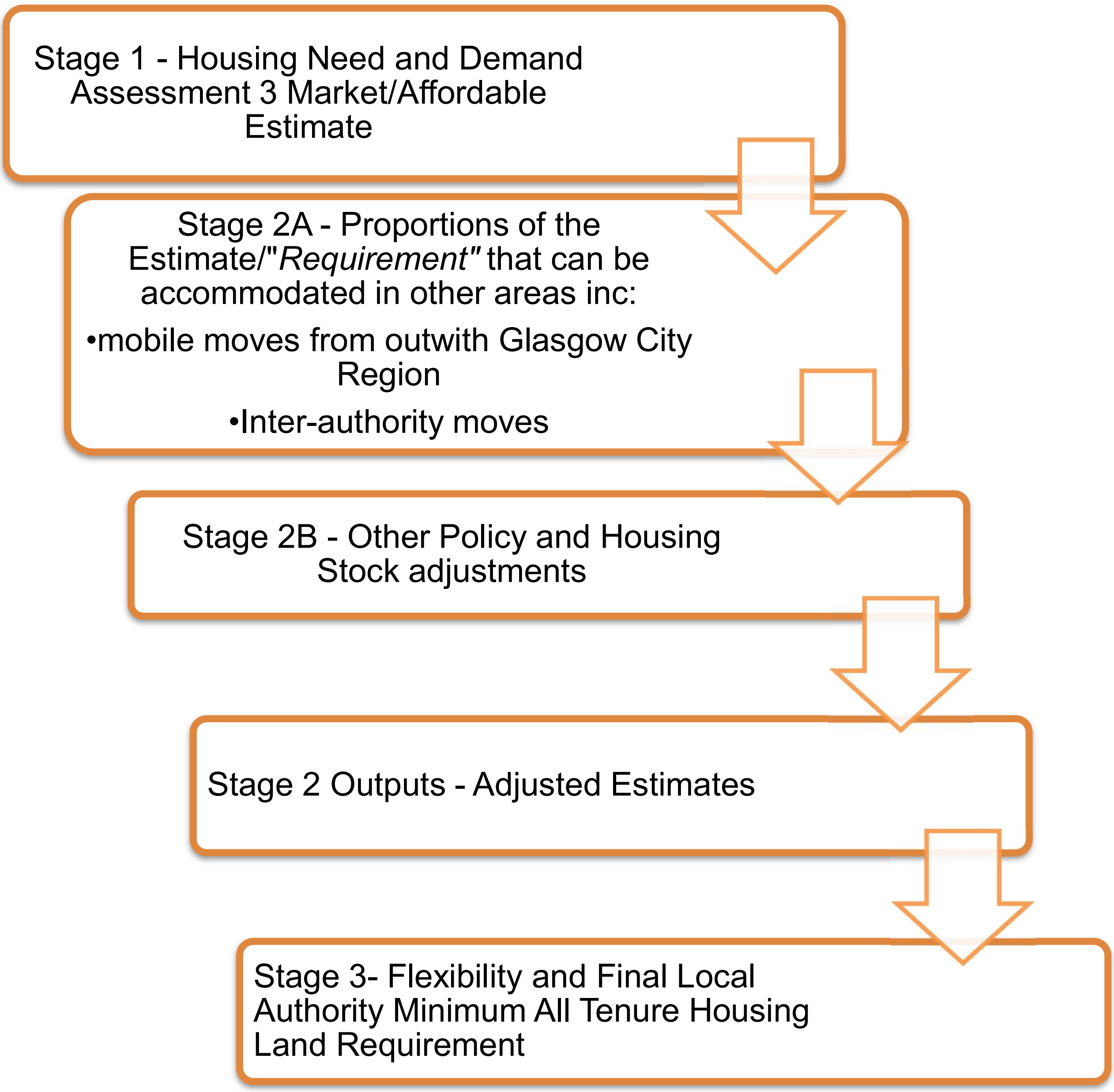


4. Appendix Part 4 - Indicative and Conditional View of Initial Default Minimum All Tenure Housing Land Requirement

4.1 Further to the original response, the Glasgow City Region Housing Market Partnership has utilised the Housing Need and Demand Assessment Tool to produce default tenured Housing Estimates enabling the private sector element to be adjusted for mobile demand. The impact of planning and policy assumptions at this time, have also been taken into account and applied to the National Records for Scotland projections. The tenure balance set out may alter as the Housing Need and Demand Assessment, Local Housing Strategy and Local Development Plans are further developed.

4.2 The process that has been undertaken is similar to that for Housing Need and Demand Assessment 2 and the Beyond the Housing Need and Demand Assessment stage to set Housing Supply Targets as described in the Housing Need and Demand Assessment Managers Guide (December 2020) and is represented in the following diagram.

Figure 4.1, Minimum All Tenure Housing Land Requirement Process



Stage 1 – Housing Need and Demand Assessment 3 Market/Affordable Estimate

4.3 Using the Housing Need and Demand Assessment Tool, draft estimates have been prepared using the same defaults used by Government for the 20 year period required for Housing Need and Demand Assessment purposes and replicated for the 15 year period used as part of the Minimum All Tenure Housing Land Requirement process. These results are then annualised into 10 year averages to replicate the Minimum All Tenure Housing Land Requirement Process and using the Housing Need and Demand Assessment Tool, results have been produced split into market and affordable sectors with results as set out within the embedded spreadsheet at 4.5 below.

4.4 If using the Housing Need and Demand Assessment outputs which cover a 20 year period, the 10 year average estimate is lower than if using the Minimum All Tenure Housing Land Requirement process which uses a 10 year average of a fifteen year period 2022-37.

Stage 2A- Private Sector Mobile Demand Adjustments

4.5 In order to replicate the way private sector mobile demand operates across the regional Housing Market Area, past patterns of moves using house sales data for the 5 year period of 2013 -2017, has been used. The element of house movers considered to be mobile, i.e. moves from outwith the Glasgow City Region and inter authority moves, has been calculated and apportioned based on the total available land supply. The approach to this is set out in the embedded Excel file. “Mobile Demand Process”.

Stage 2B - Other Policy and Housing Stock adjustments

4.6 Other housing stock and policy on considerations have then been applied using a template based approach similar to that used for the setting of Housing Supply Targets and taking account of issues such as major planned social build or demolitions, and policy ambitions such as growth and restraint.

Results

4.7 The results are summarised in Summary Table 4.2 below and the detailed rationale for each local authority approach is set out in the individual local authority templates as follows.

4.8 **Conclusion on Minimum All Tenure Housing Land Requirements**

4.9 As described in the foregoing response at Part 3 on Flexibility, the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan have ongoing concerns about the blanket application of 25% flexibility and the use of minimums in National Planning Framework 4. To enable progress towards publication of draft National Planning Framework 4, adjusted housing estimates, which take account of the apportionment of mobile demand, have been provided and the suggested default 25% flexibility has been presented.

Senior Officer Indicative and Conditional Response on Minimum All Tenure Housing Land Requirements

The Partner Strategic Housing Investment Plan has developed a view of Housing Estimates adjusted to take account of how private sector mobile demand operates across the Glasgow City Region Housing Market Area and Flexibility has been presented. This response is conditional on conclusion of the Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Housing Need and Demand Assessment 3 and publication of draft National Planning Framework 4 when a politically endorsed consultation response will be provided with a firmer view of the Housing Estimates and Land Requirements.

Summary Table 4.2:
Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Senior Officer Indicative and Conditional View of Initial Default Minimum All Tenure Housing Land Requirement

	SCOTTISH GOVERNMENT DEFAULTS			Glasgow City Region Housing Market Partner Strategic Housing Investment Plan Indicative and Conditional INITIAL VIEW			
	Stage 1			Stage 2A	Stage 2B	Stage 3	
Local Authority	**Housing Estimate - Existing Housing Need plus Newly Forming Households**	**Flexibility 25%**	**Minimum All Tenure Housing Land Requirement**	**Adjusted Housing Estimate (Mobile demand adjustments applied) ***	**Local Adjusted Housing Estimate (Policy Adjustments)**	**Flexibility ****	**Indicative and Conditional Minimum All Tenure Housing Land Requirement (rounded)**
East Dunbartonshire	2,550	650	3,200	2,013	2,013	25%	2,500
East Renfrewshire	3,250	800	4,050	2,254	2,254	25%	2,800
Glasgow City	17,150	4,300	21,450	17,070	17,070	25%	21,350
Inverclyde	200	50	250	557	1,200	25%	1500
North Lanarkshire	5,050	1,250	6,300	5,897	5,897	25%	7,350
Renfrewshire	3,900	1,000	4,900	3,913	3,913	25%	**4,900**
South Lanarkshire	6,250	1,550	7,800	6,291	6,291	25%	**7,850**
West Dunbartonshire	350	100	450	715	1,680	25%	2,100
Glasgow City Region	**38,700**	**9,700**	**48,400**	38,710	40,319		**50,350**
Notes:				*** (See Part 4)**		**** (See Part 3**	

EAST DUNBARTONSHIRE COUNCIL			**ALL TENURE**
Stage 1 Housing Need and Demand Assessment 3 10 year Housing Estimate		**Source: Housing Need and Demand Assessment 3 Tool Estimates**	2,567
		BEYOND THE HOUSING NEED AND DEMAND ASSESSMENT - Minimum All Tenure Housing Land Requirement ESTIMATE	
Factors	**Description**	**Evidence**	**Impact on Housing Need and Demand Assessment 3 Estimate (+/-/=)**
Stage 2A - Housing Need and Demand Assessment 3 (Housing Estimate Adjusted for Mobile Demand		• See above	2,013
Stage 2B ***Judgement-based factors***	**1.** economic factors which may impact on demand and supply	• Economic Development Strategy 2017 (EDS) vision of ensuring that "East Dunbartonshire has a sustainable and resilient economy with busy town and village centres, a growing business base, and is an attractive place in which to visit and invest" • Economic Recovery Plan March 2021 (ERP) - updates the Economic Development Strategy continues the vision but is tailored to responding to specific impacts caused by the Covid-19 pandemic. Actions in the Economic Recovery Plan contribute to at least one of the key priority areas: Business, People, Community and/ or Environment. • Interest in Economic Development Strategy from the housebuilding industry remains strong given the attractiveness of the area and higher than average incomes. • The Economic Development Strategy however seeks to rebalance the high levels of commuting out of the authority area for work (only 25% of residents work locally) to avoid the creation of unsustainable dormitory settlements. • The need to protect land suitable for new/extended business and employment uses, much of which is currently brownfield, from the pressure of other types of development such as housing. • The attractive environment is a key economic strength of the area and ensuring environmental sustainability is a key theme of the Economic Development Strategy and Economic Recovery Plan.	**=**
	2. capacity within the construction sector	• As the largest city region in Scotland and a significant driver of the Scottish Economy, any capacity issues in the construction sector, including in relation to materials and labour, are not likely to impact on long term delivery or on regional and local ambitions	**=**
	3. the potential inter-dependency between delivery of market and affordable housing at the local level	• There is a very strong, and strengthening, relation Strategic Housing Investment Plan between delivery of market and affordable housing in East Dunbartonshire, with East Dunbartonshire Council being highly dependent upon the housing market more generally to meet Local Housing Strategy objectives for delivery. • All sites of 10 units or greater in East Dunbartonshire Council are required to provide 25% affordable housing. • Of the affordable housing sites identified in the Strategic Housing Investment Plan (STRATEGIC HOUSING INVESTMENT PLAN) for development between 2021 and 2026, sites to be delivered as part of S75 agreements are far more likely to be developed within the period. • The availability of public sector owned land is likely to be highly restricted beyond the Strategic Housing Investment Plan period and will impact upon delivery further from 2026-2037. • The availability of market housing land impacts upon the ability to meet affordable housing needs and demands. High land values coupled together with the difficulties in accessing the private housing market for those on lower incomes, would justify the setting of a high percentage quota policy for affordable housing, such as 35% or 40%, in East Dunbartonshire however this is currently discouraged by Scottish Planning Policy.	**=**
	4. availability of resources (in particular to deliver social housing)	• Affordable housing is well resourced in East Dunbartonshire Council financially with demand from private and housing association sector partners to build here. • The grant funding regime will remain positive for the next 5 years at least and borrowing rates are at a historic low. • Land is a significant constraint, with very little Vacant and Derelict land and very few remaining Housing Revenue Account or Council owned sites in suitable locations. • The requirement of new infrastructure to support new development, along with rising standards and build cost are limiting factors.	**=**
	5. likely pace and scale of delivery based on completion rates	• Unlike many other localities, completion rates in East Dunbartonshire have been higher in the 2010's than before the Global Financial Recession. A major factor in this has been the redevelopment of the former Woodilee hospital which has been delivered jointly by 4 different developers pulling together for example in terms of delivering new infrastructure, marketing etc. • Recent high rates of house completions have to a large degree been driven by the spatial strategy of the Plan and development of brownfield land sites, including the former Woodilee and Lenzie Hospitals; land across the authority area which was surplus to education requirements; High Moss Bishopbriggs; Kilmardinny Bearsden, and numerous smaller sites. • Evidence since the completion of the Woodilee development is that although there are continued levels of interest from the housing development industry in the area recent completions/ programming indicate a slowing down in the pace of development. • The exceptionally high scale of development previously achieved through the successful reduction in brownfield land and rationalisation of public assets is unlikely to be capable of continuation due to land, infrastructure and environmental constraints.	**=**
	6. recent development levels	• Last 5 year All tenure Completions 1,593; 320 per annum • Last 10 year All Tenure completions 2,947; 295 per annum • Default 10 year Minimum All Tenure Housing Land Requirement 3,200; 320 per annum	**=**

		• As 5 above completions in East Dunbartonshire have been higher in the 2010's than prior to the Global Financial Recession and the recent successful regeneration of brownfield land in the area means that recent completion levels do not present a useful comparison on which to base future land allocations.	
	7. social factors	• East Dunbartonshire Council anticipates an ongoing and strengthening trend towards increased household formation, driven by an ageing population. • Over the period, increased demand is likely towards housing for older people – in particular for sheltered and retirement housing with services bought in. • Recent research suggested a desire by ageing residents for low-density housing such as bungalows, which would be difficult to deliver given the availability of land, preference by developers for 2-storey dwellings and other objectives of planning policy. It remains to be seen if the scale of demand could eventually lead to some private sector delivery of low-density housing. • The Council has commissioned research on Older Peoples and Specialist Housing as part of the Local Housing Strategy(LHS) and Local Development Plan 2(LOCAL DEVELOPMENT PLAN2) processes in conjunction with the Health and Social Care Partner Strategic Housing Investment Plan. It is anticipated that this work will particularly influence the approaches taken in the next Local Housing Strategy and Local Development Plan 3.	**=**
	8. environmental factors	• Meeting the default Minimum All Tenure Housing Land Requirement would likely come from large edge of settlement green belt release sites, away from local services and existing infrastructure, contrary to National Planning Framework 4 climate change, biodiversity, brownfield objectives and 20 mins neighbourhoods. • There are potential significant interacting impacts between providing land for development and the following: o Greenbelt functionality and the potential undermining of the city region strategy of maintaining a compact city region and reusing urban brownfield land. o Greenbelt defensibility and the coalescence of settlements. o Significant historic environment designations including Antonine Wall World Heritage Site and Buffer Zone, Forth & Clyde Canal and other Scheduled Ancient Monuments, Listed Buildings and their settings, Conservation Areas and Nationally or Locally Important Garden and Designed Landscapes. o Landscape setting and impact upon the Campsie Fells, Kilpatrick Hills and Craigmaddie/ Blairskaith. o Significant natural environment designations including Sites of Significant Scientific Importance, Local Nature Reserves and Local Nature Conversation Sites. o River Kelvin Flood Plain and flood risk areas o Soil quality protection including areas of deep peat, other carbon rich soils and prime agricultural land. o Loss of important open space within urban areas. o Hazardous installations and their buffer zones including high-pressure gas pipelines, a chlorine storage area and bonded warehouses. • The contribution from vacant and derelict sites and future residential opportunities in town centres is likely to be low. • Evidence for the above is provided in Local Development Plan 2 supporting documents MS Appendix 4 Housing Background Report and Appendix 8 Site Assessments.	**=**
Stage 2B Stock Projection factors	**9.** Planned demolitions	• Nithsdale Crescent only demolition planned at present (small scale). • However there are likely to be some further buildings under consideration over the National Planning Framework period – resulting from the review of the Local Housing Strategy.	**=**
	10. Housing brought back into effective use	• There are generally very few empty homes in East Dunbartonshire however the scale and potential for being housing back into use, albeit likely to be limited, should be assessed through review of Local Housing Strategy. • Consideration of any options to increase affordable housing within the urban area is required.	**=**
11. Spatial Strategy Considerations (Regional Spatial Strategy and Local Development Plan)		Maintenance of the compact city region and ensuring the continued protection of the greenbelt whilst ensuring that local housing need is met.	**=**
12. Indicative and Conditional 10 year Adjusted Housing Estimate		• The default 10 year housing estimate cannot be utilised as it uses trend based rather than policy based projections. • A robust and credible housing estimate will be developed pending: o the continuing development of a fully evidenced housing estimate through Housing Need and Demand Assessment 3; o Housing Need and Demand Assessment 3 – consideration of housing market areas; o Local Development Plan 3 – consideration of appropriate housing sites given environmental and infrastructure constraints; Regional Spatial Strategy /Joint work with Glasgow City Region authorities to consider appropriate housing sites across the city region.	**=**
13. Flexibility		• See Appendix –Part 3 Flexibility Allowance • This has the potential to undermine the city region strategy of maintaining compact city region and focussing on regeneration of urban brownfield land by drawing mobile demand away from other parts of the city region and the relevant Housing Sub Market Area. • Therefore, and given the significant environmental constraints detailed above, the application of any level of flexibility is considered to be inappropriate in the East Dunbartonshire context. • The approach is not accepted by the Council but shown to aid the government in their considerations.	**25%**
14. Indicative and Conditional Adjusted 10 year Minimum All Tenure Housing Land Requirement (rounded)		• To enable the Scottish Government to progress with the development of National Planning Framework 4, an indicative and conditional Minimum All Tenure Housing Land Requirement is provided based on housing estimates and adjusted for mobile demand, but subject to the caveats provided by the Glasgow City Region Housing Market Partner Strategic Housing Investment Plans response.	**2,500**

EAST RENFRERWSHIRE COUNCIL			**ALL TENURE**
Stage 1 Housing Need and Demand Assessment 3 10 year Housing Estimate		**Source: Housing Need and Demand Assessment 3 Tool Estimates**	**3,242**
		BEYOND THE Housing Need and Demand Assessment - Minimum All Tenure Housing Land Requirement ESTIMATE	
Factors	**Description**	**Evidence**	**Impact on Housing Need and Demand Assessment 3 Estimate (+/-/=)**
Stage 2A - Housing Need and Demand Assessment 3 (Housing Estimate Adjusted for Mobile Demand		• **See above**	**2,254**
Stage 2B ***Judgement-based factors***	**1.** economic factors which may impact on demand and supply	• East Renfrewshire performs well in many key performance indicators including employment levels, income, housing and education (emerging Economic Development Strategy). • The attractive environment is a key economic strength of the area. • The Local Development Plan and emerging Economic Strategy are seeking to reduce out-commuting of the workforce by providing more skilled employment opportunities within the area and providing more affordable housing options for local people. • City Deal investment is bringing major economic benefits - additional economic growth may require additional housing options both private and affordable.	
	2. capacity within the construction sector	• As the largest city region in Scotland and a significant driver of the Scottish Economy, any capacity issues in the construction sector, including in relation to materials and labour, are not likely to impact on long term delivery or on regional and local ambitions.	
	3. the potential inter-dependency between delivery of market and affordable housing at the local level	• Reliance locally on private sites to deliver accessible/ adaptable affordable housing (via Affordable Housing Spatial Planning Guidance), due to low levels of Local Authority land owner Strategic Housing Investment Plan. All sites of 4 units or greater are required to provide 25% affordable housing. • Reliance on timing of developers build programme to deliver affordable units. • More certainty in recent years due to master plan developments progressing and a new Council House Build Programme. • Often smaller housing sites can be unsuitable for onsite delivery of affordable housing with commuted payments sought in lieu of onsite provision. However there can be a significant time lag between a commuted payment being secured and a suitable project being planned, and units delivered.	
	4. availability of resources (in particular to deliver social housing)	• Development contributions have been secured towards the cost of providing or improving infrastructure through the Development Contributions Spatial Planning Guidance. • Rising costs and land values may impact upon the viability of existing and future proposals and the level of planning obligations that proposals can support. Capital investment in infrastructure and development contributions also may not go as far due to these rising costs. • The level of resources required to deliver the Minimum All Tenure Housing Land Requirement and required new infrastructure would be significant and potentially unmanageable in the 10 year period. Particularly for East Renfrewshire would be the impact that this level of delivery would have on our existing education estate (much of which is already at capacity) and the number of new schools, early years and Additional Support Need facilities that would be required. When added together, the number and level of different infrastructure needs associated with this size of release could create viability issues. Health and care facilities are also under pressure. • The current Strategic Housing Investment Plan (2020- 2025) sets out a healthy potential programme, with a level of over programming built in. There remains uncertainty over the level of AFFORDABLE HOUSING SUPPLY PROGRAMME funding in future years to support all identified projects. The majority of available funding will go towards social rented. • Requirements for higher specifications such as energy and space standards are also likely to result in increased build costs and larger land requirements for affordable homes. Funding and commuted sums may not go as far due to these rising construction costs. • The Scottish Government should continue to develop mechanisms to accelerate investment in housing, and in particular affordable housing to help deliver on these requirements.	
	5. likely pace and scale of delivery based on completion rates	• Positive recent trends include an increase in completion rates and strong developer interest. • It is not clear whether any future sites would continue at this rate going forward, which may impact the planned Strategic Housing Investment Plan programme. • Effectiveness and delivery of sites included in the Local Development Plan up to 2031 and the Council new build programme demonstrated through the Housing Land Audit and Strategic Housing Investment Plan . • Significant master plan development opportunities identified through Local Development Plan 1 are still being built out as programmed through the Housing Land Audit. • Lead in times for larger sites with phased affordable housing delivery from Local Development Plan adoption to delivery on the ground can be substantial - this can be circa. 4-5 years or longer for larger, more complex sites which require significant upfront infrastructure and capital investment.	
	6. recent development levels	Recent house completions, as a comparison and check on consistency and credibility, are as follows: • Last 5 years All tenure completions – 1242 (249 per annum) Private 1044 (209 per annum) Affordable 198 (40 per annum) • Last 10 years completions – 2366 (237 per annum) Private: 1809 (181 per annum) Affordable 557 (56 per annum) • Default 10 year Minimum All Tenure Housing Land Requirement – 4050 (405 per annum)	

		• Minimum All Tenure Housing Land Requirement and the default Housing Estimate are both well above past 10 year completion levels (+168 per annum and +88 respectively). • East Renfrewshire Council completions 2010-19 (2366) is considerably lower than the completions figures that Scottish Government have indicated for ERC (2999) (27% lower). The Housing Land Audit is considered a more reliable source than NB2s (New Build) although it includes only sites of 4 or more units which may account for some of the difference. Time periods are also different. • The average number of affordable homes being delivered (2010-19) at 56 per annum is above the 45 per annum target included in the current Local Housing Strategy (2017-22). However given the lower rate over the past 5 years, it is viewed that this current target remains appropriate as a minimum target for the future Local Housing Strategy. Delivery does not always have to be from new build homes – other delivery mechanisms are available. The Council will continue to apply a flexible policy approach to the provision of affordable housing and seek to deliver a range of affordable housing tenure types to meet local housing need and demand. • Although the available land supply is currently just below the Minimum All Tenure Housing Land Requirement, completions remain significantly below these requirements. • 15 windfall sites with a capacity of 570 units have been added to the housing supply after gaining planning permission at an average of 57 units per annum during the 10 year period 2010 to 2019.	
	7. social factors	• Increasing older population and population of adults with Additional Support Needs who are also ageing - leads to an increasing demand on care services and appropriate housing with support is required for independent living. • House prices in the Eastwood area remain amongst the most expensive in Scotland - impact of on the affordability of housing for newly forming households and younger people. • Continuing pressures with regard to demographic change, welfare reform and stock pressures and of size and type in particular areas mean need for affordable housing will remain a high priority. • Stronger focus upon on climate change, health and placemaking objectives – use of local facilities – parks, shops, open spaces - improvements to air quality and the environment. 20 minute neighbourhoods - benefits of having everything within walking distance of home.	
	8. environmental factors	• Local Development Plan 2 promotes a brownfield first approach in the urban areas with a continued focus upon the availability of infrastructure and the deliverability of sites. • The environmental quality and sensitivity of the green belt poses a significant constraint to the capacity of the area to accommodate significant levels of development and will impact on what future requirements are achievable. • The Local Development Plan Strategic Environmental Assessment Environmental Report, various site assessments and Green Belt landscape character assessment were key in identifying opportunities for the Local Development Plan. • Contribution from vacant and derelict sites and future residential opportunities in town centres are estimated to be low. • Meeting the default Minimum All Tenure Housing Land Requirement will likely come from large edge of settlement green belt release sites, which are generally away from local services and existing infrastructure, contrary to National Planning Framework 4 climate change, biodiversity, brownfield objectives and 20 minute neighbourhoods. • Potential to undermine Clydeplan strategy of maintaining compact city region and focussing on regeneration of urban brownfield land. • Vital that existing master plan areas and infrastructure identified in the current Local Development Plan are prioritised before further land releases are considered for future Local Development Plans.	
Stage 2B Stock Projection factors	**9.** Planned demolitions	• To be assessed through review of Local Housing Strategy. Numbers are estimated to be low.	
	10. Housing brought back into effective use	• To be assessed through review of Local Housing Strategy. Numbers are estimated to be low.	
11. Spatial Strategy Considerations (REGIONAL SPATIAL STRATEGY and LOCAL DEVELOPMENT PLAN)		• Local Development Plan 2 promotes a brownfield first approach in the urban areas with a continued focus upon the availability of infrastructure and the deliverability of sites up to 2031 and beyond in line with the 'compact city' approach set out in Clydeplan. The Plan is focused on delivering sustainable and inclusive economic growth and a move towards a low carbon place and economy. • Central to the current and future Local Development Plans approach is the phased release of sites to make efficient use of existing infrastructure and ensure the coordinated delivery of new infrastructure and investment, including schools; green infrastructure; transport infrastructure; community and leisure facilities; and health and care facilities. • The need to continue to monitor the demand for education places and to bring forward a strategy that will fully address future education infrastructure requirements remains a key issue. The Council will address future education and residential needs in a long term, coordinated and planned way through Local Development Plan 3.	
12. Indicative and Conditional 10 year Adjusted Housing Estimate		• The tenure balance may alter as the Housing Need and Demand Assessment, Local Housing Strategy and Local Development Plans are further developed.	**2,254**
13. Flexibility		• 25% flexibility is considered to be inappropriate in high market areas such as ERC and has the potential to undermine the spatial strategy of Clydeplan, Regional Spatial Strategy and the aims of the National Planning Framework 4 Position Statement. However, in order to support the Government in progressing to Draft National Planning Framework 4 stage, flexibility has been presented.	**25%**
14. Indicative and Conditional Adjusted 10 year Minimum All Tenure Housing Land Requirement (rounded)		• An indicative and conditional Minimum All Tenure Housing Land Requirement is provided pending the development of a fully evidenced Housing Need and Demand Assessment 3. (rounded to nearest 50)	**2,800**

GLASGOW CITY COUNCIL			**ALL TENURE**
Stage 1 HOUSING NEED AND DEMAND ASSESSMENT 3 10 year Housing Estimate		**Source: HOUSING NEED AND DEMAND ASSESSMENT 3 Tool Estimates**	17,155
BEYOND THE HOUSING NEED AND DEMAND ASSESSMENT - MINIMUM ALL TENURE HOUSING LAND REQUIREMENT ESTIMATE			
Factors	**Description**	**Evidence**	**Impact on HOUSING NEED AND DEMAND ASSESSMENT 3 Estimate (+/-/=)**
Stage 2A - HOUSING NEED AND DEMAND ASSESSMENT 3 (Housing Estimate Adjusted for Mobile Demand			17,070
Stage 2B **Judgement-based factors**	**1.** economic factors which may impact on demand and supply	• Glasgow City Council and the city region have major infrastructure investment plans which will contribute towards increased net inward investment and catalyse further growth and new inward migration, unaccounted for within National Record for Scotland projections, including for example (not exhaustive): o City Centre Living Strategy and ambitions to double to population of the city centre; o Clyde Mission investment to transform land use within 500m of Clyde, including sites of strategic economic importance and increasing residential potential; o Glasgow City Region Metro - major transport infrastructure project aiming to transform the city and region to achieve a modal shift from private vehicle transport and decarbonise mass transit of people and goods.	
	2. capacity within the construction sector	• As the largest city region in Scotland and a significant driver of the Scottish Economy, any capacity issues in the construction sector, including in relation to materials and labour, are considered unlikely to negatively impact on delivery in the long term delivery or on regional and local ambitions. • Updating guidance for Affordable Housing Supply Programme to include requirements for greater use of modern methods of construction, including offsite delivery, to encourage shift towards lower and zero-carbon homes, has the potential to increase outputs at scale within the Affordable Housing Supply Programme and support increased delivery rates for mixed developments	
	3. the potential inter-dependency between delivery of market and affordable housing at the local level	• Glasgow has several strategic housing-led, mixed tenure, development opportunities where public investment will platform delivery of additional affordable and market housing: see strategic development framework areas including the major regeneration sites at Sighthill and North Glasgow, Clyde Waterfront and Clyde Gateway https://www.glasgow.gov.uk/index.aspx?articleid=20787	
	4. availability of resources (in particular to deliver social housing)	• Scottish Government have committed to deliver 100,000 additional affordable homes (2021-31) and budgeted for >£3billion grant funding over the next five years. • Given the likely scale of Glasgow City region's contribution and share of Affordable Housing Supply Programme, this level of longer-term commitment and funding certainty will bolster recruitment and retention of development and construction capacity within the region.	
	5. likely pace and scale of delivery based on completion rates	• Auditing of long-term delivery trends reveals that the decline in delivery of urban brownfield land following the Global Financial Recession has been particularly severe in Glasgow. This is in significant part due to the decline in the delivery of flatted developments in Glasgow City. At current levels of delivery it will take over 40 years to develop out the brownfield land in Glasgow. (Clydeplan Housing Land Audit 2019) • Glasgow has long-term commitments to deliver strategic developments including: o New Neighbourhoods (at Garthamlock, Oatlands, Ruchill/Keppoch and Drumchapel); o Transformational Regeneration Areas (at Maryhill, Laurieston, Gallowgate, Sighthill, North Toryglen, Pollokshaws, Barmulloch and Ibrox); o Community Growth Areas (at Robroyston, Baillieston/Broomhouse/Carmyle and Easterhouse). • As well as these, Glasgow City has attracted significant interest in Build to Rent investment: "Glasgow has seen a continuing expansion of proposed Build to Rent schemes, with site availability in the City Centre less constrained than in Edinburgh. The total number of Build to Rent units in the city's pipeline continues to rise and is now almost 4,500 homes. Again, in contrast to Edinburgh, the majority of the planned Build to Rent units in Glasgow are in largescale masterplans and higher volume schemes typically between 300 and 700 units. The increased density of schemes in Glasgow can drive economies of scale." ('Build to rent Scotland: Scottish Market Review Summer 2020' Rettie)	
	6. recent development levels	• Last 5 year All tenure Completions 11,025: 2,205 per annum (2016-2020) • Last 10 year All Tenure completions 20,300: 2,030 per annum • Default 10 year Minimum All Tenure Housing Land Requirement 21,450: 2,145 per annum	

		• Completion rates have improved in recent years, bolstered by a strong Affordable Housing Supply Programme delivery. The Affordable Housing Supply Programme is expected to continue to perform strongly due to funding commitments. However, this might be offset by weaker private sector performance.	
	7. social factors	• Measured against benchmarks for other cities and regions across the UK, Glasgow and the City Region has comparatively affordable housing market areas with good quality of life indicators (amenities, blue and green infrastructure).	
	8. environmental factors	• Glasgow has particular challenges in relation to managing flood risks and adaptation. However, there are significant investments to improve infrastructure via the Metropolitan Glasgow Strategic Drainage Partner Strategic Housing Investment Plan (MGSDP) as well as intensive focus on optimising the development potential of zones within 500m of the Clyde River through the Clyde Mission.	
Stage 2B Stock Projection factors	**9.** Planned demolitions	• Glasgow has a long-term re-provisioning strategy tied to the large-scale voluntary transfer of housing stock (2003), which continues to be delivered via Transforming Communities: Glasgow (TC: G), of which Scottish Government is a strategic partner, and includes 8 transformational regeneration areas. This programme is an example of how affordable housing investment is often required to tackle issues with pre-existing supply as well providing new build. Though planned demolitions via the transformational regeneration areas programme are complete, across the city's 100,000+ social rented homes, there are further examples of where existing stock does not meet the changing diverse needs in the city over time and therefore it is expected that there will continue to be an element of re-provisioning that is included within the strategic housing investment programme.	
	10. Housing brought back into effective use	• Empty homes strategy and strategic acquisitions plan will increase supply of effective affordable housing without increasing the land requirement. In recent years, this approach has delivered between 1-3% of additional affordable housing supply.	
11. Spatial Strategy Considerations (Regional Spatial Strategies and Local Development Plan)		Glasgow City is an integral component of the Glasgow City Region and committed to continuing to support the established compact city model. Glasgow City notes that at April 2020 (pre-pandemic) its Established Land Supply had a capacity for 36,841 homes spatially distributed across the City and providing opportunities for a range of tenures, housing types, and affordability.	
12. Indicative and Conditional 10 year Adjusted Housing Estimate		As an integral part of the Glasgow City Region functional Housing Market Area, Glasgow notes and supports the impact of applying a collective method to the re-apportionment of 'mobile demand'.	**17,070**
13. Flexibility		Glasgow shares the concerns of the Glasgow City Region partner Strategic Housing Investment Plan about the lack of evidence or justification for the blanket uplift in land provision in light of the climate emergency and the Scottish Government's own concerns that there is no clear link between an increase in delivery rates and the allocation of a generous supply of additional land. Glasgow notes the in-built flexibility uplift, while presented as a 25% increase, is equivalent to a 32.38% uplift on the 2018-based household projection for the period 2022 to 2033 (13,245) and that this is one of five separate stages where the Minimum All Tenure Housing Land Requirement process potentially 'uplifts' the National Record for Scotland projection. For Glasgow the uplifts at each stage are 3.77%; 0%, 25.75%, 32.38% and 0.05%. Cumulatively the 'flexibility' in-built to the Minimum All Tenure Housing Land Requirement process equates to a 61.95% uplift for Glasgow City.	**25%**
14. Indicative and Conditional Adjusted 10 year Minimum All Tenure Housing Land Requirement (rounded)		Glasgow notes the Minimum All Tenure Housing Land Requirement shown here equates to 8,205 more homes than additional households projected to form 2022 to 2033 or the provision of land for 8 homes for every 5 additional households.	**21,350**

INVERCLYDE COUNCIL			**ALL TENURE**
Stage 1 Housing Need and Demand Assessment 3 10 year Housing Estimate		**Source: Housing Need and Demand Assessment 3 Tool Estimates**	180
		BEYOND THE Housing Need and Demand Assessment - Minimum All Tenure Housing Land Requirement ESTIMATE	
Factors	**Description**	**Evidence**	**Impact on Housing Need and Demand Assessment 3 Estimate (+/-/=)**
Stage 2A - Housing Need and Demand Assessment 3 (Housing Estimate Adjusted for Mobile Demand		• **See above**	557
Stage 2B **Judgement-based factors**	**1.** economic factors which may impact on demand and supply	• Inverclyde Council is progressing its 3 City Deal projects, all of which will contribute economic growth and other benefits for Inverclyde. These include: Greenock Ocean terminal (improve image and increase visitors); Inchgreen (increase employment opportunities); and Inverkip Infrastructure (facilitate housing development)	+
	2. capacity within the construction sector	• As the largest city region in Scotland and a significant driver of the Scottish Economy, any capacity issues in the construction sector, including in relation to materials and labour, are not likely to impact on long term delivery or on regional and local ambitions. • However completions evidence indicates there is construction capacity for significantly more than 250 houses over 10 years including in particular within the social sector where development capacity has recently increased given the More Homes Scotland funding commitments.	+
	3. the potential inter-dependency between delivery of market and affordable housing at the local level	• The affordable housing policy requirement within the proposed Inverclyde Local Development Plan is limited to greenfield sites in the Inverclyde villages so will have limited impact.	
	4. availability of resources (in particular to deliver social housing)	• The STRATEGIC HOUSING INVESTMENT PLAN for 2021-2026 identifies priority projects with a capacity of 746 units and slippage projects with a capacity of 235 units, providing a potential total of 981 units in the period to 2026, although it is noted that 548 of these are programmed for 2021/22, prior to the final Minimum All Tenure Housing Land Requirement being published in National Planning Framework 4. • The indication from the Scottish Government in Housing to 2040 and the Infrastructure Investment Plan is that recent levels of funding for social housing development will be maintained. Whilst previous social housing building rates are unlikely to be maintained in Inverclyde as focus changes to acquisitions/buy-backs, resources are likely to provide for more houses than the suggested Minimum All Tenure Housing Land Requirement figure when combined with private completions.	+
	5. likely pace and scale of delivery based on completion rates	• In the revised Housing Land Audit supporting the 2021 Proposed Local Development Plan, there are 2,808 units projected to be completed between 2021 and 2026, which averages at 361pa. This includes a significant number of completions under the More Homes Scotland programme. • The Council is currently determining planning applications for the Spango Valley and Inverkip Power Station sites, which have capacity for 1,000+ houses.	+
	6. recent development levels	• In the past 5 years (April 2015- March 2020), the Housing Land Audit has recorded 726 completions, which averages at 145pa. • In the past 10 years (April 2010 –March 2020), the Housing Land Audit has recorded 1,903 completions, which averages at 190pa • The default 10 year Minimum All Tenure Housing Land Requirement is 250 units, which averages at 25pa	+
	7. social factors	• Reversing population decline is a priority of the Inverclyde Outcome Improvement Plan, with a series of actions identified to address this, including in 2019/20 the development of a Repopulation Strategic Investment Framework and Action Plan. • 2019-20 saw an increase in in-migration and decrease in out-migration, although natural change resulted in an overall population decrease. (National Record for Scotland)	+
	8. environmental factors	• The Proposed Local Development Plan (2021) identifies land for over 5000 houses in Inverclyde, much of which is on brownfield land and in 'Priority Places' identified by the Local Development Plan. • There are 8 Priority places identified in the plan, all of which have housing development as an integral part of their strategy. • Whilst there are environmental constraints as identified in the Local Development Plan Strategic Environmental Assessment including Muirshiel Country Park, pressured greenbelt areas and areas of high landscape value, there are also brownfield development opportunities including 156ha of vacant and derelict land in 2020, much of which is identified for housing development.	+
Stage 2B Stock Projection factors	**9.** Planned demolitions	• Currently there is no identified demolition programme. However, current and future Registered Social Landlord development programmes will result in vacancies in older stock that will be managed to allow the demolition of stock that cannot be brought up to standard. In addition, the Council is implementing a strategy which is working towards the demolition of 450 buy to sell flats in the Clune Park area of Port Glasgow.	
	10. Housing brought back into effective use	• From 2017-2020, the Council's Empty Homes Service has contributed to 44 empty houses being brought back into use, with a further 50 active cases at September 2020.	
11. Spatial Strategy Considerations (Regional Spatial Strategy and Local Development Plan)		The Council's Adopted (2019) and Proposed (2021) Local Development Plans reflect the Inverclyde Outcome Improvement Plan 'Population' priority through the allocation of land for 5,000+ houses. Many of these housing opportunities exist within the 8 Priority Places identified by the Proposed Plan. These are larger scale development opportunities with the potential to have a transformational impact on their surroundings and, in some cases, on Inverclyde as a whole.	+

	Policies supporting housing development and brownfield land development offer mutual support to each other, with housing offering the most realistic development option for much of Inverclyde's brownfield land, and the tackling of Inverclyde's legacy of brownfield land will in turn make Inverclyde a more attractive and successful place to live. Many of the Council's Priority Places sit within or close to the Clyde Mission Corridor. This and the Indicative Regional Spatial Strategy reinforce the importance of improving vacant and derelict land, and the role that housing has in this. It is important that Inverclyde's ambition to stabilise its population and tackle vacant and derelict land is reflected in an ambitious but realistic Minimum All Tenure Housing Land Requirement which identifies it as an area open to housing development in the right place.	
12. Indicative and Conditional 10 year Adjusted Housing Estimate		**1,200**
13. Flexibility	• See Part 3	**25%**
14. Indicative and Conditional Adjusted 10 year Minimum All Tenure Housing Land Requirement (rounded)	•	**1,500**

Factors	Description	Evidence	Impact on Housing Need and Demand Assessment 3 Estimate (+/-/=)
NORTH LANARKSHIRE COUNCIL			**ALL TENURE**
Stage 1 Housing Need and Demand Assessment 3 10 year Housing Estimate		**Source: Housing Need and Demand Assessment 3 Tool Estimates**	5,090
		BEYOND THE HOUSING NEED AND DEMAND ASSESSMENT - Minimum All Tenure Housing Land Requirement ESTIMATE	
Stage 2A - Housing Need and Demand Assessment 3 (Housing Estimate Adjusted for Mobile Demand		• **See above**	5,897
Stage 2B **Judgement-based factors**	**1.** economic factors which may impact on demand and supply	• North Lanarkshire has one of the fastest growing economies in Scotland: ○ 41% increase in GVA over 2008-2018[1] ○ 24% increase in business base over the last decade[2] ○ 10.2% increase in the number of jobs per resident since 2013[3] • Evidence of a strong position and good recovery from Covid-19 with: ○ Strong demand for new homes reported from housebuilders across North Lanarkshire sites ○ North Lanarkshire identified as the 5th most resilient Scottish local authority to recover from economic shock resulting from Covid-19[4] • An overarching shared ambition with partners for improved inclusive growth: ○ The Plan for North Lanarkshire ○ The Place, The Vision ○ The Economic Regeneration Delivery Plan ○ Our Economic Recovery Plan ○ City Deal	+
	2. capacity within the construction sector	• As the largest city region in Scotland and a significant driver of the Scottish Economy, any capacity issues in the construction sector, including in relation to materials and labour, are likely to impact on long term delivery or on regional and local ambitions.	-
	3. the potential inter-dependency between delivery of market and affordable housing at the local level	• Increasing potential inter-dependency between delivery of market and affordable housing with: ○ Development Pathfinder approach implemented in North Lanarkshire helping bring forward stalled sites and create mixed tenure developments ○ Affordable Housing Policy in place for the Cumbernauld Housing Sub-Market Area. 233 homes expected to be delivered through this policy during the lifetime of the current Strategic Housing Investment Plan.	+
	4. availability of resources (in particular to deliver social housing)	• North Lanarkshire has a very ambitious new build programme with: ○ 5,000 new council homes planned to be delivered by 2035. Of this, 839 have been delivered through new build and 499 through a combination of Empty Homes Purchase Scheme and Open Market Purchase Scheme ○ 2,671 new affordable homes planned to be delivered over the next 5 years with an affordable Housing Supply Programme budget of £171M ○ The Local Development Plan10-year Housing Supply Target is for 2,535 social units (1,270 over 5 years). 1,730 more social units are already programmed over the next 5 years	=
	5. likely pace and scale of delivery based on completion rates	• Projected continued pace and scale of delivery based on previous completion rates pre Covid-19 and evidence of recovery within construction since initial lockdown restrictions: ○ Private sector completion rates increased by 103% over the 2010/11 to 2018/19 period and averaged 741 units per year over the period ○ Social sector completion rates increased by 48% and averaged 173 units per year over the 2010/11 to 2018/19 period	+
	6. recent development levels	• Healthy recent development levels projected to continue, with completions in the last 10 years 49% greater than the default Minimum All Tenure Housing Land Requirement : ○ 5,546 all tenure completions over the past 5-year period (2015/16 – 2019/20 Housing Land Audit) – 1,109 per annum ○ 9,390 all tenure completions over the past 10-year period (2010/11 to 2019/20 Housing Land Audit) – 939 per annum ○ Default 10- Minimum All Tenure Housing Land Requirement is 6,300 – 630 per annum	=

[1] https://www.gov.uk/government/collections/hmrc-coronavirus-covid-19-statistics
[2] https://www.gov.uk/government/collections/hmrc-coronavirus-covid-19-statistics
[3]Labour Nomis Report 2013- 2020
[4] Oxford Economics Vulnerability Index, Oxford Economics, 2020, published in Regional Skills Assessments Lanarkshire, March 2021, Skills Development Scotland

	7. social factors	• Social factors projected to increase housing need and demand include: ○ An increasing number of older, smaller households and people with complex care needs supported at home as opposed to care homes increasing the need for accessible and adaptable housing, care and support ○ 40% increase in people aged 65+ over 2018-43 period and 71% increase in those aged 75+[5] ○ Greater prevalence of long-term conditions in North Lanarkshire with 49% of households containing someone with a Long Term Condition compared to 44% of Scotland[6] ○ 109 of the 1,406 (10.4%) most deprived data zones in Scotland, the 6th highest in Scotland[7] ○ Affordability issues with around 41% of households in North Lanarkshire estimated to be unable to afford the average market rent[8] ○ Increasing pressure and demand for social rented housing with 13,366 applicants on the council's Common Housing Register, including 482 homeless applicants[9]	**+**
	8. environmental factors	• There are several environmental factors identified: ○ Development on brownfield sites prioritised but often associated high remediation and infrastructure costs and predominantly council sites ○ Decarbonisation of homes will require additional resources and may result in fewer homes being delivered	**-**
Stage 2B **Stock Projection factors**	**9.** Planned demolitions	• Limited numbers of demolitions are planned in the private sector but significant numbers in the social sector: ○ 165 units demolished as part of the multi-storey/low demand reprovisioning programme to date ○ 1,585 further multi storey and low-demand flatted homes to be demolished by 2025	**-**
	10. Housing brought back into effective use	• The council operates an Empty Homes Purchase Scheme and an Open Market Purchase Scheme: ○ 499 homes brought back into council use through Empty Homes Purchase Scheme and Open Market Purchase Scheme [10] ○ There are 1,786 empty properties in North Lanarkshire[11] equivalent to 1.1% of all housing stock	**=**
11. Spatial Strategy Considerations (Regional Spatial Strategy and Local Development Plan)		• 2019 7-year Programmed Land Supply 12,482 • 2019 Established Land Supply 22,827	
12. Indicative and Conditional 10 year Adjusted Housing Estimate			5,897
13. Flexibility		•	1,474
14. Indicative and Conditional Adjusted 10-year Minimum All Tenure Housing Land Requirement (rounded)		•	**7,371** **(7,350)**

[5] NATIONAL RECORD FOR SCOTLAND 2018 Based Population Projections
[6] The Scottish House Condition Survey, 2019
[7] Scottish Government SIMD Data, 2020
[8] Affordability Analysis, Arneil Johnstone, 2021
[9] North Lanarkshire Council Common Housing Register Data as at 31st March 2021
[10] North Lanarkshire Council Data as at 1st August 2021
[11] North Lanarkshire Council Tax Data as at 15th February 2021

RENFREWSHIRE			**ALL TENURE**
Stage 1 Housing Need and Demand Assessment 3 10 year Housing Estimate		**Source: Housing Need and Demand Assessment 3 Tool Estimates**	3,911
		BEYOND THE Housing Need and Demand Assessment - Minimum All Tenure Housing Land Requirement ESTIMATE	
Factors	**Description**	**Evidence**	**Impact on Housing Need and Demand Assessment 3 Estimate (+/-/=)**
Stage 2A - Housing Need and Demand Assessment 3 (Housing Estimate Adjusted for Mobile Demand		• **See above**	3,913
Stage 2B **Judgement-based factors**	**1.** economic factors which may impact on demand and supply	• Renfrewshire's Economic Strategy 2020 - 2030 • City Deal Projects • Clyde Mission – aspiration to increase working age population across Renfrewshire	
	2. capacity within the construction sector	• As the largest city region in Scotland and a significant driver of the Scottish Economy, any capacity issues in the construction sector, including in relation to materials and labour, are not likely to impact on long term delivery or on regional and local ambitions.	
	3. the potential inter-dependency between delivery of market and affordable housing at the local level	• New affordable housing policy in the Proposed Renfrewshire Local Development Plan 2021 (as modified) will increase connection between the delivery of market and affordable housing however this won't have a significant impact on the all tenure requirement. • Strategic Housing Investment Plan's core and shadow development programme includes a land supply of 1473 units, this includes a level of over programming (approximately 25%). Council also progressing a housing investment programme which will add new Council new build sites to future versions of the Strategic Housing Investment Plan. Funding levels available through the Strategic Housing Investment Plan programme remains key to the rate of delivery of affordable homes.	
	4. availability of resources (in particular to deliver social housing)	• Scottish Government have committed to deliver 100,000 additional affordable homes (2021-31) and budgeted for >£3billion grant funding over the next five years. • Given the likely scale of Glasgow City region's contribution and share of affordable Housing Supply Programme, this level of longer-term commitment and funding certainty will bolster recruitment and retention of development and construction capacity within the region.	
	5. likely pace and scale of delivery based on completion rates	• Pace and scale of delivery has increased during the last 5 year period. • Approximately 20% of all completions during the last 10 years have been within Dargavel Village Community Growth Area which has consent to deliver 4000 new homes on brownfield land.	
	6. recent development levels	• Last 5 year All tenure Completions total 3698 and annual 740 • Last 10 year All Tenure completions total 6037 and annual 604 • Default 10 year Minimum All Tenure Housing Land Requirement total 4,900 and annual 490	
	7. social factors	• Quality of homes and impact on wellbeing, access to new affordable homes, credit availability for private homes, recovery from Covid. • Full Housing Need and Demand Assessment required to fully understand housing need and any unmet need in relation to affordable and market homes.	
	8. environmental factors	• Climate change agenda and recovery from Covid with increased emphasis on 20 minute neighbourhoods, placemaking and improve access to open space. • Quality of homes and place over quantity. • Local Development Plan Spatial Strategy focuses on the delivery of brownfield and previously used land.	
Stage 2B Stock Projection factors	**9.** Planned demolitions	• Council's newbuild and investment programme will include the demolition of poor quality/low demand housing stock which will be replaced by new homes more aligned to housing need and demand across Renfrewshire. • In some locations this could result in a net reduction in the number of homes.	
	10. Housing brought back into effective use	• Council's Empty Homes Programme is bringing empty properties back into effective use, unlikely to have a significant impact on the overall minimum requirement.	
11. Spatial Strategy Considerations (Regional Spatial Strategy and Local Development Plan)		• The approach is in line with the Spatial Strategy set out in the adopted and emerging Local Development Plan which focuses on the redevelopment of brownfield and previously used land first in line with the City Region's established Compact City model.	
12. Indicative and Conditional 10 year Adjusted Housing Estimate			
13. Flexibility			**25%**
14. Indicative and Conditional Adjusted 10 year Minimum All Tenure Housing Land Requirement (rounded)			**4,900**

SOUTH LANARKSHIRE			ALL TENURE
Stage 1 Housing Need and Demand Assessment 3 10 year Housing Estimate		**Source: Housing Need and Demand Assessment 3 Tool Estimates**	6,219
BEYOND THE Housing Need and Demand Assessment - Minimum All Tenure Housing Land Requirement ESTIMATE			
Factors	**Description**	**Evidence**	**Impact on Housing Need and Demand Assessment 3 Estimate (+/-/=)**
Stage 2A - Housing Need and Demand Assessment 3 (Housing Estimate Adjusted for Mobile Demand		• **See above**	6,291
Stage 2B **Judgement-based factors**	**1.** economic factors which may impact on demand and supply	• There are a range of economic factors which may positively impact on the ability to achieve or exceed the estimated figure. This includes: o progress made within the South Lanarkshire Economic Development Strategy o participation Regional City Deal Infrastructure Programme o focussed Town Centre regeneration programmes o Affordable housing supply programme subsidy from the Scottish Government o Access to the Levelling Up Fund	
	2. capacity within the construction sector	• As the largest city region in Scotland and a significant driver of the Scottish Economy, any capacity issues in the construction sector, including in relation to materials and labour, are not likely to impact on long term delivery or on regional and local ambitions.	
	3. the potential inter-dependency between delivery of market and affordable housing at the local level	• The council is confident local arrangements within the Local Development Plan and Local Housing Strategy adequately cover this area and will allow affordable housing supply to be maximised.	
	4. availability of resources (in particular to deliver social housing)	• The council is not currently aware of any positive or negative factors around the availability of resources that would influence our estimations.	
	5. likely pace and scale of delivery based on completion rates	• Last 5 year completions – 6,020: 1,204 per annum (HLA 2019 • Last 10 year completions - 10,679: 1,068 per annum (HLA 2019) • Default Minimum All Tenure Housing Land Requirement Estimate – 7,800: 780 per annum • Despite the challenges presented to the planning and housing sector over the past year from the Covid-19 pandemic, delivery rates have been maintained. • Should restrictions relating to the pandemic continue to reduce, we would expect to see pace and scale maintained at current rates or increase. • Consideration should also be given to the positive impact Community Growth Areas will have to the rate of completion.	
	6. recent development levels	• Despite the challenges of the Covid-19 pandemic, the rate of site starts has been retained. There are however some delays to the commencement of the projects within town centre redevelopment as a result of funding not being accessible for a short period. The council and its developing RSL partners did also experience disruption to the affordable housing supply programme, with completion rates slowing and a lower number of total units completed within 2020/21 than previously anticipated. Should restrictions continue to be relaxed it is hopeful no further disruption will be had. • These short term issues are unlikely to impact on longer term planning assumptions.	
	7. social factors	• Further detail on this area informed through a fuller assessment of need and demand would be beneficial. • Demand for social housing remains high within South Lanarkshire with a range of needs requiring to be met through the provision of new affordable housing. This includes housing suitable for older people linked to demographic change. • In addition to this, the council is actively working to understand the need and demand for Gypsy/Traveller accommodation within South Lanarkshire. Linked to the Scottish Government's Improving Lives of Gypsy/Travellers Action Plan and proposed capital funding this assessment may determine requirement for additional accommodation for Gypsy/Travellers.	
	8. environmental factors	• The council's Local Development Plan and other key strategic documents including the Local Housing Strategy and Sustainable Development and Climate Change Strategy take account of the required environmental and sustainability aspects of new housing supply. • Consideration should be given however to the additional decarbonisation requirements for developers contained within the proposed New Build Heat Standard and Heat in Buildings Strategy. Particularly for affordable housing supply these requirements will increase unit costs which unless matched by subsidy increases will potentially result in less units being achieved.	
Stage 2B	**9.** Planned demolitions	• The council is currently finishing a planned programme of demolitions as part of a housing-led regeneration project and a low level of further selective demolitions are likely in some rural settlements with low demand for social rented housing.	

Stock Projection factors	**10.** Housing brought back into effective use	• Through its Strategic Housing Investment Plan, the council has set a target of a minimum of 15 empty homes to be brought back into use per annum, subject to annual review. As part of this approach, internal processes are being altered to allow the council to purchase suitable empty properties for social rent in areas of high demand. • As part of this approach, internal processes have been amended to allow the council to purchase suitable empty properties for social rent in areas of high demand. In addition, the council also operates an Open Market Purchase Scheme, with a target of 100 units per annum, subject to review, included in the Strategic Housing Investment Plan.	
11. Spatial Strategy Considerations (Regional Spatial Strategy and Local Development Plan)			
12. Indicative and Conditional 10 year Adjusted Housing Estimate			
13. Flexibility		•	**25%**
14. Indicative and Conditional Adjusted 10 year Minimum All Tenure Housing Land Requirement (rounded)		•	**7,850**

West Dunbartonshire Council			ALL TENURE
Stage 1 Housing Need and Demand Assessment 3 10 year Housing Estimate		**Source: Housing Need and Demand Assessment 3 Tool Estimates**	347
BEYOND THE Housing Need and Demand Assessment - Minimum All Tenure Housing Land Requirement ESTIMATE			
Factors	**Description**	**Evidence**	**Impact on Housing Need and Demand Assessment 3 Estimate (+/-/=)**
Stage 2A - Housing Need and Demand Assessment 3 (Housing Estimate Adjusted for Mobile Demand		• **See above**	715
Stage 2B **Judgement-based factors**	**1.** economic factors which may impact on demand and supply	• Clyde Mission investment to transform land use within 500m of Clyde, including sites of strategic economic importance and increasing residential potential; • There are no significant changes to the economy of the area expected that would impact significantly on housing land numbers.	
	2. capacity within the construction sector	• As the largest city region in Scotland and a significant driver of the Scottish Economy, any capacity issues in the construction sector, including in relation to materials and labour, are not likely to impact on long term delivery or on regional and local ambitions. • Completion evidence from the agreed Housing Land Audits over the last 10 years would suggest that there is considerable more capacity in the construction sector than the minimum 350 houses allocated to West Dunbartonshire.	
	3. the potential inter-dependency between delivery of market and affordable housing at the local level	• No change as no affordable housing quota policy.	
	4. availability of resources (in particular to deliver social housing)	• The indication from Scottish Government is that funding is likely to hold up for the next few years but longer term planning over a 10 year period is uncertain. • The impact of the drive to low and zero carbon housing is not fully known but may have a generally depressing impact on the volume delivered whilst quality and standards may improve.	
	5. likely pace and scale of delivery based on completion rates	• Delivery can vary between years of high and low growth. • In the Housing Land Audit (2019), there are 1,893 units projected to be completed between 2020 and 2025, which averages at 378 pa. This includes almost half through social sector delivery.	
	6. recent development levels	• In the past 5 years (2015-2020) there have been 879 completions recorded within the draft 2020 Housing Land Audit*: 176 units per annum. • Over the last 10 years (April 2010 to March 2020), there have been 2,043 completions (on sites with capacity of 4 or more houses): 204 units per annum. *The HLA is utilised rather than the NB2 (New Build) data used by the Government, which is considered to be inaccurate and not as robust as the Council's HLA's and Council Tax data. • The default 10 year Minimum All Tenure Housing Land Requirement is 450 units: 45 units per annum. • If the average completion rate is maintained over the next ten years then there will be an increase from the Minimum All Tenure Housing Land Requirement .	
	7. social factors	• The Local Outcome Improvement Plan: The Plan for Plan (2017-2022) and the Council Plan (2017-2022) contain a series of strategic priorities for the Community Planning Partner Strategic Housing Investment Plan and the Council which focus on increasing the quality and availability of affordable housing; communities are sustainable and attractive; adult and older people living independently in the community; and improved life changes for children, young people and families. • Local Development Plan 2 is about creating places for people and a green infrastructure first approach to development. It is focused on creating walkable and connected communities based on 15/20 minute neighbourhood concept. It ties in nature based solutions and focuses extensively on health and well being through placed based approach to development. • The new Local Housing Strategy, which is currently being written, is going through a full Health Impact Assessment and new development plans and major planning applications will also be required to do a health impact assessment under the new Planning Act. • WDC is has one of the highest concentrations of deprivation in Scotland.	
	8. environmental factors	• The move to net zero by 2045, climate emergency, and other environmental issues may have a greater impact on the ability to deliver housing as more housing will have an impact on this policy agenda items.	

		• Therefore, the push towards brownfield sites would have a greater environmental impact as it would protect the greenbelt and greenfield land and thus the environment. Local Development Plan 2's strategy is for new housing to be built on brownfield land in preference to greenfield.	
Stage 2B Stock Projection factors	**9.** Planned demolitions	WDC demolition rate is approximately, 0.05% across all tenures and this is expected to contract as the majority of planned demolitions have been carried out.	
	10. Housing brought back into effective use	Over the last year 30 units were brought back into effective use, and this trend is expected to continue over the next 10 years.	
11. Spatial Strategy Considerations (Regional Spatial Strategy and Local Development Plan)		The Council's Local Development Plan 2 Proposed Plan sets out in its Spatial Strategy and housing policies an ambition to deliver a sustainable and generous supply of housing land to grow the local economy, deliver strategic its housing regeneration priorities and create attractive, accessible places which strengthen existing communities. In particular the reuse of urban brownfield land (which comprises a large proportion of the Council's housing land supply) and key regeneration sites is a priority. An uplift to the baseline Minimum All Tenure Housing Land Requirement figure is therefore considered appropriate to reflect both the policy ambitions of the development plan and the indicated capacity in the local housing market and construction sector.	**+965**
12. Indicative and Conditional 10 year Adjusted Housing Estimate			**1,680**
13. Flexibility			**25%**
14. Indicative and Conditional Adjusted 10 year Minimum All Tenure Housing Land Requirement (rounded)			**2,100**