



Midlothian

PLANNING (SCOTLAND) ACT 2019 – NATIONAL PLANNING FRAMEWORK 4 (NPF4) HOUSING FIGURES CONSULTATION

Report by Chief Officer Place

1 PURPOSE OF REPORT

- 1.1 The purpose of this report is to seek the Committee's approval of a draft response to the Scottish Government's consultation on proposed housing numbers/targets and the methodology for their calculation to be incorporated in the draft National Planning Framework 4 (NPF4), which is scheduled for publication in the autumn 2021.

2 BACKGROUND

- 2.1 In September 2019, the Government published its programme for implementing the Planning (Scotland) Act 2019 (which received royal assent on 25 July 2019). It proposes a series of consultations with local planning authorities, key agencies, key stakeholders, community organisations and members of the public on the necessary secondary legislation/regulations and additional guidance required to implement various sections of the new Act, including NPF4.
- 2.2 NPF4 will set out the Scottish Government's planning policy position and will form part of the development plan; meaning it will be the primary consideration, along with a Council's local development plan, in the determination of planning applications and appeals and it will direct the preparation of local development plans. In Midlothian's case it will provide a framework for the preparation of the Midlothian Local Development Plan 2 (MLDP2), the first Midlothian Local Development Plan being adopted in November 2017. The programme for the preparation and adoption of MLDP2 is set out in the Development Plan Scheme for Midlothian number 13 (DPSM13) approved by the Committee at its meeting of 6 April 2021. Fundamental to the preparation of a development plan is an understanding of housing targets. NPF4 will set these targets.
- 2.3 The Council previously submitted a response to the initial "call for ideas" on NPF4 in March 2020 and, through SESplan, collaborated on the preparation and submission of an interim Regional Spatial Strategy for Edinburgh and the South East of Scotland (the SESPlan area) in September 2020 to further inform the preparation of NPF4.

- 2.4 The Covid-19 lockdown restrictions in early 2020 and again in late 2020/early 2021 have delayed the publication of the draft NPF4. The Scottish Government plans to publish and conduct consultations on the draft in the autumn of this year and will seek Ministerial approval for the finalised NPF4 in autumn 2022. The current consultation on housing targets was published prior to the “purdah” period associated with the recent Scottish Parliamentary Election and runs until 4 June 2021 (however, Homes for Scotland, the umbrella organisation that represents the national house builders has requested an extension to the consultation – a decision in this regard had not been made at the time of drafting this report). The purdah period has also delayed publication of associated regulations on the new Local Development Plan process.

3 PROPOSED NPF4 HOUSING FIGURES

- 3.1 The consultation paper sets out the method used and stages involved in calculating the proposed housing numbers together with the information used including the data sources and outputs produced. It also includes an opportunity for local authorities to propose locally adjusted housing estimates using alternative assumptions to the national household projections and a higher flexibility allowance. A template, guidance and an excel calculator has been provided to support any such responses.
- 3.3 The Government is asking local authorities to:
- a. Consider the initial default estimates and whether alternatives to the default assumptions about household projections and existing housing need should be applied;
 - b. Consider whether they wish to propose a different flexibility allowance, which should generally be greater than the proposed 25% minimum for urban areas and 30% minimum for rural areas;
 - c. Assess the extent to which the proposed land requirement compares with past completions for their area. Where the proposed requirement is substantially lower, the Government’s view is that authorities should consider whether it should be increased further; and
 - d. Set out a locally adjusted estimate of the minimum all-tenure housing land requirement for their local authority area as a result of these adjustments

A copy of the consultation paper and the proposed Council response is attached as appendices A and B respectively – the response has been prepared in consultation with Housing Services.

- 3.4 The Government has used the Housing Needs and Demand Assessment (HNDA) tool to identify an initial default estimate of housing need. The HNDA tool is a commonly accepted approach used for calculating estimates of housing need and to identify development scenarios to inform housing supply targets for the Local Housing

Strategy and Local Development Plan. The 2018 household projections produced by National Records of Scotland (NRS) have been tallied with the Government's count of existing housing need (an annual statistical return from local authorities) to give an initial ten year default estimate. A flexibility allowance (25%) has then been added to this figure to identify an overall housing land requirement. The housing land requirement (expressed in house equivalent terms) is the total amount of land needed to ensure that the agreed housing need can be met in full over the plan period.

- 3.5 In Midlothian the estimated need over the MLDP2 period (assumed 2026 – 2036) is identified as 6,450 units plus a flexibility allowance of 1,600 units (25%) giving a total land requirement of 8,050 units (all figures have been rounded to the nearest 50). The proposed housing numbers are broadly consistent with the previous Proposed SESplan 2 figures (6,408 units and 7,049 unit land requirement). It is also generally consistent with house completion rates in recent years and reflects the current capacity within the house building industry to deliver (as agreed with Homes for Scotland through the annual Housing Land Audit process). It is the much larger flexibility allowance of 25% compared to 10% which results in a comparably higher land requirement. The housing numbers (based on current figures) are set out in the below table and show that for the period 2026-2036, using the NPF4 target, Midlothian would need to either allocate land or increase existing densities to deliver an additional 409 houses for the period 2026-2036. Furthermore, the 409 target may be reduced if the house building industry do not deliver on their build programme for 2020-2026, increasing the outstanding land supply as of 2026 which in turn is balanced off against the NPF4 target.

Housing Numbers Table

	Housing Unit Numbers
Existing housing land supply ¹ .	11,605
Houses programmed to be built 2020-2026 ² .	6,609
Anticipated outstanding land supply 2026 ³ .	4,996
Proposed NPF4 housing target 2026 -2036	8,050
Anticipated outstanding land supply 2026 ³ .	4,996
Safeguarded sites ⁴ .	1,395
Windfall housing for 2026-2036 ⁵ .	1,250
Housing Shortfall⁶.	409

1. *This figure is set out in the 2020 Midlothian Housing Land Audit and includes: houses under construction, houses with planning permission but not yet built, committed allocated housing sites within the MLDP which do not yet have planning permission and are not constrained.*

2. *Based on house build programmes agreed with Homes for Scotland and set out in the 2020 Midlothian Housing Land Audit.*

3. *Existing housing supply minus houses built by 2026 (11,605 minus 6,609)*

4. *Safeguarded sites are housing sites identified in the MLDP for longer term housing allocation, but are not yet allocated so do not count against the housing supply targets.*
 5. *Windfall housing sites are those that were not anticipated at the time of the MLDP adoption – approximately 125 windfall houses are built a year.*
 6. *NPF4 housing target minus Midlothian's housing shortfall, minus anticipated outstanding land supply in 2026, minus safeguarded sites, minus windfall housing for 2026-2036*
- 3.6 The proposed NPF4 figures are expressed as a minimum all tenure housing land requirement for each local authority area and do not include any assessment and/or estimate as to what proportion of that need should be met by market and affordable housing. This will be considered at a local level and collectively through the SESplan Housing Market Partnerships (HMP). The partnership is currently in the process of preparing a new HNDA to inform the next round of Local Development Plans and will take account of relevant socio-economic factors and trends at local authority level (rents, house prices, homelessness levels and overcrowded or concealed households) to come to a view on what the split should be between the two sectors.
- 3.7 The Planning (Scotland) Act 2019 requires local authorities to demonstrate how they have addressed the housing needs of older people, the disabled and Gypsy Travellers. The HNDA will play an important part in identifying these specialist sectors and the Local Housing Strategy and MLDP2 will quantify that need and facilitate delivery.

4 RECOMMENDATION

- 4.1 It is recommended that the Committee:
- (a) approves the Midlothian response to the proposed NPF4 housing figures consultation as attached to this report as Appendix B;
 - (b) does not provide any locally adjusted estimate at this stage; and
 - (c) formally submit a copy of the response to Scottish Ministers.

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Planning Manager

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Local Authority & National Park Heads of Planning
Local Authority Heads of Housing

cc.

Heads of Planning Scotland
Association of Local Authority Chief Housing
Officers
Homes for Scotland
Federation of Master Builders
Scottish Federation of Housing Associations

Our ref: A32087297

23 February 2021

Dear Colleague

NATIONAL PLANNING FRAMEWORK 4 FIRST STEP TOWARDS A MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT

Last year was unprecedented on many levels. As we have developed new approaches to policy making in response to the pandemic, our efforts to find new ways of joint working between local authorities, stakeholders and Scottish Government have brought benefits. As we move into this new year, and we progress our national spatial plan that will guide our future development to 2050, we wish to see that joint working continuing, and broadening to involve a wider range of stakeholders.

The Scottish Government is committed to enabling the delivery of high quality homes, in the right locations to meet our current and future needs.

The Planning (Scotland) Act, 2019, sets out a requirement for the National Planning Framework to include ‘targets for the use of land in different areas of Scotland for housing’. In March 2020, we consulted on a [proposed methodology](#) to meet the requirement, which suggested working with local authorities both individually and collectively in regional groupings. We received a range of responses to that consultation and an [independent analysis](#) was carried out. We also convened a Housing Advisory Panel, comprising a range of individuals with planning and housing related experience and interests. They have provided feedback to inform work on the requirement as it has progressed.

Having given consideration to the feedback, we have refined the approach and **we are now seeking your input to the next stage**. As key stakeholders in the outcomes of this work, we encourage you to engage positively through constructive co-operation. We wish to see close co-ordination between local authority planning and housing colleagues, and leadership in their engagement with local stakeholders from both the public and private sectors.



Accompanying this letter is a Method Paper that provides initial default estimates to inform the identification of a minimum all-tenure housing land requirement for individual authority areas. The paper explains that these are a **starting point** for meeting the above statutory requirement. They are the first step towards developing a Scotland-wide picture of the amount of land for housing that will be needed in the future, informed by local input, to guide allocations in Local Development Plans.

As the process is on-going, we have not yet defined the final figures that we expect to be included in NPF4. An overall figure for the whole of Scotland is therefore not provided. Figures for past housing completions in each local authority have been set out alongside the initial default estimates to help inform your consideration.

We request that authorities, either individually or collectively with regional partners:

1. Consider the initial default estimates and whether alternatives to the default assumptions about household projections and existing housing need should be applied.
2. Consider whether you wish to propose a different flexibility allowance, which should generally be greater than the proposed 25% minimum for urban areas and 30% minimum for rural areas.
3. Assess the extent to which your proposed land requirement compares with past completions for your area. Where the proposed requirement is substantially lower, our view is that authorities should consider whether it should be increased further.
4. Set out a locally adjusted estimate of the minimum all-tenure housing land requirement for your local authority area as a result of these adjustments.

This consideration should be informed by local input and evidence, and factor in policy ambitions to support growth in local housing provision. Consideration should also be given to relevant national drivers, including the six statutory outcomes set out in the 2019 Act (including rural repopulation and providing homes for older people and disabled people) and the NPF4 Position Statement, published November 2020, which sets out current thinking as work progresses towards a draft NPF4.

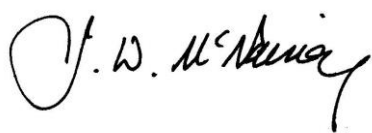
Housing Market Partnerships have a crucial role to play in this process and we encourage relevant interests to be part of this, including home providers. This is an early and important stage for inputting to the figures for NPF4. However, it is also important to note that further opportunities will be available for all stakeholders, particularly as the draft NPF4 will be issued for public consultation and considered by the Scottish Parliament. Beyond that, once published in the finalised NPF4, the Local Development Plan preparation process will provide opportunities to further consider the extent of land supply that will be provided beyond the minimum stated.

In addition to the Method Paper, a template for responding to the Scottish Government, and guidance for completing it, are enclosed along with an Excel Calculator.

We would ask that you complete and return the template with your evidence for locally adjusted estimates of the minimum all-tenure housing land requirement by **Friday 4 June 2021**. This provides time to engage locally with stakeholders and for authorities to come to a considered view. On receipt of this, the Scottish Government will consider the robustness of the evidence and estimates, prior to them being included in the draft NPF. Further information on that stage is set out in the Method Paper.

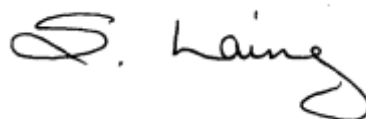
We are conscious that the legislative requirements and the processes for NPF4 and LDPs are new. Planning and Housing officials within Scottish Government will provide assistance where you would find this helpful. The information referred to above will be available online at www.transformingplanning.scot/national-planning-framework/ or please contact Carrie Thomson, Principal Planner, at carrie.thomson@gov.scot.

Yours sincerely



John McNairney

Chief Planner



Shirley Laing

Director for Housing and Social Justice

Enclosures

Method Paper	- Outlines the methodology and Initial Default Estimates
Template	- To be completed and returned
Guidance	- To support completion of the template
Excel Calculator	- To support consideration, and to be completed and returned

National Planning Framework 4

Minimum All-Tenure Housing Land Requirement

METHOD PAPER

Scottish Government

Planning & Architecture Division and Housing & Social Justice

February 2021

INTRODUCTION

1. The Scottish Government Chief Planner and Director for Housing and Social Justice have written to local authorities, national park authorities and key stakeholders providing initial default estimates of minimum all-tenure housing land requirement figures. These **figures are intended to form a starting point** for the work required to meet the statutory requirements of the Planning (Scotland) Act, 2019 for National Planning Framework (NPF) 4: for it to include targets for the use of land in different areas of Scotland for housing.
2. The figures provided are a basis for developing a Scotland-wide picture of future requirements for housing land in Local Development Plans. They are a starting point for local consideration and to enable local input. They are not the final figures that are expected to be included within NPF4.
3. The **figures in draft NPF4 will be established through collaboration**. The letter states that we expect authorities to work with their Housing Market Partnerships to inform this next stage. It also encourages stakeholders to engage positively through constructive co-operation. Local input should factor in ambitions to support growth in housing provision.
4. This paper looks to support local authorities and stakeholders in that engagement, and ensure transparency for all interests, by providing an explanation of the method taken to arrive at the initial default estimates of the minimum all-tenure housing land requirement. It provides details on:
 - The overall method and stages of the process, and
 - The steps for stage 1 and the detailed information that has been factored in, including data sources and outputs produced.
5. The method outlined below takes account of responses made to the consultation on the approach to setting housing land figures in NPF4, which was published in Spring 2020. It has also been informed by discussion with the Housing Advisory Panel, which was formed to guide this work. The comments have resulted in the method being refined in order to promote consistency of approach across Scotland, whilst also allowing the figures to be informed by local knowledge, ambition and input.
6. Officials from both Scottish Government Planning and Housing Divisions have been involved to ensure alignment of work for NPF4 with work on Housing to 2040, statutory requirements for Local Housing Strategies (LHSs) and the Housing Need and Demand Assessment (HNDA) process that supports them.
7. The Scottish Government has made available the excel spreadsheets used to calculate the initial default estimates. They contain each of the steps described below. It enables authorities to adjust the initial default estimates where they wish to explore an adjustment. The spreadsheet is termed the Excel Calculator and instructions for using it are provided.

METHOD

8. An overview of the stages for arriving at the initial default estimate of the minimum all-tenure housing land requirements, to be included in draft NPF4, is as follows:

Stage 1 Initial Default Estimate

- The number of newly-forming households is taken from the 2018-based* principle household projections produced by National Records of Scotland (NRS) and a count of existing housing need produced by Scottish Government is added to this. This is done for all local and national park authorities.
- This is equivalent to the first two steps of the Scottish Government HNDA Tool and is in line with the existing guidance that supports that process
- A flexibility allowance is then applied on top of this as a percentage. This represents a contingency or over-programming of land to reflect the longer timescale of new development plans and allow for changes in sites coming forward. The percentage applied relates to whether the area is urban or rural.
- This provides an **initial default estimate** of a minimum all-tenure housing land requirement for each local and national park authority area. The figures are a cumulative total for a period of 10 years.

The 14 steps outlined in Section 3 cover the detailed steps to explain this stage.

*It should be noted that the latest 2018-based household projections are lower than the previous 2016-based projections as a result of falling birth rates, a fall in projected migration and a stalling in improvement in life expectancy. There have also been some changes to the methodology for the 2018-based household projections. This is reflected in the initial default estimates.

9. **An overall figure for the whole of Scotland is not provided.** This is because the figures are a work in progress at this stage, they are not final.

Stage 2 **Locally Adjusted Estimate**

- Authorities will work with their Housing Market Partnerships (HMP) to consider whether evidence justifies proposing:
 - Alternative assumptions to the household projections and existing housing need defaults used at stage 1, and
 - A higher flexibility allowance.
- It is expected that authorities will take into account the completions data provided, as part of the above considerations. The completions data is from Scottish Government NB1 and NB2 returns and Housing Association new build information from Scottish Government Housing Investment Division: Affordable Housing Investment Programme.
- Where authorities consider alternative evidence is applicable, they will provide it to Scottish Government as the basis for a **locally adjusted estimate** of a minimum all-tenure housing land requirement. This will be either for their local authority or regional grouping if they prefer to work collaboratively with neighbouring authorities.
- A template, guidance and excel calculator have been provided to support responses.

Stage 3 **Minimum All-Tenure Housing Land Requirement**

- On receipt of the evidence, the Scottish Government will consider its robustness and consequences on locally adjusted estimates.
- Where evidence and estimates are considered robust, the locally adjusted estimate of the minimum all-tenure housing land requirement for each authority area will be included within draft NPF4. That will be accompanied by a paper providing a transparent explanation of how the figures had been arrived at.
- Where no adjustments are made by authorities, the Scottish Government will consider using the initial default estimate in the draft NPF. Where any evidence underpinning the locally adjusted estimates are not considered robust, Scottish Government will discuss the work in more detail with relevant authorities. Where matters cannot be resolved, consideration will be given to whether the minimum all-tenure housing land requirement included within draft NPF4 should revert to the initial default estimate or a variation of it taking into account past completions.

Terminology

Minimum

10. Once NPF4 is published, the minimum all-tenure housing land requirement will be the minimum amount of land to be identified within Local Development Plans (LDP) at the point of adoption. The method aims to be consistent, evidence-based, transparent and we expect that the figures and associated evidence, as set out in a report to accompany the draft NPF4, will be considered by the Scottish Parliament as well as being subject to public consultation at that stage. It is expected that LDPs allocate sufficient land to meet the minimum requirement and exceed it where a higher level is supported by evidence.

All-Tenure

11. For national spatial planning purposes, it is the scale of land that is required to be allocated for housing that is relevant. Figures provided will therefore be all-tenure, rather than separated for market and affordable housing. Tenure will continue to be considered at the local level in the more detailed planning for housing process of the HNDA and LHS that supports it.

Land Requirement

12. The figures maintain the focus on delivery of 'land'. The statutory requirement of the 2019 Act relates to 'use of land' and it is land use that the planning system regulates. Plans allocate land where housing will be located and the aim is to ensure there is enough land planned to meet housing need and demand. The pace at which housing comes forward depends on a number of factors; whilst planning is one, other significant influences include economic trends and investment decisions. As the amount of land to be allocated is informed by the amount of housing need and demand, we consider that expressing 'housing land requirement' as a number of units is more relevant than expressing them in acres or hectares.

National Park Authorities

13. References are made above to local authorities, however the scenario is different for the two National Park Authorities. Initial default estimates are provided for National Park Authorities and it is expected that they will work with adjoining authorities for Stage 2 of the above approach. This reflects the expectations of joint-working in the current Scottish Planning Policy (SPP).

Local Authorities in City Regions

14. Authorities can work individually or collectively with regional partners.

STEPS TO ESTABLISH INITIAL DEFAULT ESTIMATES

Step 1 Identify the raw data for household projections

Local Authority Figures

- NRS 2018-based principle household projections
[Household Projections | National Records of Scotland \(nrscotland.gov.uk\)](https://nrs.scot.nhs.uk/household-projections/)
- This is by single year, from 2022 to 2037
- The 'principle projection' is used as the default figure for all authorities
- This is equivalent to Step 1 of the HNDA Tool.
- See Annex A.

National Park Figures

- Park figures are estimated using a combination of two sources:
 - i. NRS 2018-based occupied households
[Estimates of Households and Dwellings in Scotland, 2018 | National Records of Scotland \(nrscotland.gov.uk\)](https://nrs.scot.nhs.uk/estimates-of-households-and-dwellings-in-scotland-2018/)
 - ii. NRS 2018-based principle household projections
[Household Projections | National Records of Scotland \(nrscotland.gov.uk\)](https://nrs.scot.nhs.uk/household-projections/)
- The number of occupied households in each park and each local authority is derived for 2018. For each local authority area within the park the proportion of total households within the park is derived. This proportion is then applied to the local authority household projection to derive a household projection for the whole park and the Housing Market Areas (HMAs) within the Park (the latter are also used further on in the process). The HMAs are used to estimate the household projection for the whole park. Then the proportion of each HMA sub-area of the total is derived. These proportion are then applied to the NRS household projections for the park as a whole (which NRS do produce). The HMA sub-areas are then summed to total.
- This is done because NRS do not produce household projections as sub-national park level (only park level) and these sub-areas are used later as explained further on.
- It should be noted that whilst Angus Council and Perth and Kinross Council are part of the Cairngorms National Park, the data zones involved are mainly on the council side of the park border and are included in the council figures here. This is done for the HNDA Tool as data zones cannot be split for statistical reasons. Similarly two data zones in Perth & Kinross cross into the Loch Lomond and the Trossachs National Park and for the same reason are included on the council side of the park border.

Step 2 Identify the raw data for existing housing need

- Total existing housing need* is made up of two elements:
 - i. A count of concealed and overcrowded households using the 2011 Census and uprated to the Scottish Household Statistics (2016-2018) estimates. Bespoke analysis by Scottish Government in 2020.
 - ii. Total Households in Temporary Accommodation at 31 March 2020
[Homelessness in Scotland: 2019 to 2020 - gov.scot \(www.gov.scot\)](https://www.gov.scot/homelessness-in-scotland-2019-to-2020/)

*'need' refers to those who need a new unit of housing where need cannot be met in-situ with the existing housing stock.

- For National Parks the proportions calculated above are used to estimate the proportion of existing need within the park based on local authority totals.
- This is equivalent to Step 2 of the HNDA Tool.
- See Annex B.

Step 3 Identify the flexibility allowance to be applied for each authority

- The flexibility allowance, expressed as a percentage, represents a contingency or over-programming of land to allow for changes in sites coming forward.
- A figure of 25% has been applied to urban areas and 30% has been applied to rural areas.
- Urban and rural areas have been identified using the Randall Classification. This classifies authorities based on population density: where an authority has a population density of less than one person per hectare it is considered rural.
- The classification does not cover National Parks but it is considered appropriate to include them within the rural category.
- The flexibility allowance is similar to the 'generosity' in current Scottish Planning Policy (SPP) in that it reflects the aim of ensuring that LDPs allocate a generous supply of land for housing. The flexibility percentages are, however, higher than the current SPP (10-20%) to account for the change in legislation that now requires plans to be reviewed at intervals of no more than 10 years, instead of the previous 5. As plans are likely to be in place for longer, there is a greater chance of changes to sites coming forward.
- A higher still percentage for rural areas reflects the statutory requirement in the Planning Scotland (2019) Act, that NPF must contribute to the outcome of increasing the population of rural areas of Scotland.
- See Annex C.

Step 4 Using the household projections, calculate the number of newly-forming households, 2022 to 2036 (15 years), and total them

- 2022 is the anticipated year for publication of NPF4
- 2036 is 15 years from 2022. Transitional arrangements for LDPs set out that Ministers expect a new style plan to be adopted by local authorities within 5 years of NPF4 being adopted, 2026. Including figures to 2036 allows the flexibility for all new style plans to look ahead 10 years, whenever they are prepared in those first 5 years.
- The calculation establishes the difference in household projections between each year i.e. the number of newly-forming households.
- These are then totalled over 15 years for each authority.
- See Annex D.

Step 5 Zero the negative newly-forming households and re-calculate relevant totals

- In some authorities and for some of the years, household projections go negative where population decline is occurring.
- Negative figures are changed to 0.
- This approach is to ensure that land supply is not underestimated.
- See Annex E.
- Authorities and figures affected are shown in blue.

Step 6 Subtract the national park Housing Markets Areas (HMAs) household projections from the relevant local authorities and re-calculate the local authority totals

- National park authorities have responsibility for land use planning within park boundaries, including planning for housing.
- This subtraction is to ensure each authority plans for their own area outwith the parks, rather than overestimate for local authorities that overlap national parks.
- See Annex F.
- Authorities and figures affected are shown in blue.

Step 7 Subtract the national park Housing Markets Areas (HMAs) existing housing need from the relevant local authorities and re-calculate the local authority totals

- This mirrors step 5 but addresses the existing housing need aspect.
- See Annex G.
- Authorities and figures affected are shown in blue.

Step 8 Add the re-calculated newly-forming households data (steps 6) to the re-calculated existing housing need data (step 7)

- Summing the re-calculated data results in a 15 year default figure
- See Annex H.

Step 9 Annualise the re-calculated figures

- As plans are to look forward 10 years, the figures from step 8 are divided by 15 to reach an average annual default figure.
- Only the newly-forming households are annualised, not the existing need as all of this goes into the calculation.
- See Annex I.

Step 10 Create a 10 year default figure

- The annualised figures are multiplied by 10 to provide a 10 year total that aligns with the period LDPs will plan ahead for.
- The accuracy of data reduces the further in advance it is projected. Annualising the figure in this way is considered the more robust approach.
- See Annex J.

Step 11 Present a single figure for national parks

- Figures will be presented in NPF4 for each Local Authority and National Park area.
- The individual Housing Market Areas figures for National Parks are therefore removed, with the single figure remaining.
- See Annex K.

Step 12 Re-order authorities

- Authorities may wish to work individually or within regional groupings.
- The authorities are therefore presented within groups that have worked together previously on a statutory basis.
- Fife previously worked across two statutory strategic plans. Data is therefore provided which represents around 20% of the Fife (North) households being located in the Dundee City Region and around 80% of the Fife (Central and South) households being located in the Edinburgh City Region. A single figure for Fife is also provided.
- See Annex L.

Step 13 Add flexibility allowance

- Step 3 provides an explanation of the flexibility allowance.
- See Annex M.

Step 14 Round figures to nearest 50, calculate Minimum All-Tenure Housing Land Requirement and present completions information

- Figures are rounded to the nearest 50 to reflect the more flexible and indicative approach to housing land intended for the future.
- Completions data is provided to support the expectation that explicit reference will be made to them in local considerations. The completions data is from [Scottish Government NB1 and NB2 returns and Housing Association new build information from Scottish Government Housing Investment Division: Affordable Housing Investment Programme](#).
- See Annex N.

Annex A – Step 1: Raw Data from the National Records of Scotland 2018 Household Projections

Local Authority, National Park and NP Housing Market Areas	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037
Aberdeen City	109,300	109,568	109,831	110,075	110,355	110,629	110,884	111,201	111,536	111,946	112,321	112,729	113,134	113,546	113,938	114,285
Aberdeenshire	114,079	114,904	115,675	116,324	116,869	117,363	117,844	118,325	118,756	119,178	119,499	119,878	120,221	120,527	120,844	121,142
Angus	54,621	54,813	54,959	55,050	55,122	55,126	55,189	55,226	55,223	55,244	55,250	55,272	55,295	55,328	55,353	55,386
Argyll & Bute	41,608	41,523	41,440	41,290	41,170	40,990	40,803	40,640	40,458	40,292	40,121	39,961	39,808	39,656	39,519	39,370
Clackmannanshire	24,138	24,217	24,278	24,332	24,362	24,364	24,384	24,398	24,408	24,399	24,395	24,392	24,385	24,380	24,387	24,403
Dumfries & Galloway	69,930	69,987	70,004	70,025	69,967	69,906	69,869	69,800	69,727	69,647	69,541	69,477	69,423	69,377	69,353	69,331
Dundee City	71,267	71,358	71,388	71,427	71,434	71,484	71,581	71,701	71,808	71,958	72,158	72,360	72,536	72,708	72,878	73,048
East Ayrshire	55,757	55,818	55,842	55,837	55,796	55,726	55,695	55,649	55,579	55,514	55,499	55,443	55,396	55,345	55,328	55,280
East Dunbartonshire	46,917	47,145	47,366	47,584	47,808	47,952	48,168	48,381	48,612	48,858	49,129	49,377	49,648	49,877	50,145	50,393
East Lothian	48,218	48,702	49,124	49,565	50,009	50,443	50,821	51,259	51,682	52,116	52,575	53,018	53,444	53,866	54,332	54,768
East Renfrewshire	40,305	40,617	40,926	41,216	41,495	41,815	42,139	42,443	42,777	43,116	43,463	43,780	44,088	44,390	44,699	45,018
Edinburgh City	246,540	248,841	251,104	253,223	255,255	257,284	259,245	261,254	263,156	265,129	267,080	269,040	270,980	272,809	274,672	276,397
Eilean Siar	12,775	12,727	12,694	12,649	12,599	12,539	12,478	12,411	12,338	12,253	12,194	12,119	12,066	11,994	11,918	11,866
Falkirk	74,176	74,658	75,105	75,554	75,966	76,319	76,692	77,029	77,395	77,772	78,144	78,502	78,869	79,224	79,585	79,926
Fife	171,156	171,748	172,314	172,711	173,078	173,335	173,621	173,988	174,274	174,634	174,885	175,187	175,506	175,813	176,110	176,338
Glasgow City	300,830	302,367	303,712	304,948	306,221	307,450	308,678	309,926	311,191	312,651	314,075	315,542	317,022	318,412	319,962	321,447
Highland	111,067	111,657	112,181	112,633	113,007	113,383	113,704	114,016	114,239	114,495	114,699	114,878	115,072	115,280	115,501	115,719
Inverclyde	37,340	37,198	37,076	36,943	36,792	36,607	36,433	36,258	36,122	35,961	35,800	35,618	35,469	35,340	35,198	35,046
Midlothian	41,685	42,318	42,979	43,594	44,213	44,796	45,374	45,968	46,542	47,115	47,709	48,280	48,856	49,432	50,013	50,591
Moray	43,669	43,868	44,071	44,228	44,398	44,520	44,649	44,765	44,848	44,936	45,028	45,141	45,222	45,313	45,415	45,527
North Ayrshire	64,257	64,268	64,240	64,189	64,113	64,007	63,889	63,757	63,574	63,464	63,318	63,168	63,061	62,909	62,796	62,684
North Lanarkshire	154,607	155,185	155,785	156,256	156,653	157,072	157,469	157,891	158,249	158,660	159,042	159,414	159,784	160,130	160,504	160,862
Orkney Islands	10,774	10,830	10,875	10,914	10,952	10,981	11,010	11,024	11,036	11,068	11,089	11,104	11,128	11,159	11,188	11,203
Perth Kinross	70,140	70,506	70,835	71,100	71,314	71,499	71,711	71,858	72,003	72,154	72,284	72,437	72,611	72,732	72,890	73,051
Renfrewshire	88,474	88,913	89,298	89,622	89,968	90,259	90,601	90,926	91,264	91,604	91,961	92,380	92,736	93,065	93,488	93,875
Scottish Borders	55,465	55,712	55,920	56,104	56,254	56,339	56,443	56,544	56,661	56,770	56,900	56,996	57,110	57,200	57,305	57,366
Shetland Islands	10,566	10,612	10,644	10,674	10,706	10,735	10,742	10,753	10,764	10,770	10,766	10,758	10,751	10,738	10,738	10,732
South Ayrshire	52,978	53,032	53,094	53,113	53,095	53,081	53,063	53,069	53,043	53,012	52,987	52,947	52,913	52,872	52,864	52,807
South Lanarkshire	149,931	150,609	151,251	151,812	152,297	152,793	153,273	153,814	154,262	154,785	155,297	155,802	156,351	156,888	157,457	157,999
Stirling	40,765	41,070	41,377	41,633	41,892	42,129	42,384	42,629	42,849	43,072	43,324	43,567	43,818	44,084	44,352	44,616
West Dunbartonshire	43,223	43,233	43,224	43,222	43,192	43,172	43,156	43,130	43,111	43,098	43,075	43,074	43,059	43,035	43,009	42,971
West Lothian	81,415	82,214	82,991	83,688	84,357	85,008	85,634	86,267	86,842	87,463	88,049	88,657	89,312	89,903	90,530	91,130
Cairngorms National Park ^{1,2}	8,868	8,964	9,055	9,144	9,237	9,318	9,388	9,467	9,526	9,582	9,620	9,655	9,689	9,727	9,761	9,805
> Aberdeenshire HMA	1,585	1,605	1,624	1,642	1,661	1,677	1,691	1,707	1,720	1,732	1,740	1,749	1,757	1,765	1,772	1,781
> Highland HMA	6,912	6,985	7,053	7,121	7,191	7,253	7,306	7,366	7,409	7,451	7,480	7,504	7,529	7,558	7,583	7,616
> Moray HMA	370	374	378	381	385	388	391	394	396	399	400	402	403	405	406	408
Loch Lomond and the Trossachs National Park ^{1,3}	6,757	6,771	6,787	6,792	6,802	6,811	6,816	6,822	6,821	6,834	6,825	6,811	6,814	6,829	6,832	6,833
> Argyll & Bute HMA	1,335	1,329	1,324	1,316	1,310	1,303	1,294	1,287	1,278	1,272	1,261	1,250	1,243	1,237	1,229	1,221
> Stirling HMA	4,103	4,125	4,148	4,164	4,183	4,202	4,218	4,235	4,247	4,267	4,274	4,277	4,292	4,314	4,329	4,343
> West Dunbartonshire HMA	1,320	1,317	1,315	1,312	1,309	1,306	1,303	1,300	1,296	1,295	1,289	1,283	1,280	1,278	1,274	1,269

Sources:

> Local Authority figures - 2018-based Household Projection, National Records for Scotland, published September 2020.

> National Park figures - 2018 occupied households, National Records of Scotland, published October 2020 and the Scottish Government HNDA Tool v4.0 published November 2020.

Annex A – Step 1: Raw Data from the National Records of Scotland 2018 Household Projections

Notes:
1. The number of occupied households in each park and each local authority is derived for 2018. For each local authority area within the park the proportion of total households within the park is derived. This proportion is then applied to the local authority household projection to derive a household projection for the whole park and the Housing Market Areas (HMAs) within the Park (the latter are also used further on in the process). The HMAs are used to estimate the household projection for the whole park. Then the proportion of each HMA sub-area of the total is derived. These proportion are then applied to the NRS household projections for the park as a whole (which NRS do produce). The HMA sub-areas are then summed to total.
2. Whilst Angus Council and Perth and Kinross Council are part of the Park, these data zones are mainly on the Council side of the Park Border and cannot be included for the purposes of the HNDA Tool as data zones cannot be split statistical reasons. The data zones we cannot included for Angus are (S01000708), (S01000710) and for Perth and Kinross are (S01005145), (S01005146) and (S01005417).
3. Two data zones in Perth & Kinross cross into the Park boundary (S01005073) and (S01005002) but these data zones are mainly on the Council side of the Park Border and cannot be included for the purposes of the HNDA Tool as data zones can't be split for statistical reasons.

Annex B – Step 2: Raw Data for Existing Housing Need

Local Authority, National Park and NP Housing Market Areas	Homeless Households in Temporary Accommodation and Households both Concealed and Overcrowded
Aberdeen City	479
Aberdeenshire	401
Angus	157
Argyll & Bute	148
Clackmannanshire	145
Dumfries & Galloway	265
Dundee City	395
East Ayrshire	196
East Dunbartonshire	245
East Lothian	478
East Renfrewshire	97
Edinburgh, City of	2,140
Eilean Siar	69
Falkirk	371
Fife	740
Glasgow City	3,410
Highland	740
Inverclyde	176
Midlothian	480
Moray	180
North Ayrshire	368
North Lanarkshire	921
Orkney Islands	49
Perth & Kinross	117
Renfrewshire	309
Scottish Borders	103
Shetland Islands	98
South Ayrshire	314
South Lanarkshire	844
Stirling	309
West Dunbartonshire	341
West Lothian	582
Cairngorms National Park	52
> Aberdeenshire HMA	5
> Highland HMA	45
> Moray HMA	1
Loch Lomond and the Trossachs National Park	48
> Argyll & Bute HMA	5
> Stirling HMA	32
> West Dunbartonshire HMA	11

Sources:

> Homeless households in temporary accommodation – Scottish Government Homelessness Statistics (2020)

> Overcrowded and concealed households – Scottish House Condition Survey and (2016-18) and Scotland’s Census (2011)

Annex C – Step 3: Identify Flexibility Allowance

Local Authority, National Park and NP Housing Market Areas	Urban or Rural (in accordance with the ‘Randall’ Classification)	Flexibility Allowance (Rural Authorities Shaded)
Aberdeen City	Urban	0.25 or 25%
Aberdeenshire	Rural	0.30 or 30%
Angus	Rural	0.30 or 30%
Argyll & Bute	Rural	0.30 or 30%
Clackmannanshire	Urban	0.25 or 25%
Dumfries & Galloway	Rural	0.30 or 30%
Dundee City	Urban	0.25 or 25%
East Ayrshire	Rural	0.30 or 30%
East Dunbartonshire	Urban	0.25 or 25%
East Lothian	Urban	0.25 or 25%
East Renfrewshire	Urban	0.25 or 25%
Edinburgh, City of	Urban	0.25 or 25%
Eilean Siar	Rural	0.30 or 30%
Falkirk	Urban	0.25 or 25%
Fife	Urban	0.25 or 25%
Glasgow City	Urban	0.25 or 25%
Highland	Rural	0.30 or 30%
Inverclyde	Urban	0.25 or 25%
Midlothian	Urban	0.25 or 25%
Moray	Rural	0.30 or 30%
North Ayrshire	Urban	0.25 or 25%
North Lanarkshire	Urban	0.25 or 25%
Orkney Islands	Rural	0.30 or 30%
Perth & Kinross	Rural	0.30 or 30%
Renfrewshire	Urban	0.25 or 25%
Scottish Borders	Rural	0.30 or 30%
Shetland Islands	Rural	0.30 or 30%
South Ayrshire	Rural	0.30 or 30%
South Lanarkshire	Urban	0.25 or 25%
Stirling	Rural	0.30 or 30%
West Dunbartonshire	Urban	0.25 or 25%
West Lothian	Urban	0.25 or 25%
Cairngorms National Park	Rural	0.30 or 30%
Loch Lomond and the Trossachs National Park	Rural	0.30 or 30%

Source: Scottish Government using the Randall Classification.

Annex D: Step 4 - Number of Newly-Forming Households, 2022 to 2036

Local Authority, National Park and NP Housing Market Areas	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Aberdeen City	268	263	244	280	274	255	317	335	410	375	408	405	412	392	347	4,985
Aberdeenshire	825	771	649	545	494	481	481	431	422	321	379	343	306	317	298	7,063
Angus	192	146	91	72	4	63	37	-3	21	6	22	23	33	25	33	765
Argyll & Bute	-85	-83	-150	-120	-180	-187	-163	-182	-166	-171	-160	-153	-152	-137	-149	-2,238
Clackmannanshire	79	61	54	30	2	20	14	10	-9	-4	-3	-7	-5	7	16	265
Dumfries & Galloway	57	17	21	-58	-61	-37	-69	-73	-80	-106	-64	-54	-46	-24	-22	-599
Dundee City	91	30	39	7	50	97	120	107	150	200	202	176	172	170	170	1,781
East Ayrshire	61	24	-5	-41	-70	-31	-46	-70	-65	-15	-56	-47	-51	-17	-48	-477
East Dunbartonshire	228	221	218	224	144	216	213	231	246	271	248	271	229	268	248	3,476
East Lothian	484	422	441	444	434	378	438	423	434	459	443	426	422	466	436	6,550
East Renfrewshire	312	309	290	279	320	324	304	334	339	347	317	308	302	309	319	4,713
Edinburgh City	2,301	2,263	2,119	2,032	2,029	1,961	2,009	1,902	1,973	1,951	1,960	1,940	1,829	1,863	1,725	29,857
Eilean Siar	-48	-33	-45	-50	-60	-61	-67	-73	-85	-59	-75	-53	-72	-76	-52	-909
Falkirk	482	447	449	412	353	373	337	366	377	372	358	367	355	361	341	5,750
Fife	592	566	397	367	257	286	367	286	360	251	302	319	307	297	228	5,182
Glasgow City	1,537	1,345	1,236	1,273	1,229	1,228	1,248	1,265	1,460	1,424	1,467	1,480	1,390	1,550	1,485	20,617
Highland	590	524	452	374	376	321	312	223	256	204	179	194	208	221	218	4,652
Inverclyde	-142	-122	-133	-151	-185	-174	-175	-136	-161	-161	-182	-149	-129	-142	-152	-2,294
Midlothian	633	661	615	619	583	578	594	574	573	594	571	576	576	581	578	8,906
Moray	199	203	157	170	122	129	116	83	88	92	113	81	91	102	112	1,858
North Ayrshire	11	-28	-51	-76	-106	-118	-132	-183	-110	-146	-150	-107	-152	-113	-112	-1,573
North Lanarkshire	578	600	471	397	419	397	422	358	411	382	372	370	346	374	358	6,255
Orkney Islands	56	45	39	38	29	29	14	12	32	21	15	24	31	29	15	429
Perth & Kinross	366	329	265	214	185	212	147	145	151	130	153	174	121	158	161	2,911
Renfrewshire	439	385	324	346	291	342	325	338	340	357	419	356	329	423	387	5,401
Scottish Borders	247	208	184	150	85	104	101	117	109	130	96	114	90	105	61	1,901
Shetland Islands	46	32	30	32	29	7	11	11	6	-4	-8	-7	-13	0	-6	166
South Ayrshire	54	62	19	-18	-14	-18	6	-26	-31	-25	-40	-34	-41	-8	-57	-171
South Lanarkshire	678	642	561	485	496	480	541	448	523	512	505	549	537	569	542	8,068
Stirling	305	307	256	259	237	255	245	220	223	252	243	251	266	268	264	3,851
West Dunbartonshire	10	-9	-2	-30	-20	-16	-26	-19	-13	-23	-1	-15	-24	-26	-38	-252
West Lothian	799	777	697	669	651	626	633	575	621	586	608	655	591	627	600	9,715
Cairngorms National Park ¹	96	91	89	93	81	70	79	59	56	38	35	34	38	34	44	937
> Aberdeenshire HMA	20	19	18	19	16	14	16	13	12	8	9	8	8	7	9	195
> Highland HMA	73	68	67	71	62	53	60	44	42	28	25	25	28	25	33	704
> Moray HMA	4	4	3	4	3	3	3	2	2	2	2	1	2	1	2	38
Loch Lomond and the Trossachs National Park ¹	14	16	5	10	9	5	6	-1	13	-9	-14	3	15	3	1	76
> Argyll & Bute HMA	-6	-5	-8	-6	-7	-9	-8	-9	-6	-11	-11	-8	-6	-8	-8	-113
> Stirling HMA	22	24	16	19	19	17	17	12	20	8	3	14	23	15	14	240
> West Dunbartonshire HMA	-2	-3	-3	-3	-2	-3	-3	-4	-1	-6	-6	-4	-2	-4	-5	-51

Annex E: Step 5 – Zeroing of the Negative Newly-Forming Households and Re-calculation of Relevant Totals

Local Authority, National Park and NP Housing Market Areas	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Aberdeen City	268	263	244	280	274	255	317	335	410	375	408	405	412	392	347	4,985
Aberdeenshire	825	771	649	545	494	481	481	431	422	321	379	343	306	317	298	7,063
Angus	192	146	91	72	4	63	37	0	21	6	22	23	33	25	33	768
Argyll & Bute	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Clackmannanshire	79	61	54	30	2	20	14	10	0	0	0	0	0	7	16	293
Dumfries & Galloway	57	17	21	0	0	0	0	0	0	0	0	0	0	0	0	95
Dundee City	91	30	39	7	50	97	120	107	150	200	202	176	172	170	170	1,781
East Ayrshire	61	24	0	0	0	0	0	0	0	0	0	0	0	0	0	85
East Dunbartonshire	228	221	218	224	144	216	213	231	246	271	248	271	229	268	248	3,476
East Lothian	484	422	441	444	434	378	438	423	434	459	443	426	422	466	436	6,550
East Renfrewshire	312	309	290	279	320	324	304	334	339	347	317	308	302	309	319	4,713
Edinburgh City	2,301	2,263	2,119	2,032	2,029	1,961	2,009	1,902	1,973	1,951	1,960	1,940	1,829	1,863	1,725	29,857
Eilean Siar	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Falkirk	482	447	449	412	353	373	337	366	377	372	358	367	355	361	341	5,750
Fife	592	566	397	367	257	286	367	286	360	251	302	319	307	297	228	5,182
Glasgow City	1,537	1,345	1,236	1,273	1,229	1,228	1,248	1,265	1,460	1,424	1,467	1,480	1,390	1,550	1,485	20,617
Highland	590	524	452	374	376	321	312	223	256	204	179	194	208	221	218	4,652
Inverclyde	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Midlothian	633	661	615	619	583	578	594	574	573	594	571	576	576	581	578	8,906
Moray	199	203	157	170	122	129	116	83	88	92	113	81	91	102	112	1,858
North Ayrshire	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11
North Lanarkshire	578	600	471	397	419	397	422	358	411	382	372	370	346	374	358	6,255
Orkney Islands	56	45	39	38	29	29	14	12	32	21	15	24	31	29	15	429
Perth Kinross	366	329	265	214	185	212	147	145	151	130	153	174	121	158	161	2,911
Renfrewshire	439	385	324	346	291	342	325	338	340	357	419	356	329	423	387	5,401
Scottish Borders	247	208	184	150	85	104	101	117	109	130	96	114	90	105	61	1,901
Shetland Islands	46	32	30	32	29	7	11	11	6	0	0	0	0	0	0	204
South Ayrshire	54	62	19	0	0	0	6	0	0	0	0	0	0	0	0	141
South Lanarkshire	678	642	561	485	496	480	541	448	523	512	505	549	537	569	542	8,068
Stirling	305	307	256	259	237	255	245	220	223	252	243	251	266	268	264	3,851
West Dunbartonshire	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
West Lothian	799	777	697	669	651	626	633	575	621	586	608	655	591	627	600	9,715
Cairngorms National Park	96	91	89	93	81	70	79	59	56	38	35	34	38	34	44	937
> Aberdeenshire HMA	20	19	18	19	16	14	16	13	12	8	9	8	8	7	9	195
> Highland HMA	73	68	67	71	62	53	60	44	42	28	25	25	28	25	33	704
> Moray HMA	4	4	3	4	3	3	3	2	2	2	2	1	2	1	2	38
Loch Lomond and the Trossachs National Park	22	24	16	19	19	17	17	12	20	8	3	14	23	15	14	240
> Argyll & Bute HMA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
> Stirling HMA	22	24	16	19	19	17	17	12	20	8	3	14	23	15	14	240
> West Dunbartonshire HMA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Annex F: Step 6 – Subtraction of National Park Housing Markets Area (HMAs) Household Projections from Relevant Local Authorities and Re-calculation of Local Authority Totals

Local Authority, National Park and NP Housing Market Areas	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	Total
Aberdeen City	268	263	244	280	274	255	317	335	410	375	408	405	412	392	347	4,985
Aberdeenshire	805	752	631	526	478	467	465	418	410	313	370	335	298	310	289	6,868
Angus	192	146	91	72	4	63	37	0	21	6	22	23	33	25	33	768
Argyll & Bute	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Clackmannanshire	79	61	54	30	2	20	14	10	0	0	0	0	0	7	16	293
Dumfries Galloway	57	17	21	0	0	0	0	0	0	0	0	0	0	0	0	95
Dundee City	91	30	39	7	50	97	120	107	150	200	202	176	172	170	170	1,781
East Ayrshire	61	24	0	0	0	0	0	0	0	0	0	0	0	0	0	85
East Dunbartonshire	228	221	218	224	144	216	213	231	246	271	248	271	229	268	248	3,476
East Lothian	484	422	441	444	434	378	438	423	434	459	443	426	422	466	436	6,550
East Renfrewshire	312	309	290	279	320	324	304	334	339	347	317	308	302	309	319	4,713
Edinburgh City	2,301	2,263	2,119	2,032	2,029	1,961	2,009	1,902	1,973	1,951	1,960	1,940	1,829	1,863	1,725	29,857
Eilean Siar	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Falkirk	482	447	449	412	353	373	337	366	377	372	358	367	355	361	341	5,750
Fife	592	566	397	367	257	286	367	286	360	251	302	319	307	297	228	5,182
Glasgow City	1,537	1,345	1,236	1,273	1,229	1,228	1,248	1,265	1,460	1,424	1,467	1,480	1,390	1,550	1,485	20,617
Highland	517	456	385	303	314	268	252	179	214	176	154	169	180	196	185	3,948
Inverclyde	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Midlothian	633	661	615	619	583	578	594	574	573	594	571	576	576	581	578	8,906
Moray	195	199	154	166	119	126	113	81	86	90	111	80	89	101	110	1,820
North Ayrshire	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11
North Lanarkshire	578	600	471	397	419	397	422	358	411	382	372	370	346	374	358	6,255
Orkney Islands	56	45	39	38	29	29	14	12	32	21	15	24	31	29	15	429
Perth & Kinross	366	329	265	214	185	212	147	145	151	130	153	174	121	158	161	2,911
Renfrewshire	439	385	324	346	291	342	325	338	340	357	419	356	329	423	387	5,401
Scottish Borders	247	208	184	150	85	104	101	117	109	130	96	114	90	105	61	1,901
Shetland Islands	46	32	30	32	29	7	11	11	6	0	0	0	0	0	0	204
South Ayrshire	54	62	19	0	0	0	6	0	0	0	0	0	0	0	0	141
South Lanarkshire	678	642	561	485	496	480	541	448	523	512	505	549	537	569	542	8,068
Stirling	283	283	240	240	218	238	228	208	203	244	240	237	243	253	250	3,611
West Dunbartonshire	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
West Lothian	799	777	697	669	651	626	633	575	621	586	608	655	591	627	600	9,715
Cairngorms National Park	96	91	89	93	81	70	79	59	56	38	35	34	38	34	44	937
> Aberdeenshire HMA	20	19	18	19	16	14	16	13	12	8	9	8	8	7	9	195
> Highland HMA	73	68	67	71	62	53	60	44	42	28	25	25	28	25	33	704
> Moray HMA	4	4	3	4	3	3	3	2	2	2	2	1	2	1	2	38
Loch Lomond and the Trossachs National Park	22	24	16	19	19	17	17	12	20	8	3	14	23	15	14	240
> Argyll & Bute HMA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
> Stirling HMA	22	24	16	19	19	17	17	12	20	8	3	14	23	15	14	240
> West Dunbartonshire HMA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Annex G: Step 7 - Subtraction of National Park Housing Markets Area (HMAs) Existing Need from Relevant Local Authorities and Re-calculation of Local Authority Totals

Local Authority, National Park and NP Housing Market Areas	HoTOC Total
Aberdeen City	479
Aberdeenshire	395
Angus	157
Argyll & Bute	143
Clackmannanshire	145
Dumfries & Galloway	265
Dundee City	395
East Ayrshire	196
East Dunbartonshire	245
East Lothian	478
East Renfrewshire	97
Edinburgh, City of	2,140
Eilean Siar	69
Falkirk	371
Fife	740
Glasgow City	3,410
Highland	695
Inverclyde	176
Midlothian	480
Moray	179
North Ayrshire	368
North Lanarkshire	921
Orkney Islands	49
Perth & Kinross	117
Renfrewshire	309
Scottish Borders	103
Shetland Islands	98
South Ayrshire	314
South Lanarkshire	844
Stirling	277
West Dunbartonshire	330
West Lothian	582
Cairngorms National Park	52
> Aberdeenshire HMA	5
> Highland HMA	45
> Moray HMA	1
Loch Lomond and the Trossachs National Park	48
> Argyll & Bute HMA	5
> Stirling HMA	32
> West Dunbartonshire HMA	11

Annex H: Step 8 - Add Re-calculated Newly Forming Household Data (steps 6) to the Re-calculated Existing Need Data (step 7)

Local Authority, National Park and NP Housing Market Areas	Total 2022 to 2036		
	Existing Housing Need (a)	Newly Forming Households (b)	15 year Default Figure (a) + (b)
Aberdeen City	479	4,985	5,464
Aberdeenshire	395	6,868	7,263
Angus	157	768	925
Argyll & Bute	143	0	143
Clackmannanshire	145	293	438
Dumfries & Galloway	265	95	360
Dundee City	395	1,781	2,176
East Ayrshire	196	85	281
East Dunbartonshire	245	3,476	3,721
East Lothian	478	6,550	7,028
East Renfrewshire	97	4,713	4,810
Edinburgh, City of	2,140	29,857	31,997
Eilean Siar	69	0	69
Falkirk	371	5,750	6,121
Fife	740	5,182	5,922
Glasgow City	3,410	20,617	24,027
Highland	695	3,948	4,643
Inverclyde	176	0	176
Midlothian	480	8,906	9,386
Moray	179	1,820	1,999
North Ayrshire	368	11	379
North Lanarkshire	921	6,255	7,176
Orkney Islands	49	429	478
Perth & Kinross	117	2,911	3,028
Renfrewshire	309	5,401	5,710
Scottish Borders	103	1,901	2,004
Shetland Islands	98	204	302
South Ayrshire	314	141	455
South Lanarkshire	844	8,068	8,912
Stirling	277	3,611	3,888
West Dunbartonshire	330	10	340
West Lothian	582	9,715	10,297
Cairngorms National Park	52	937	989
> Aberdeenshire HMA	5	195	201
> Highland HMA	45	704	749
> Moray HMA	1	38	39
Loch Lomond and the Trossachs National Park	48	240	288
> Argyll & Bute HMA	5	0	5
> Stirling HMA	32	240	272
> West Dunbartonshire HMA	11	0	11

Annex I: Step 9 – Annualise Figures

Local Authority, National Park and NP Housing Market Areas	Annualised		
	Existing Housing Need	Newly Forming Households	Annualised 15 year Default Figure
Aberdeen City	479	332	811
Aberdeenshire	395	458	853
Angus	157	51	208
Argyll & Bute	143	0	143
Clackmannanshire	145	20	164
Dumfries & Galloway	265	6	271
Dundee City	395	119	513
East Ayrshire	196	6	201
East Dunbartonshire	245	232	477
East Lothian	478	437	915
East Renfrewshire	97	314	411
Edinburgh, City of	2,140	1,990	4,130
Eilean Siar	69	0	69
Falkirk	371	383	755
Fife	740	345	1,085
Glasgow City	3,410	1,374	4,785
Highland	695	263	958
Inverclyde	176	0	176
Midlothian	480	594	1,073
Moray	179	121	300
North Ayrshire	368	1	369
North Lanarkshire	921	417	1,338
Orkney Islands	49	29	77
Perth & Kinross	117	194	312
Renfrewshire	309	360	669
Scottish Borders	103	127	230
Shetland Islands	98	14	112
South Ayrshire	314	9	323
South Lanarkshire	844	538	1,382
Stirling	277	241	518
West Dunbartonshire	330	1	331
West Lothian	582	648	1,230
Cairngorms National Park	52	62	114
> Aberdeenshire HMA	5	13	18
> Highland HMA	45	47	92
> Moray HMA	1	3	4
Loch Lomond and the Trossachs National Park	48	16	64
> Argyll & Bute HMA	5	0	5
> Stirling HMA	32	16	48
> West Dunbartonshire HMA	11	0	11

Annex J: Step 10 – Creation of 10 year Default Figure

Local Authority, National Park and NP Housing Market Areas	10 Year Total		
	Existing Housing Need	Newly Forming Households	10 year Default Figure
Aberdeen City	479	3,323	3,802
Aberdeenshire	395	4,579	4,974
Angus	157	512	669
Argyll & Bute	143	0	143
Clackmannanshire	145	195	340
Dumfries & Galloway	265	63	328
Dundee City	395	1,187	1,582
East Ayrshire	196	57	252
East Dunbartonshire	245	2,317	2,563
East Lothian	478	4,367	4,845
East Renfrewshire	97	3,142	3,239
Edinburgh, City of	2,140	19,905	22,044
Eilean Siar	69	0	69
Falkirk	371	3,833	4,205
Fife	740	3,455	4,195
Glasgow City	3,410	13,745	17,155
Highland	695	2,632	3,327
Inverclyde	176	0	176
Midlothian	480	5,937	6,417
Moray	179	1,213	1,392
North Ayrshire	368	7	375
North Lanarkshire	921	4,170	5,091
Orkney Islands	49	286	335
Perth & Kinross	117	1,941	2,058
Renfrewshire	309	3,601	3,909
Scottish Borders	103	1,267	1,370
Shetland Islands	98	136	234
South Ayrshire	314	94	408
South Lanarkshire	844	5,379	6,223
Stirling	277	2,407	2,684
West Dunbartonshire	330	7	337
West Lothian	582	6,477	7,059
Cairngorms National Park	52	625	677
> Aberdeenshire HMA	5	130	135
> Highland HMA	45	469	514
> Moray HMA	1	25	27
Loch Lomond and the Trossachs National Park	48	160	208
> Argyll & Bute HMA	5	0	5
> Stirling HMA	32	160	192
> West Dunbartonshire HMA	11	0	11

Annex K: Step 11 – Present a Single Figure for National Parks

Local Authority, National Park and NP Housing Market Areas	10 Year Total		
	Existing Housing Need	Newly Forming Households	10 year Default Figure Single Figure for National Parks
Aberdeen City	479	3,323	3,802
Aberdeenshire	395	4,579	4,974
Angus	157	512	669
Argyll & Bute	143	0	143
Clackmannanshire	145	195	340
Dumfries & Galloway	265	63	328
Dundee City	395	1,187	1,582
East Ayrshire	196	57	252
East Dunbartonshire	245	2,317	2,563
East Lothian	478	4,367	4,845
East Renfrewshire	97	3,142	3,239
Edinburgh, City of	2,140	19,905	22,044
Eilean Siar	69	0	69
Falkirk	371	3,833	4,205
Fife	740	3,455	4,195
Glasgow City	3,410	13,745	17,155
Highland	695	2,632	3,327
Inverclyde	176	0	176
Midlothian	480	5,937	6,417
Moray	179	1,213	1,392
North Ayrshire	368	7	375
North Lanarkshire	921	4,170	5,091
Orkney Islands	49	286	335
Perth & Kinross	117	1,941	2,058
Renfrewshire	309	3,601	3,909
Scottish Borders	103	1,267	1,370
Shetland Islands	98	136	234
South Ayrshire	314	94	408
South Lanarkshire	844	5,379	6,223
Stirling	277	2,407	2,684
West Dunbartonshire	330	7	337
West Lothian	582	6,477	7,059
Cairngorms National Park	52	625	677
Loch Lomond and the Trossachs National Park	48	160	208

Annex L: Step 12 – Re-Ordering the Presentation of the Authorities

Local Authorities, City Regions and National Parks	10 Year Total		
	Existing Housing Need	Newly-Forming Households	10 year Default Figure
Aberdeen City	479	3,323	3,802
Aberdeenshire	395	4,579	4,974
Aberdeen City Region	874	7,902	8,776
Angus	157	512	669
Fife (North)	148	691	839
Dundee City	395	1,187	1,582
Perth and Kinross	117	1,941	2,058
Dundee City Region	817	4,331	5,148
City of Edinburgh	2,140	19,905	22,044
East Lothian	478	4,367	4,845
Fife (Central and South)	592	2,764	3,356
Midlothian	480	5,937	6,417
West Lothian	582	6,477	7,059
Scottish Borders	103	1,267	1,370
Edinburgh City Region	4,374	40,716	45,091
East Dunbartonshire	245	2,317	2,563
East Renfrewshire	97	3,142	3,239
Glasgow City	3,410	13,745	17,155
Inverclyde	176	0	176
North Lanarkshire	921	4,170	5,091
Renfrewshire	309	3,601	3,909
South Lanarkshire	844	5,379	6,223
West Dunbartonshire	330	7	337
Glasgow City Region	6,332	32,360	38,692
Argyll and Bute	143	0	143
Clackmannanshire	145	195	340
Dumfries and Galloway	265	63	328
East Ayrshire	196	57	252
Eilean Siar	69	0	69
Falkirk	371	3,833	4,205
Highland	695	2,632	3,327
Moray	179	1,213	1,392
North Ayrshire	368	7	375
Orkney	49	286	335
Shetland	98	136	234
South Ayrshire	314	94	408
Stirling	277	2,407	2,684
All Fife	740	3,455	4,195
Cairngorms National Park	52	625	677
Loch Lomond and the Trossachs National Park	48	160	208

Annex M: Step 13 – Addition of Flexibility Allowance

Local Authorities, City Regions and National Parks	10 Year Total ¹					
	Existing Housing Need ² (a)	Newly-Forming Households ³ (b)	10 year Default Figure (a+b) = (c)	Flexibility Allowance (d)	Flexibility Allowance (c) x (d) = (e)	10 year Default Figure with Flexibility Allowance Added (c) + (e)
Aberdeen City	479	3,323	3,802	0.25	951	4,753
Aberdeenshire	395	4,579	4,974	0.30	1,492	6,466
Aberdeen City Region	874	7,902	8,776	n.a.	2,443	11,219
Angus	157	512	669	0.30	201	869
Fife (North) ⁴	148	691	839	0.25	210	1,049
Dundee City	395	1,187	1,582	0.25	395	1,977
Perth and Kinross	117	1,941	2,058	0.30	617	2,676
Dundee City Region	817	4,331	5,148	n.a.	1,423	6,571
City of Edinburgh	2,140	19,905	22,044	0.25	5,511	27,555
East Lothian	478	4,367	4,845	0.25	1,211	6,056
Fife (Central and South) ⁴	592	2,764	3,356	0.25	839	4,195
Midlothian	480	5,937	6,417	0.25	1,604	8,021
West Lothian	582	6,477	7,059	0.25	1,765	8,823
Scottish Borders	103	1,267	1,370	0.30	411	1,781
Edinburgh City Region	4,374	40,716	45,091	n.a.	11,341	56,432
East Dunbartonshire	245	2,317	2,563	0.25	641	3,203
East Renfrewshire	97	3,142	3,239	0.25	810	4,049
Glasgow City	3,410	13,745	17,155	0.25	4,289	21,444
Inverclyde	176	0	176	0.25	44	220
North Lanarkshire	921	4,170	5,091	0.25	1,273	6,364
Renfrewshire	309	3,601	3,909	0.25	977	4,887
South Lanarkshire	844	5,379	6,223	0.25	1,556	7,778
West Dunbartonshire	330	7	337	0.25	84	421
Glasgow City Region	6,332	32,360	38,692	n.a.	9,673	48,366
Argyll and Bute	143	0	143	0.30	43	186
Clackmannanshire	145	195	340	0.25	85	425
Dumfries and Galloway	265	63	328	0.30	98	426
East Ayrshire	196	57	252	0.30	76	328
Eilean Siar	69	0	69	0.30	21	90
Falkirk	371	3,833	4,205	0.25	1,051	5,256
Highland	695	2,632	3,327	0.30	998	4,325
Moray	179	1,213	1,392	0.30	418	1,810
North Ayrshire	368	7	375	0.25	94	469
Orkney	49	286	335	0.30	100	435
Shetland	98	136	234	0.30	70	304
South Ayrshire	314	94	408	0.30	122	530
Stirling	277	2,407	2,684	0.25	671	3,355
All Fife ⁴	740	3,455	4,195	0.25	1,049	5,243
Cairngorms National Park ^{5,6}	52	625	677	0.30	203	880
Loch Lomond and the Trossachs National Park ^{5,7}	48	160	208	0.30	62	271

Annex M: Step 13 – Addition of Flexibility Allowance

Sources:

Newly-forming households:

- > 2018-based household projections (National Records of Scotland).
- > Occupied dwellings 2018 (National Records of Scotland).

Existing Housing Need:

- > 2011 Census (National Records of Scotland)
- > Scottish Household Survey 2016-2018 (Scottish Government).
- > Homelessness Statistics as at 31 March 2020 (Scottish Government).

Newly-forming households and Existing Housing Need for the National Parks:

- > Housing Need and Demand Assessment Tool v4.0 as at November 2020 (Scottish Government).

Completions

- > NB1 and NB2 returns by local authorities to the Scottish Government.
Housing Association new build information from the Scottish Government Housing Investment Division: Affordable Housing Investment Programme.

Notes:

1. The figures are based on the 15 years of the household projection period from 2022 (when NPF4 will be adopted) to 2036, they are then annualised and multiplied by 10 years to give a 10 year total. This 15 year window of time has been used in order to accommodate any development plans that are updated after 2022. For example the 10 years minimum housing land supply can still be used in a development plan updated in 2026. Equally the 10 year minimum housing supply figures can also be used in a development plan that is updated in 2022.
2. Existing housing need comprised homeless households in temporary accommodation and households who are both overcrowded and concealed. The total count of existing housing need has been included in the above figures.
3. Over the period 2022 to 2035 several Local Authorities have negative household projections. In these cases the negative figures have been zeroed. This applies to the following authorities: Argyll and Bute, Dumfries and Galloway, East Ayrshire, , Inverclyde, Na h-Eileanan Siar, North Ayrshire, Shetland Islands, South Ayrshire, West Dunbartonshire and Loch Lomond and the Trossachs National Park.
4. Fife council is split across two City Regions for the purposes of strategic housing and planning. Around 20% of Fife (North) households are located in the Dundee City Region and 80% of Fife (Central and South) households are located in the Edinburgh City Region. This 20-80 split has been used to apportion the 'All Fife' figure above. Fife may choose to work as part of each City Region or as a Unitary Authority and therefore both figures are provided above.
5. Local Authorities are not responsible for planning in National Parks. This is the responsibility of the parks themselves. The following authorities each contain a part of Cairngorms National Park (CNP); Aberdeenshire, Highland and Moray, (Angus and Perth and Kinross). The following authorities each contain a part of the Loch Lomond and Trossachs National Park (LLTNP); Argyll and Bute, Stirling, West Dunbartonshire, (and Perth and Kinross). In these cases the national parks have been subtracted from the minimum housing land supply for the relevant Local Authorities and City Regions.
6. In order to do this it is necessary to produce figures a sub-park level for the constituent councils. However neither newly-forming household or existing housing need figures are produced at this level of disaggregation. Instead this is estimated as part of the HNDA Tool. Firstly the number of occupied dwellings is calculated for each park sub-area and each council (this is available from National Records of Scotland). The proportion of sub-area to council is then taken. The sub-area proportion is then applied to both the household projections and existing housing needs counts for each council. This then gives an sub-park estimate of newly-forming households and existing housing need.
7. It should be noted that whilst Angus Council and Perth and Kinross Council are part of the CNP, the relevant datazones are mainly on the Council side of the border with the park (in terms of number of households). In the HNDA Tool these datazones are assigned to the respective council and not the Park. This is because datazones cannot be split when they are being used for certain statistical purposes.
8. Similarly two datazones in Perth & Kinross Council cut across into the LLTNP boundary and in the HNDA Tool these are assigned to the council and not the park for the same reasons as above. For the HNDA this approach to split datazones for both parks was mutually agreed mutually by the respective councils and parks.

Annex N: Step 14 – Rounding Figures to Nearest 50, Calculate Minimum All-Tenure Housing Land Requirement and Provide Housing Completions

Local Authorities, City Regions and National Parks	s10 Years Total				Housing Completions 2010 - 2019
	Existing Housing Need	Newly-Forming Households	Flexibility Allowance (25% urban, 30% rural)	Minimum All Tenure Housing Land Requirement	
Aberdeen City	500	3,300	950	4,750	7,734
Aberdeenshire	400	4,600	1,500	6,500	12,132
Aberdeen City Region	900	7,900	2,450	11,250	19,866
Angus	150	500	200	850	2,464
Fife (North)	150	700	200	1,050	2,403
Dundee City	400	1,200	400	2,000	2,377
Perth and Kinross	100	1,950	600	2,650	5,560
Dundee City Region	800	4,350	1,400	6,550	12,804
City of Edinburgh	2,150	19,900	5,500	27,550	16,654
East Lothian	500	4,350	1,200	6,050	5,124
Fife (Central and South)	600	2,750	850	4,200	9,613
Midlothian	500	5,950	1,600	8,050	6,271
West Lothian	600	6,500	1,750	8,850	6,568
Scottish Borders	100	1,250	400	1,750	3,512
Edinburgh City Region	4,450	40,700	11,300	56,450	47,742
East Dunbartonshire	250	2,300	650	3,200	3,678
East Renfrewshire	100	3,150	800	4,050	2,999
Glasgow City	3,400	13,750	4,300	21,450	15,338
Inverclyde	200	0	50	250	2,397
North Lanarkshire	900	4,150	1,250	6,300	7,567
Renfrewshire	300	3,600	1,000	4,900	5,846
South Lanarkshire	850	5,400	1,550	7,800	11,341
West Dunbartonshire	350	0	100	450	2,601
Glasgow City Region	6,350	32,350	9,700	48,400	51,767
Argyll and Bute	150	0	50	200	2,025
Clackmannanshire	150	200	100	450	1,145
Dumfries and Galloway	250	50	100	400	2,966
East Ayrshire	200	50	100	350	3,669
Eilean Siar	50	0	0	50	1,270
Falkirk	350	3,850	1,050	5,250	4,579
Highland	700	2,650	1,000	4,350	10,300
Moray	200	1,200	400	1,800	4,514
North Ayrshire	350	0	100	450	3,123
Orkney	50	300	100	450	1,450
Shetland	100	150	50	300	993
South Ayrshire	300	100	100	500	2,400
Stirling	300	2,400	650	3,350	2,878
All Fife	750	3,450	1,050	5,250	12,016
Cairngorms National Park	50	600	200	850	n/a
Loch Lomond and the Trossachs National Park	50	150	50	250	n/a

Scottish Government Consultation on NPF4 Housing Figures Midlothian Council's Response May 2021

As NPF4 will form part of the statutory development plan for Midlothian, the Council welcomes the opportunity to engage in this important consultation and have the chance to consider any locally evidenced adjustments to the proposed housing figures. The Council's response addresses the four consultation questions set out in the Chief Planner's letter of 23 February 2021.

a. Initial Estimates and Assumptions

NPF4 will be a national spatial document (as well as a policy document) and as such the Council supports the identification of an all tenure approach to reflect the scale of the future housing need. The Council also supports the identification of a housing land requirement set by local authority area to meet local needs.

The consultation paper is clear that the proposed housing figures (6,450 new households and 8,050 unit equivalent land requirement with the 25% flexibility allowance) reflect the first two stages of the Housing Needs and Demand Assessment (HNDA) process and that further work is required to complete that process and identify what proportion of the proposed land requirement should be identified for affordable and market housing. The Council agrees with the statement in the consultation paper that issues regarding tenure will continue to be considered at the local level.

The Council is currently working with the SESplan Housing Market Partnership (HMP) to prepare a new HNDA (following the rejection of the second proposed Edinburgh and South East of Scotland Strategic Development Plan – SDP2) to inform the market and affordable housing requirements for the next Midlothian Local Development Plan (MLDP). The proposed figure for existing need is dated at March 2020. It includes an estimate of homeless households in temporary accommodation, overcrowded and concealed households (HoTOC). In preparing the new HNDA the SESplan HMP agrees, given the scale and importance of homelessness in calculating existing need across Edinburgh and the South East of Scotland, that the updated 2021 return should be used and the proposed housing figures recalculated.

The identification of “existing need” and “newly forming households” as part of the methodology is a better way of presenting the housing figures than referring to housing supply targets. In terms of the estimated number of new households, the proposed figures are broadly similar to those identified in the proposed SDP2 and the more recent interim Regional Spatial Strategy for Edinburgh and the South East of Scotland. The key difference is the increase in the flexibility allowance applied which has risen from 10% in SDP2 to 25% in NPF4. The reason given for the change is that it will reduce the risk to future delivery rates given the longer review periods for new style local development plans which will increase from five to ten years. The Council acknowledges this reasoning but considers the percentage to be somewhat arbitrary.

The proposed figures are based on the latest National Records of Scotland (NRS) Household Projections 2018 (and the Government's count of existing need) and uses the Principle projection, not the lower or higher projection figure. The Council considers that using this mid-range projection is reasonable and appropriate, particularly given the ongoing uncertainty of the long term impact and recovery from the current pandemic and Brexit. The 2018 data was published in 2020 and represents the most up to date official data available and the Centre for Housing Market Analysis (CHMA) advises the use of official statistics wherever possible as they are robust and help to ensure consistency of approach.

b. Flexibility Allowance

The proposed flexibility allowance for urban areas of 25% is more than double the proposed level of flexibility in SDP2 (10%). The Council acknowledges that the proposed review period for the new style local development plans is double what it is currently (10 years as opposed to 5 years) and that this longer period may introduce more risk in terms of sustained delivery of the housing supply targets. However, other than this there is little explanation as to why the figure is set at 25%. The Council understands and accepts the principle of including a flexibility allowance in the overall land requirement but considers the figure somewhat arbitrary. A flexibility allowance of 20%, double that of SDP2, would be more consistent with the Government's explanation for the increase.

c. Proposed Land Requirement and Past Completions

The Council welcomes the acknowledgement in the consultation document of the need to focus on the delivery of housing land. The current SESplan targets are proving to be very challenging to the house building sector to achieve. The Council acknowledges that the proposed figures are generally consistent with recent completion rates but are realistic enough to be achievable given prevailing circumstances. The proposed land requirement is also higher than that identified in SDP2 but not of such a scale which would be unrealistic or unmanageable. The Council is not anti-development and would welcome additional house building where the corresponding infrastructure and facilities to support it were in place and where the proposed scale of development did not undermine place making principles or would result in a significant adverse environmental impact on an area.

d. Case for Locally Adjusted Estimates

Until the current HNDA process is concluded and we understand what the tenure split will be between market and affordable housing, the Council is generally supportive of the Government's approach and of the proposed land requirement figure. However, the Council notes that the option to submit a locally adjusted element is restricted to upward adjustments only in apparent contradiction of the HNDA process and guidance.

The latest NRS population projections identify Midlothian as the fastest growing local authority area in Scotland, partly as a result of the current, extremely ambitious SESplan housing requirements. The scale of growth has proved challenging to

manage but delivery has not kept pace with the targets. The Council supports the proposed housing figures for Midlothian, although still challenging they are more in line with recent completion rates and similar to the housing targets identified in SESplan 2.

The Council would not want to submit any adjustments at this stage.