Perth and Kinross LDP3 2027- Evidence Report

TOPIC PAPER NO. 020: Homes

July 2024

Contents

1 Introduction

This topic paper sets out the key information about housing and land for housing in the area which will be covered by the Perth and Kinross Local Development Plan 3, as required under the provisions of Section 16B of the Act[1]. It will, alongside a range of other topic papers, contribute towards the preparation of the Council's Evidence Report, which is programmed to be submitted to the Scottish Government's Planning and Environmental Appeals Division during November 2024 for the 'Gatecheck' process.

The purpose of an Evidence Report is to provide the local authority's interpretation of the evidence it has gathered and the likely implications of that evidence for the preparation of the LDP. The Report will provide a summary of what the evidence means for the plan, rather than contain all the detail of evidence collected.

1.1 Relevant Policies

This topic is covered by the following policies in National Planning Framework 4:

- Policy 16: Quality Homes
- Policy 17: Rural Homes (part)

1.2 Legal and National Policy Requirements / Expectations

In line with the requirement of the Act, this paper will provide important background information for the Plan area regarding:

- the housing needs of the population of the area, including in particular, the needs of persons undertaking further and higher education, older people and disabled people;
- the availability of land in the district for housing, including for older people and disabled people;
- persons seeking to acquire land for self-build housing;
- the action taken to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the area, and the extent to which the action has helped to meet those needs.

Under these policies NPF4 expects LDPs to:

- Identify a Local Housing Land Requirement
- Allocate deliverable land to meet the 10-year Local Housing Land Requirement
- Identify areas which may be suitable for new homes beyond year 10
- Allocate land for Gypsy / Travellers and Travelling Showpeople where need is identified

[1] The Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2019

1.3 Perth and Kinross Council Corporate Plan 2022-2027

This topic paper links to the following priorities from the Corporate Plan:

- tackling poverty,
- tackling climate change and supporting sustainable places,
- developing a resilient, stronger and greener local economy, and
- working in partnership with communities.

There is a particular need to consider how the housing land strategy in the LDP can contribute to the following key actions / indicators from the Corporate Plan:

- Increase the supply and availability of rural housing.
- Number of new publicly available social housing units including buybacks, conversions and empty homes conversions as an indicator for mitigating the cost-of-living pressures for households experiencing and at risk of poverty.

1.4 Abbreviations used in this topic paper

CHMA	Centre for Housing Market Analysis
HLA	Housing Land Audit
HLR	Housing Land Requirement
HMA	Housing Market Area
HNDA	Housing Need and Demand Assessment
HST	Housing Supply Target
iLHLR	indicative Local Housing Land Requirement
LDP	Local Development Plan
LHS	Local Housing Strategy
MATHLR	Minimum All-Tenure Housing Land Requirement
NPF	National Planning Framework
NRS	National Records of Scotland
RSL	Registered Social Landlord
SDP	Strategic Development Plan

1.5 Data links

Links to data	Relevance of data and why it is required to inform the Proposed Plan
NPF4 Annex E Minimum All-Tenure Housing Land Requirement	Sets the Minimum All Tenure Housing Land Requirement for each authority area.
NPF4 Perth and Kinross MATHLR Assessment Report	Sets out the factors which were considered in arriving at the MATHLR for Perth and Kinross.
Perth and Kinross Housing Market Partnership Housing Need and Demand Assessment Final Report	Gives a broad, long-run estimates of what future housing need might be and provides an evidence base to inform housing policy decisions and land allocations.
Perth and Kinross Local Housing Strategy Framework 2022-27 and Action Plan	Sets out the strategic vision, policies and plans that will enable the Council and partners to deliver high quality housing and housing services to meet the needs of local people in all housing tenures.
Existing Housing Need in Perth and Kinross – Homes for Scotland commissioned report	Estimates the proportion and type of existing housing need across Perth and Kinross on a wider basis than that currently measured.
Perth and Kinross LHS 2022-2027 Appendix: Housing Supply Targets 2022+	Sets out the Council's approach to setting Housing Supply Targets which were incorporated into the Local Housing Strategy.
Perth and Kinross Strategic Housing Investment Plan	Outlines investment priorities for affordable housing which support delivery of the outcomes set out in the Local Housing Strategy.
Perth and Kinross Housing Land Audits – 2022 and 2023	Provides a statement of land supply and information on completions within Perth and Kinross.
Edinburgh City Council Housing Land Audit and Completions Programme 2022 p.11-13	Sets out Edinburgh City Council's approach to assessing the potential for increasing housing delivery.
Briefing Paper: The Barriers to Housing Delivery	Homes for Scotland publication identifying the current barriers to the delivery of more housing in Scotland.
TAYplan Strategic Development Plan 2016-36 and Examination Report	Sets the spatial strategy and the housing land requirement for the LDP.
Perth and Kinross Local Development Plan 2	Identifies sites to meet the housing land requirement set out in TAYplan and in accordance with the strategic spatial strategy.

2 Information Analysis

This section sets out the evidence which is needed so that the Proposed Plan can address the issues raised in the Act and in NPF4 and identifies any gaps or uncertainties in the evidence.

2.1 National Planning Framework 4

NPF4 sets out the Minimum All-Tenure Housing Land Requirement (MATHLR) for each authority area. The MATHLR is the minimum amount of land, by reference to the number of housing units, that is to be provided by each planning authority for a 10-year period. For Perth and Kinross, the MATHLR is 8,500. The NPF also moves away from the requirement for a 5-year effective land supply in favour of the identification of a 10-year housing land pipeline consisting of short, medium, and long-term sites.

The MATHLR was calculated by adding the projected increase in households (newly forming households) to existing housing need and then applying a flexibility percentage to allow for changes in sites coming forward.

Authorities were given the opportunity to input to the interim draft MATHLR figures produced by Scottish Government. At the time work was already well advanced on the Tayside-wide Housing Needs and Demand Assessment (HNDA) and so the initial results of the Assessment could be fed into a proposed locally adjusted estimate for Perth and Kinross as set out in the NPF4 Perth and Kinross MATHLR Assessment Report.

Newly forming households

The locally adjusted estimate for Perth and Kinross was primarily driven by the use of alternative in-house household projections. These in-house projections were based on a gradual increase in households to 5% by 2029 and on to 2037. The justification for this alternative projection considered the following factors:

- Projected growth rate compared against house completions – despite a projected fall in growth rate in National Records for Scotland (NRS) projections, house completions over the same period had been steadily increasing.

- Site activity levels – these were steadily returning to pre-pandemic levels, at a rate of approximately 800 per year in the medium term, with several large capacity sites either under construction or with full consent or a current planning application awaiting a decision.

- Potential increase in migration from the rest of the UK – historically, migration had been responsible for most of the population increase into Perth and Kinross. Limited migration figures were available at the time, but there was considered potential for in-migration from the rest of the UK to increase given the change to flexible homeworking post-pandemic, and the popular draw of Perth and Kinross as a desirable place to live. This was considered to have the potential to change the population composition with knock-on impacts on the demand for housing, particularly as the area may become a more realistic option for families, attracted by the quality of life on offer and the flexibility offered by homeworking meaning more people can choose to live in less populated areas.

- Generating additional growth and jobs – the Perth and Kinross area was seen as well placed to generate additional growth; 45% of the total registered enterprises in 2000 were in growth sectors, an increase of 12.5% from 2008. The Tay Cities Deal would also invest more than £150m over 15 years in the area. These elements contributed to at least a modest real growth scenario, possibly even strong growth, and a greater equality of income distribution with more people accessing job opportunities in sectors with higher paid jobs.

Existing housing need

A revised existing need estimate had been calculated through the HNDA process. This incorporated results from a telephone and online survey which was confirmed as statistically robust. The HNDA was confirmed as robust and credible by the Centre for Housing Market Analysis on 9 May 2023. The revised existing housing need figures were derived from the following elements:

- Homeless households and those in temporary accommodation
- Households under threat of eviction or repossession
- Concealed and overcrowded households
- Waiting list information relating to those requiring specialist housing
- Poor quality housing (Below Tolerable Standard)

For Perth and Kinross, the MATHLR was increased from the initial default estimate of 2,650 to 8,500 in NPF4.

Flexibility allowance

The MATHLR set out in NPF4 for each authority includes a flexibility allowance of 25-30% to compensate for sites stalling or not delivering as expected. For Perth and Kinross the flexibility allowance is 30%.

2.2 Perth and Kinross Housing Supply Target in LHS

The calculation of the Housing Supply Target to inform the LHS and LDP is set out in the Perth and Kinross LHS 2022-2027 Appendix: Housing Supply Targets 2022+

During the life of the LHS a need for 4,743 new homes is estimated across Perth and Kinross with the following approximate tenure split:

- 29% market housing
- 30% market rent
- 25% social rent
- 15% below market rent such as shared ownership / equity and mid-market rent

Through discussion between Perth and Kinross Council’s Housing and Planning Services, and Homes for Scotland it was agreed that in setting the Housing Supply Target for the LHS the most realistic and preferred scenario for Perth and Kinross is one which assumes an element of additional growth over and above that in the principal and high migration projections in the National Records of Scotland 2018-based Household Projections.

The Housing Supply Targets paper summarises the estimated total housing needs over a 20-period based on a growth scenario and which fed into the Perth and Kinross-wide MATHLR.

Growth Scenario	2021-25	2026-30	2031-35	2036-40
Social rent	1,881	393	256	107
Below market rent	639	489	309	133
Private rented	1,129	920	673	314
Owner occupation	1,092	906	651	313
Total	4,741	2,708	1,889	867
Average per annum	948	542	378	173
Cumulative	4,741	7,449	9,338	10,205

Source: Housing Targets paper

The housing supply target set out in the LHS is 654 houses per year comprising 210 affordable houses (social and below market rent) and 444 market houses (owner occupied and private rent). The Housing Supply Target Paper sets out in detail how the targets were derived. In summary, the market housing element was taken from the HNDA estimate with a growth scenario applied for years 1-5. The target therefore includes meeting the demand for market housing in full over the life of the LHS.

For affordable housing adopting a growth scenario results in a need for a total of 2,520 affordable houses over the 5-year period. The supply of land available over that period, however, would only facilitate around 1,000 affordable houses from the application of the Council's 25% affordable housing policy alone. Even taking into account the potential for buy-backs of ex-local authority houses and bringing empty homes back into use, it was not considered achievable for the Council and it's Registered Social Landlord partners to deliver the affordable housing element of the growth scenario within the life of the LHS. It was therefore proposed instead to aim to deliver the affordable housing component over the 20-year period of the HNDA. This would mean addressing the backlog of existing need over the full 20 years period rather than in the first 5 years as was assumed in the HNDA.

The Housing Supply Target Paper sets out in full the reasoning for meeting the backlog of existing need over a longer timeframe than that assumed in the HNDA. The annualised MATHLR of 850 per annum is already considerably higher than the Housing Supply Target set in the LHS of 654 per annum.

2.3 Evidence to inform the Indicative Local Housing Land Requirement

Looking at the expectations NPF4 has of LDPs, whilst the identification and allocation of sites comes later in the process, a primary requirement at Evidence Report stage is to identify an indicative Local Housing Land Requirement (iLHLR). It is expected that the iLHLR will exceed the MATHLR. It must, however, be evidence based. It is therefore important to identify any local factors and / or new evidence which has arisen since the publication of the MATHLR and the HST in determining the iLHLR. The sections below therefore consider how the evidence might inform the identification of an iLHLR for Perth and Kinross.

The sections below consider the following:

- **Housing market drivers (2.3.1)**
- **Housing stock profile and pressures (2.3.2)**
- **Specialist provision (2.3.3)**
- **New evidence relating to the estimate of future housing need and demand (2.3.4)**
    - **Final HNDA estimates of households in existing and future need**
    - **LHS priorities relating to existing need**
    - **Perth and Kinross Council self and custom build housing**
    - **Homes for Scotland research on existing need in Perth and Kinross**
- **Past performance (2.3.5)**
    - **Historic completions**
    - **Previous HST target for Perth and Kinross in TAYplan 2**
    - **Small sites**
    - **Windfall sites**
    - **Non-constrained sites which remain undeveloped**
    - **Constrained sites**
- **Future land availability and deliverability (2.3.6)**

2.3.1 Housing Market Drivers

The HNDA core output 1 considers the key demographic, affordability and economic factors and how these are driving the Perth and Kinross housing market.

Demographic issues:

- 12.5% increase in population between 2000 and 2019. Population projections from 2018 predict a marginal decline in population of 1%. Significantly, however, the 75+ cohort is expected to increase significantly over this period to 76%.
- 6.1% increase in households between 2008 and 2018 with a further 6-8% increase expected from 2021 to 2043 depending on migration levels. Single person and 2 adult households are expected to increase with declines in all other household groups.

Affordability issues:

- Average income in Perth and Kinross is higher than the Scottish average[2] yet the average house sale value increased by 13% from 2009 to 2019.
- 49% of people cannot afford a lower quartile market value property.

Economic issues:

- Employment rates increased by 16% between 2009 and 2019. Key industries include agriculture, forestry and fishing; professional, scientific and technical sectors; and construction.
- More than twice the number of people travel out of the area for work than travel in.
- In 2020, two of the 186 data zones were in the top 15% most deprived data zones.

Gaps or uncertainties in evidence

None identified.

How the evidence might inform the iLHLR

As abovementioned, work was already progressing on the Tayside-wide HNDA when input was requested to the determination of the MATHLR for the area. The outputs of the HNDA relating to population projections (including migration) and the potential for generating additional growth and jobs have therefore already been considered and this resulted in a MATHLR more than three times higher than that originally proposed by Scottish Government. There is not therefore considered to be new evidence relating to housing market drivers that would support increasing the iLHLR beyond the MATHLR.

2.3.2 Housing Stock Profile and Pressures

The HNDA core output 3 considers the stock profile, and the key stock condition issues and housing pressures which are influencing

[2] Including those who live within Perth and Kinross but work outwith the area. Average incomes for those living and working in Perth and Kinross are below the national average.

the operation of the Perth and Kinross housing system. Much of the data was derived from a primary research survey which was carried out to inform the HNDA.

Stock profile:

- Tenure – 66% of households owned their property, 16% privately rented, and 17% rented social housing
- Dwelling type – 76% are houses and 21% flats
- Dwelling size – 39% of homes have 1-2 bedrooms and 55% have 3-4 bedrooms

Condition:

- 2% of dwellings are Below the Tolerable Standard. The HNDA survey also indicated that 27% of dwellings are in urgent disrepair and 78% have evidence of disrepair.
- 8% of properties have low energy efficiency ratings which is twice the Scottish average.

Pressures:

- At 2019 3.9% of dwellings were unoccupied of which 1.8% had been empty long term.
- CHMA estimates indicate 2% of households are overcrowded and 1% are concealed.
- There are approximately 5 applicants for each empty social rented property.
- Impact of second homes and holiday lets.

In relation to second homes, the latest Scottish Government statistics on empty homes (Dec 2023) indicates that since 2021 the number of second homes in Perth and Kinross has remained relatively static at around 1,200. Until recently there were no specific means available to the Council for controlling the number of second homes in the area. The introduction from 1 April 2024 of an increase in Council Tax charge to 200% levied on second homes in Perth and Kinross, however, may result in the number of second homes reducing and either being sold or moving to short-term letting. Conversely, the new Short-Term Let Licencing requirements may result in a move from short-term lets to second homes.

At June 2024, applications had been received for 1,915 short term let licences of which 1,097 have so far been approved.

Gaps or uncertainties in evidence

There is a need for further data on housing system pressures in Perth and Kinross and research to address this data gap is currently underway. The research has been commissioned specifically to inform policy considerations in relation to short-term lets but it will also provide information which will inform other areas of the Evidence Report in relation to housing. The research will consider the following issues:

- Housing affordability pressures
- Income profiles and housing access barriers
- Tenure diversity and housing choice
- The operation of the housing market
- The scale, operation and affordability of the private rented sector
- Existing housing need and wider housing system pressures

Potential for impact of the Short-Term Let Licencing requirements on properties moving from short-term lets to second homes. More data on this will become available to inform the preparation of the final LHLR in the Proposed Plan.

How the evidence might inform the iLHLR

As mentioned previously, the outputs of the HNDA have already been considered in the identification of the MATHLR and at this stage, based on available information, there is not considered to be evidence which would support increasing the iLHLR beyond the MATHLR. This may, however, change for the final LHLR depending on the outcome of the forthcoming research on housing system pressures outlined above.

2.3.3 Specialist Provision

It is a specific requirement of the Act to consider the housing needs of persons undertaking further and higher education, older people and disabled people.

The Perth and Kinross Local Housing Strategy (LHS) identifies delivering housing for people with varying needs as a priority. It includes an action to build all affordable homes to revised Housing for Varying Needs standard with a minimum of 10% all affordable homes built to wheelchair and adaptable standard.

The HNDA Core Output 3 considers future property requirements associated with specialist housing provision and to enable independent living, and also future site provision to meet the needs of the Gypsy / Traveller and Travelling Showpeople communities.

Property needs:

- There are 1,344 units of specialist housing provided by social landlords. Accessible housing accounts for 29% of specialist housing.
- 2.5% of specialist homes are fully wheelchair accessible.
- There are 292 temporary accommodation units to meet the needs of homeless households.

Care and support needs:

- There were 45 care homes for adults in 2017 accommodating 1,336 residents.
- 63% of specialist homes provide housing for older people including sheltered housing.

Locational or land needs:

- A research study in 2016 into the accommodation needs of Gypsy / Travellers and Travelling Showpeople in the TAYplan area showed that there were 435 Gypsy / Travellers and Travelling Showpeople in Perth and Kinross over 185 households. 69% of the population lived in settled housing.
- There were two Council sites providing a total of 26 pitches.
- At 2016 there was projected to be a -2 shortfall to 4 surplus in site pitches over the following 5 years.
- The study included a recommendation that the potential for transit site provision be explored further. Plans for transit site in Perth are currently being progressed.

The extent and nature of future provision required across each category of specialist housing identified in the HNDA is summarised below.

Accessible, adapted and wheelchair housing:

- Up to 3,200 households may require a more accessible form housing such as accommodation without stairs.
- 640 households may require wheelchair housing.
- 7,000 households may require adaptations to their current home.

Supported housing:

- Approximately 1,500 households may require housing for older people.
- 3% of the annual homeless population in Perth and Kinross (700) have complex support needs and may benefit from Housing First tenancies.
- There is a need for 144 commissioned tenancies/spaces for key care groups with learning disability clients accounting for most anticipated future need.

Student accommodation:

- A backlog of 50 students have expressed demand for Perth College accommodation.

Gaps or uncertainties in evidence

A specific instruction in the NPF is for LDPs to allocate land for Gypsy / Travellers and Travelling Showpeople where need is identified. The HNDA concluded that over a 5-year period there would be a -2 shortfall to +4 surplus in Gypsy/Traveller site pitches This was, however, based on 2016 data. In relation to Travelling Showpeople, the HNDA referred to the then draft 2022-27 LHS which had no evidence on the needs of Travelling Showpeople to support estimating future requirements.

It is acknowledged that the data relating to the accommodation needs of Gypsy / Travellers and Travelling Showpeople is in need of updating. An updated needs assessment is programmed to be carried out 2024/25 and this will inform the final LHLR in the Proposed Plan. In addition, the Council carried out its 'Big Place Conversation' exercise to kick start the LDP3 process across Perth and Kinross communities during most of 2023. This was a substantial exercise involving over 100 events throughout the Council area. The events ranged from drop-in information sessions, meetings, and online surveys to workshops and online sessions using the Place Standard Tool to capture the views of local communities about different aspects of their places. There were also targeted sessions held with schools, service user groups, and minority groups.

Initial indications from the Big Place Conversation results are that waiting lists may be a poor indicator of demand and that there are people in social housing who would prefer accommodation more suited to their needs. The results of the Big Place Conversation will be summarised as part of a separate report on the outcomes and findings across the different locality areas. This summary of the results, and the identified place-based actions to be taken forward as part of the development of the Proposed Plan, will be provided as part of LDP3's Evidence Report under the required statement of steps taken by the Council in preparing the report to seek the views of various stakeholders, as prescribed by the Planning (Scotland) Act 2019.

How the evidence might inform the iLHLR

As will be highlighted below, the unmet need for specialist housing was taken into consideration in identifying a local housing need estimate. As previously discussed, the outputs of the HNDA were considered in finalising the MATHLR. At this stage, based on available information, there is not considered to be evidence relating to specialist housing provision which would support increasing the iLHLR beyond the MATHLR. This may, however, change for the final LHLR depending on the outcome of the updated assessment of accommodation needs of Gypsy / Travellers and Travelling Showpeople.

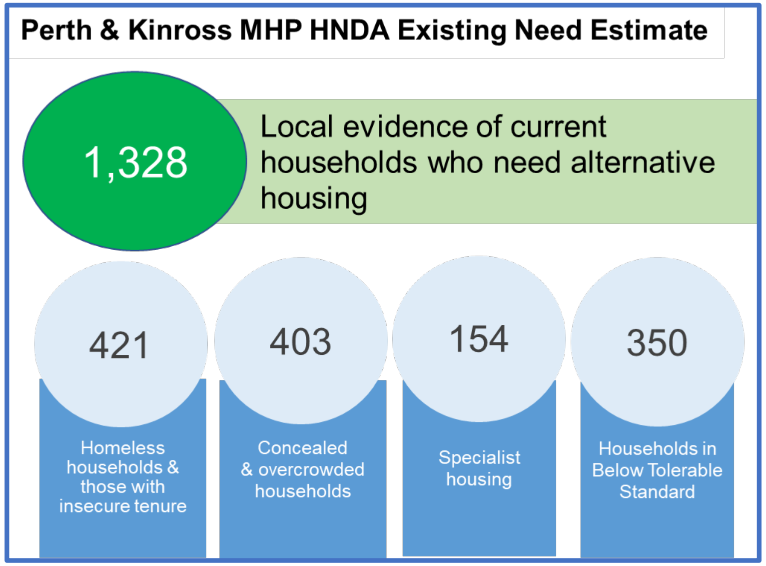
2.3.4 New Evidence relating to the Estimate of Future Housing Need and Demand

This section considers whether any new evidence has come to light relating to the calculation of future housing need and demand which would justify setting an iLHLR above the MATHLR.

Final HNDA estimates of households in existing and future need

The HNDA core output 2 estimates the number of new homes, disaggregated by tenure, that are likely to be required over the next 20 years to meet local need and demand using the Scottish Government's HNDA calculation tool. The calculations in the tool are underpinned by an affordability assessment which splits overall housing estimates into the requirement for different housing tenures.

A local estimate (as opposed to the default estimate in the HNDA tool) was developed informed by housing system evidence of households currently in unsuitable housing and who need to move to an alternative property. For this local estimate existing need is that driven by factors including homelessness, insecurity of tenure, overcrowding, concealed households, poor quality housing or a lack of basic amenities, and unmet need for specialist housing.

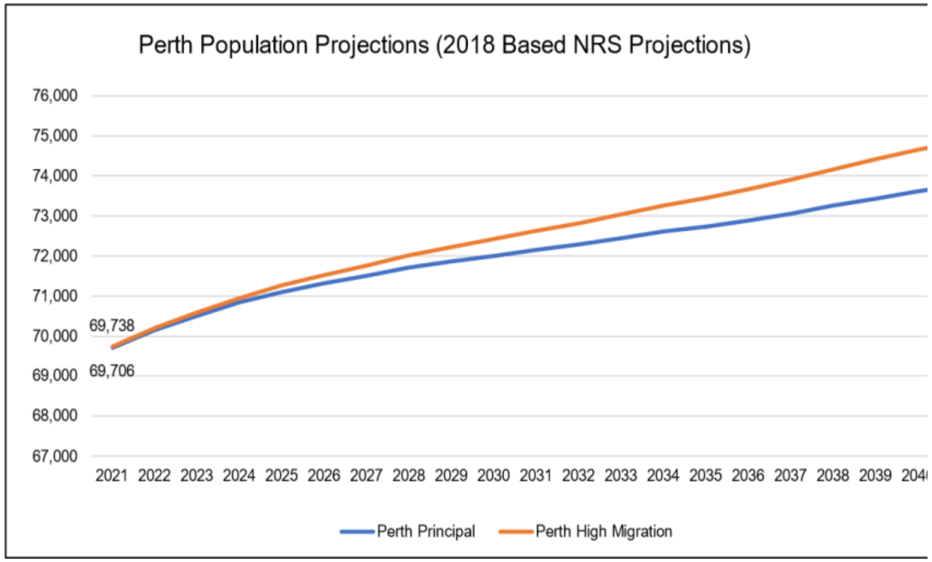


Source: HNDA

Note: MHP above should read HMP 'Housing Market Partnership'

For the purposes of the HNDA calculation it was assumed that the backlog of existing need would be addressed over the first 5-year period of the 20-year projection.

The need for new housing was assessed in the HNDA using the NRS 2018-based Household Principal Projections, and the NRS 2018-based Household High Migration Projections. This resulted in an estimate of 4,060 to 5,131 new households over the 20-year period, or an average of 203 to 257 households per year.



Source: HNDA

The HNDA calculation combines the components of housing need to create a 20-year range of housing estimates.

Source: HNDA

A further scenario was also developed which tested the impact of moving beyond the high migration scenario to reflect an ambition for housing-led growth in the area. This assumed 0.5% growth over the NRS 2018-based principal projection. The table below sets out the three different projections in 5-year bandings.

Cumulative housing need: All tenures	2021-2025	2026-2030	2031-2035	2036-2040
Scenario 1 Principal	2,946	3,786	4,522	5,388
Scenario 2 High Migration	3,125	4,237	5,271	6,459
Scenario 3 Growth	4,743	7,451	9,729	10,595

Source: HNDA table 6.2 – 2021 Perth and Kinross HNDA calculation scenarios

Using the principal and high migration projections the housing estimates in each of the Perth and Kinross HMAs across the 20-year period range from:

- 714-862 in the Strathearn HMA
- 736-887 in the Strathmore and the Glens HMA
- 167-206 in the Greater Dundee HMA
- 2,956-3,521 in the Greater Perth HMA
- 420-503 in the Highland Perthshire HMA
- 394-480 in the Kinross HMA

By tenure it is estimated that:

- 32-36% will be met by social housing
- 13-14% will be met by below market housing

- 26-27% will be met by market rented housing
- 25-27% will be met by market housing

Local Housing Strategy priorities relating to existing need

The LHS priorities which are relevant to the consideration of the calculation of existing housing need are discussed below.

The LHS includes providing more affordable homes to support liveable and sustainable communities as a priority. Actions to achieve this include:

- Maximising the development of social housing through the Strategic Housing Investment Plan (SHIP)
- Developing an empty homes strategy to target pressured areas
- Developing policy through LDP3 where appropriate for short term let control areas

NPF policy 16f) sets out the circumstances under which housing development will be supported on sites which are not allocated in the LDP. This includes where the proposal is for the delivery of less than 50 affordable homes as part of the SHIP. In terms of the authority's housing investment priorities, the Perth and Kinross Council Strategic Housing Investment Plan 24/25 – 28/29 (Oct 2023) uses a prioritisation framework to score sites for inclusion. Five criteria in total are considered but the most weight is given to the extent to which the project contributes to general unmet housing need. No specific consideration is given to any particular area within Perth and Kinross so whilst the largest proportion of sites are in the Perth area, this reflects the fact that this area has the biggest land supply.

The latest Scottish Government statistics on empty homes (Dec 2023) indicates that since 2021 the number of long-term empty homes has fallen slightly from 1,310 to 1,275.

The LHS includes an action to develop, where appropriate, planning policy through LDP3 for Short-Term Let Control Areas (LHS Action 1.7).

Perth and Kinross Council Self and Custom Build Housing

A specific requirement of the Act is consideration of persons seeking to acquire land for self-build housing. A self and custom build register has been set up for Perth and Kinross and is gathering interest even although there has been little done so far in the way of promotion.

As part of the housing land audit, completions on small sites (of less than 5 units) are recorded. It is considered reasonable to assume that a significant proportion of these small sites are likely to be some form of self or custom build e.g. houses in the countryside. Until an evidence base builds up through the register it is therefore considered appropriate to look to historic completions on small sites as an alternative data source.

The first Perth and Kinross LDP was adopted in February 2014 so looking at the data from the 2015 Housing Land Audit onwards shows that on average small sites have made up 15% of total house completions between March 2015 and 2023.

Homes for Scotland Research on Existing Need in Perth and Kinross

Homes for Scotland commissioned a primary research-led approach to understanding housing need across the whole of Scotland. A report has also been published for the Perth and Kinross area specifically. The research only considered existing need and not future need.

Homes for Scotland is concerned that the Scottish Government estimates of existing housing need included within the MATHLR calculations are based on counts of homeless people in temporary accommodation and of households that are both overcrowded and concealed. This is considered too strict a definition of need as it only takes account of those households with a particularly pressing need. Homes for Scotland argue that this tight definition overlooks those households whose need may not be pressing, but which should still be considered in the planning and housing processes. The inclusion of primary data from a survey allows for wider definitions of need and demand to be incorporated.

Homes for Scotland is also concerned that the extensive and costly traditional means of collecting primary data for HNDAs means that the fuller approach to data collection is now quite rare. Through the research Homes for Scotland sought to undertake shorter surveys of housing need and demand and to assess the calculations in a straightforward, robust and efficient way, allowing for the production of more accurate and meaningful local assessments (report p.7)

The research surveyed households using an online panel (Scotpulse). The panel has a membership of over 47,000 adults in Scotland meaning it can produce reliable and robust estimates at national and, in most cases, at local / regional levels. For the Perth and Kinross report 482 households were surveyed and extrapolating these results to c.71,000 households in Perth and Kinross the following conclusions were drawn:

- 12,000 households have at least one concealed household
- 6,000 households are living in properties that they were struggling to afford
- 3,000 households in the area are overcrowded
- 2,000 households were living in properties with very poor conditions
- 1,000 households are living in properties where they do not have the specialised adaptations or support they require

The research acknowledges that meeting these needs will not all require the provision of additional houses. Some needs can be met by in-situ solutions e.g. the provision of adaptations, or by the freeing up for another household a property of an unsuitable size e.g. an overcrowded household moving to a larger house would free up that property for a smaller household.

Gaps or uncertainties in evidence

None identified

How the evidence might inform the iLHLR

HNDA estimates of households in existing and future need

For the purposes of preparing an HNDA which would be confirmed as robust and credible by the CHMA, the HNDA estimate of new households was based on the NRS Principal and High Migration projections. The most up-to-date projections which are available at local authority level are still the 2018-based projections as were used in the HNDA. The MATHLR, however, was based on an alternative in-house projection which was higher than either of the NRS projections. No further assessment has been taken of the other HNDA inputs.

Local Housing Strategy priorities relating to existing need

The LHS has a specific focus on bringing empty homes back into use (LHS Action No. 1.2). This would suggest that in future the proportion of the housing stock which is long-term empty is most likely to decrease rather than increase.

Perth and Kinross Council Self and Custom Build Housing

Consideration has been given to adding an element of flexibility in the iLHLR to take small sites into account. Ultimately, however, this was discounted given that in the past the LDP has tended not to allocate sites of less than 10 houses. Instead, small sites have been facilitated though the Housing in the Countryside policy and allowing scope within settlement boundaries where appropriate. No decision has been made as to the scale of site which will be allocated in LDP3.

Homes for Scotland Research on Existing Need in Perth and Kinross

A key concern identified in the Homes for Scotland research is that some HNDAs are being carried out based only on secondary data. This is not the case for Perth and Kinross as the Tayside HNDA included primary research. This in turn informed the Council's input to the identification of the MATHLR for the area in NPF4. That said, the Homes for Scotland commissioned research is more up to date (August 2023 whereas the HNDA survey was carried out in March / April 2021) and so it is relevant to review the data inputs to this research.

Whilst the Tayside HNDA was based on both a telephone survey and an online survey (415 responses in total), the Homes for Scotland survey was online only. The latter did, however, have a larger number of responses (482). Both surveys are confirmed as statistically robust. A significant difference was in the length of the survey – 33 questions for the online Tayside HNDA survey (44 questions for the telephone survey) compared to 16 questions for the Homes for Scotland survey.

Direct comparison of the results of the HNDA with the Homes for Scotland research is not possible due to the differences in information sources e.g. the way in which a survey question was framed. A general comparison of the results as they relate to the different categories of need, however, reveals the following.

Issue	HNDA	Homes for Scotland research
Concealed and overcrowded households	403 concealed and overcrowded households which is derived from those identifying themselves in the survey as overcrowded or sharing amenities with another household with double counting eliminated	Survey identified 12,000 households with at least one concealed household, and 3,000 households that are overcrowded
Poor quality housing	350 households in housing identified as Below Tolerable Standard using House Condition Survey outcomes	Survey identified 2,000 households living in properties with very poor conditions
Specialist housing	154 households who need to move due to medical needs or who require specialist housing applications as a measure of housing waiting lists	Survey identifies 1,000 households living in properties where they do not have the specialised adaptations or support they require
Affordability	No comparable measure	Survey identifies 6,000 households living in properties they are struggling to afford
Homeless households	421 homeless households and those with insecure tenure using HL1 statistics and the HNDA survey	100 households that are homeless or in temporary accommodation sourced from the Scottish Government, Homelessness in Scotland, 2022-23
Total existing need	1,328	c.21,100 gross – reduces to c.12,200 households when in-situ solutions and the ability to afford to buy out of need is taken into account

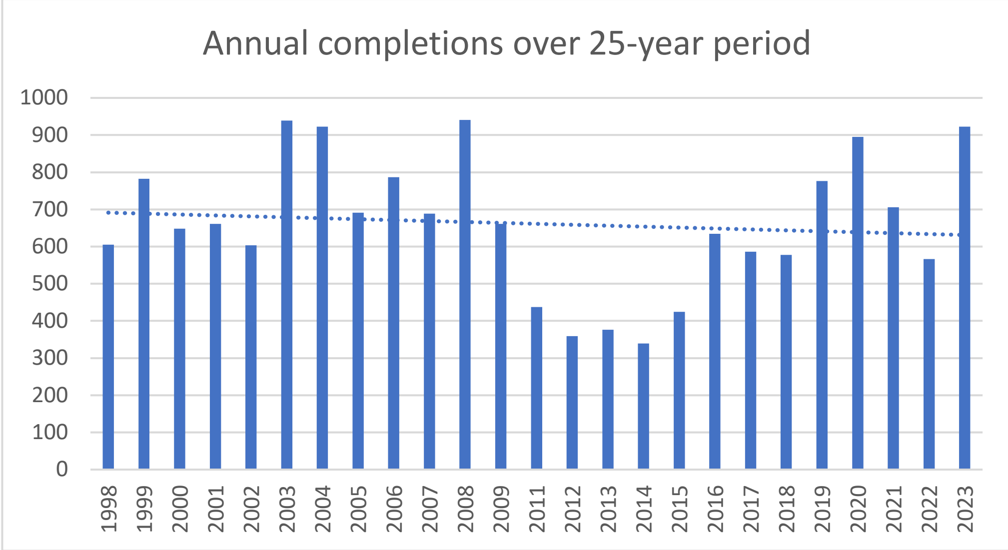
Homes for Scotland acknowledge that their research does not constitute a full HNDA but considers that it provides 'a robust assessment of actual need based on primary research of households in Perth and Kinross that is up to date'. It is suggested that the figures provided in the research can be used in conjunction with other data sources as part of the HNDA process. The research identifies considerably higher levels of housing need than that in the HNDA or that could be accommodated within the MATHLR. In this regard the issue perhaps relates more to increasing delivery rather than simply increasing supply and this is considered further in the sections below.

2.3.5 Past Performance

The main source of information on past performance comes from the annual housing land audit. The most recent housing land audit for Perth and Kinross reflects the position at 31 March 2023.

Historic completions

The chart below shows past completion rates on all sites over a 25-year period. Please note that 2010 data has been excluded as this reporting year only covered a 9-month period. The overall trend line shows a gradual decrease in completions over the 25-year period.



Source: Perth and Kinross Housing Land Audits

The previous housing land requirement upon which the current LDP was based was set by the Strategic Development Plan, TAYplan2. That Plan identified an average annual housing land requirement for Perth and Kinross of 1,000 units per year. Previous HLAs have included an assessment of the land supply against the housing land requirement set by TAYplan by providing an update to LDP Table 1: Housing Land Requirements and supply by Housing Market Area. The most recent update was included in the 2022 HLA.

Housing Market Area	Greater Dundee	Strathmore and Glens	Highland Perthshire	Kinross	Strathearn	Greater Perth	PKC total
HLR 2016-2029	78	1,859	995	983	1,846	7,239	13,000
Completions to 2022	40	438	245	576	645	2,163	4,107
Effective supply 2022-2029	60	886	405	486	802	3,332	5,971
Windfall assumption	0	100	60	59	99	378	696
Small site allowance for Highlands			89				89
Surplus / shortfall	22	-435	-196	138	-300	-1,366	-2,137

Source: 2022 Perth and Kinross HLA

The commentary in the 2022 HLA identified shortfalls in housing land supply in four of the six HMAs across Perth and Kinross but notes that 'ultimately the issue is not one of land allocation but in the delivery of the land in the short-medium term'. At 2022 the agreed non-constrained effective land supply stood at 18,292 units. This highlights that identifying a land requirement, which at the time was higher than completions that had ever been achieved in any one year, does not automatically result in those higher build rates being achieved.

Previous HST target for Perth and Kinross in TAYplan2

As abovementioned, TAYplan2 identified an average annual housing land requirement for Perth and Kinross of 1,000 units per year. TAYplan2 is no longer in force yet it is useful to consider the Examination Report in relation to the Reporter's views on setting a realistic housing land requirement for Perth and Kinross.

The requirement of SDPs was to set both a HST and a HLR for each local authority area. The HLR was to reflect the HST plus a flexibility allowance of 10-20%. The Reporter concluded that the:

> '…target to build an average of 1,000 homes a year would require more homes to be built annually that has ever been achieved in any year over the period since 2002, and 24% more homes than the average annual figure even for the pre-recession years of 2022 to 2009….It is clear that the authority believes fewer than 1,000 homes will be delivered on average in Perth and Kinross in the Plan period, and the consensus among the housebuilding industry is also that this level of target is challenging. I therefore conclude that the proposed housing supply target [of 1,000 per year] for Perth and Kinross is too high.' (TAYplan2 Examination Report p.222)

The end result of the examination was to instead identify a HLR of 1,000 alongside a lower HST which the Reporter considered '…the most pragmatic way to ensure that the plan contains a more realistic housing supply target and housing land requirement for this area….' (Examination Report p.226).

It is acknowledged that the Examination Report dates from 2017 and since then there have been significant changes and challenges faced by the house building industry, not least of which the impacts of the covid-19 pandemic and Brexit. The TAYplan Examination does, however, highlight the importance of setting a realistic HLR.

Small sites

The annual housing land audit records those completions which have occurred on sites of less than 5 units. As shown in the table below, small sites have historically contributed varying proportions to total completions but have been particularly significant in the Highland Housing Market Area.

HMA	2011-2023 Total small sites	Average	Small sites as % of all completions 2011-2023
Perth	3,863	297	10
Greater Dundee	57	4	0
Highland	574	44	45
Kinross	982	76	20
Strathearn	1,271	98	16
Strathmore	852	66	18
Perth and Kinross	7,599	585	16

Source: Perth and Kinross Housing Land Audits

Windfall sites

As well as completions on small sites, the annual housing land audit records those completions which have occurred on 'windfall' sites. These are defined in the LDP as sites which become available for development unexpectedly and are therefore not included as allocated land in the LDP. The calculation of the housing land requirement for LDP2 assumed that 10% would be met on windfall sites.

An assessment of historic completions on windfall sites has been undertaken again between March 2015 and March 2023, so, covering the two LDP periods. This is important as it is generally the case that the level of windfall opportunities increase the further it gets from the Plan adoption date. The assessment showed that on average completions on windfall sites constituted 30% of all completions on sites of 5 or more.

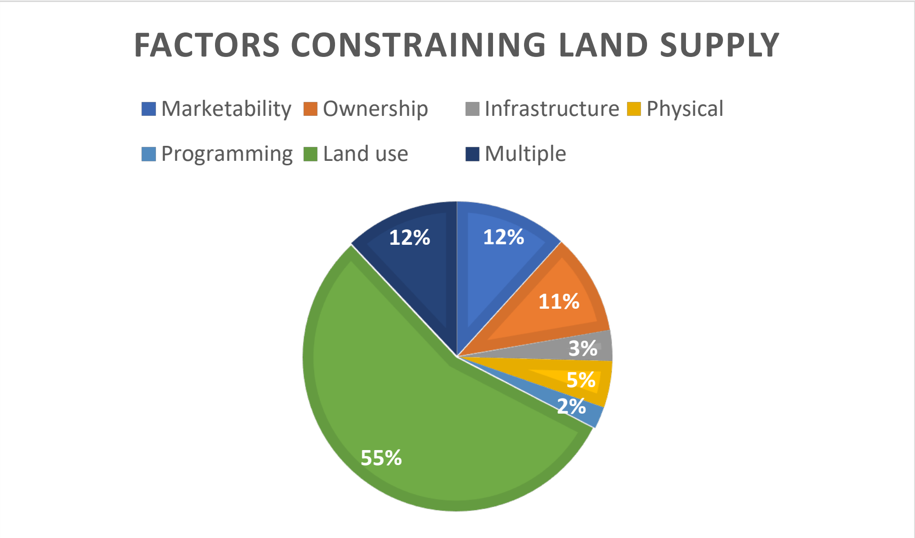
Non-constrained sites which remain undeveloped

There are 153 sites in the 2023 HLA. 33 of these sites (totalling nearly 6,800 units) are allocated in the LDP but which do not yet have planning permission. LDP2 was adopted in 2019. This is a considerable proportion of allocated sites which, at March 2023, had not yet progressed to planning application stage. Furthermore, a number of these sites were carried forward from LDP1.

In some cases, there may be legitimate reasons for the delay in bringing a site forward but there is concern that in some instances sites are simply being land-banked for a future date. This is a particular problem in areas where the land supply is under the control of a small number of housebuilders who may also have development interests elsewhere in the Council area. The willingness of individual house builders to deliver on their existing supply of allocated sites is an important factor.

Constrained sites

Of the 153 sites in the 2023 HLA 16 of these (totalling around 350 units) have some form of constraint which is currently preventing development from taking place. A further 4 sites, totalling nearly 490 units, are considered constrained and are disputed in the 2023 Audit by Homes for Scotland. The number of units by type of constraint is shown in the chart below. Although land use constraint accounts for more than half of constrained units this is due to the inclusion of 2 large sites within this category.



Source: Perth and Kinross Housing Land Audits

Gaps or uncertainties in evidence

None identified.

How the evidence might inform the iLHLR

Analysis of past completion rates as an indicator of future delivery must be treated with a degree of caution as house completions are so heavily dependent on peaks and troughs in the market. The key point to note from historic completions data is that over the 25 years considered, only in 5 years did the total completions exceed the annualised MATHLR of 850. Average completions over the 25 years were just under 760. Based on historic completion rates alone, therefore, there is not the evidence to support increasing the iLHLR beyond the MATHLR.

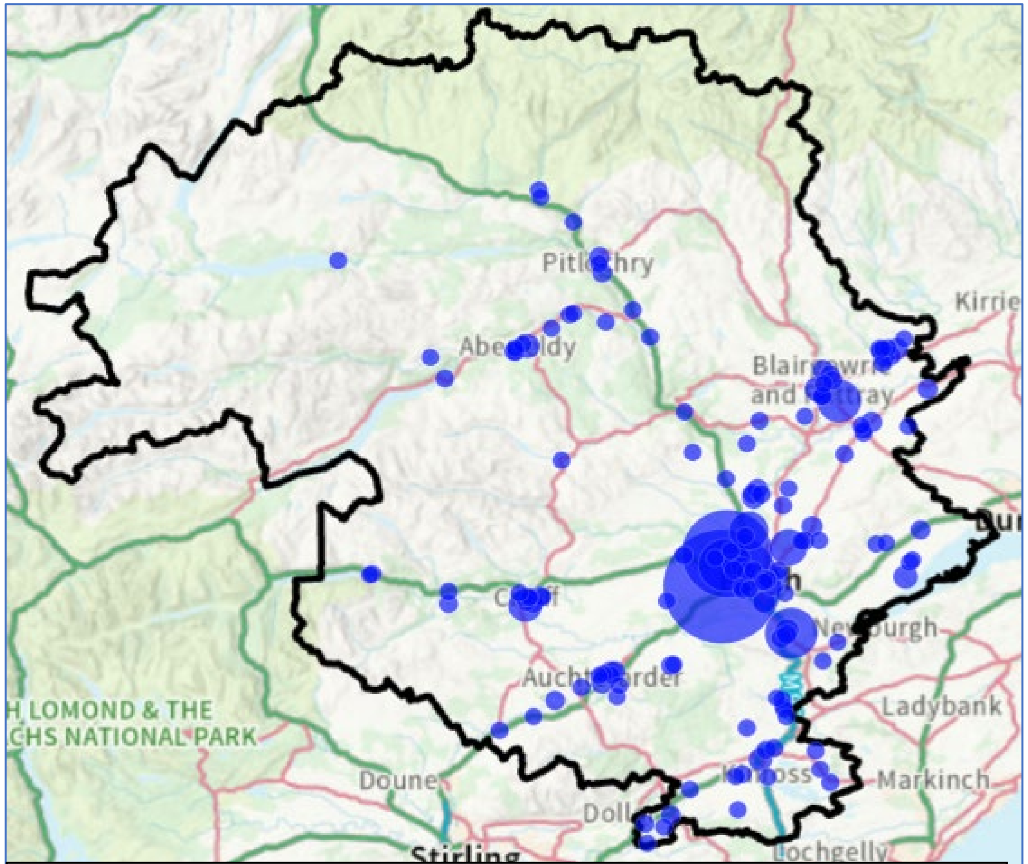
The Local Development Planning Guidance allows authorities to take account of windfall sites in calculating their iLHLR. Any assessment of the expected contribution of windfall sites must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends (Guidance p.63). There is no specific mention of small sites within the Guidance.

The new planning system requires a full review of all allocated sites for the next LDP. No site should just roll forward from one plan to the next as has sometimes been the case with past LDPs. This means that any sites which are uncertain in terms of their deliverability should be considered for removal from the next plan. In turn this should mean that going forward completions on windfall sites as a percentage of overall completion should reduce. On this basis it is not considered that sound assumptions can be made about the likely future contribution from windfall sites. As such it is not proposed to include in the iLHLR a contribution from windfall sites, rather these will provide a further element of flexibility in the land supply. Similarly for small sites, despite the significant contribution these have made to overall completions (particularly in the Highland HMA) it is not proposed to include in the iLHLR a contribution from small sites.

2.3.6 Future Land Availability and Deliverability

The main source of information on future land availability comes from the annual housing land audit. The most recent housing land audit for Perth and Kinross reflects the position at 31 March 2023. At 2023 there was a total non-constrained (previously referred to as 'effective') agreed land supply of 16,922.

Location of remaining Housing Land Supply at 2023



Source: Perth and Kinross Housing Land Audit

There is a greatly enhanced emphasis in NPF4 on deliverability. As such LDPs are to consider de-allocation where sites are no longer deliverable. Whilst market factors will play a significant role in assessing the continued deliverability of housing sites, other elements of the NPF4 strategy must also be taken into account. NPF4 policies on tackling the climate and nature crises, climate mitigation and adaptation, sustainable transport, local living, and infrastructure first are just a few of the factors which could also affect the deliverability of land for new housing.

For the 2023 HLA, factors which are currently affecting site delivery were apportioned to those sites under discussion with Homes for Scotland (approximately 25% of all sites). This was based on the approach which has been used by Edinburgh City Council for a number of years. Factors relate to the ownership or control of a site, the planning system, or to the development industry. For nearly half the sites considered the key factor affecting delivery was identified as the need to align ownership with the intention to develop i.e. the site is allocated for housing but it has not been progressed by the owner. These sites are not in the hands of a house builder and often the owner has indicated that they do not intend to market the site at present. For most of the other sites the delivery factors identified were associated with the development industry either:

- the site is under construction and the rate of delivery is determined by market demand,
- the site is in the control of a developer with all consents in place, but development has yet to start, or
- planning consent is in place, but the consent was obtained by the landowner or development company.

In a Briefing Paper Homes for Scotland further identify the barriers to housing delivery as including:

- Net-zero transition including supply chain and grid capacity.
- Infrastructure funding and delivery causing significant impact on development viability.
- Access to labour and skills impacting build programmes, costs and introduction of new technologies and practices.
- Planning and consents including low minimum housing targets, and a lack of deliverable available land.
- Market conditions including consumer confidence, mortgage constraints, cost inflation, and the attractiveness of Scotland as a place to invest.
- Regulatory impact making it easier to build elsewhere.
- Unintended consequences of unevidenced policy making increases risk and uncertainty and impacts decision making.
- SMEs are struggling including difficulties to development finance – such enterprises are vital to the rural housing supply but the existence of many are under threat.

Gaps or uncertainties in evidence

Every year the audit is discussed with Homes for Scotland with a view to achieving consensus on individual site programming. With the changes brought about by the new planning system it was a more complicated process this time, especially given that the 10-year housing land pipeline is not yet in place. As a result, it was not possible to reach agreement on the programming of four sites within the 2023 audit, all of which Homes for Scotland consider constrained and should not be programmed with the 10-year period. Whilst this is far from ideal there will be further opportunities for discussion with Homes for Scotland and their members through the preparation of subsequent audits which will inform the preparation of the Proposed Plan.

The consideration of factors affecting delivery as used by Edinburgh City Council is still at an early stage and only some sites in the HLA have been discussed in draft form with Homes for Scotland as a pilot exercise in 2023. This highlighted that it may be appropriate to adapt the Edinburgh approach to more closely reflect some of the factors applicable in Perth and Kinross before rolling this out as a formal part of the HLA process. It is proposed that this will be carried out for future HLAs and will therefore be in place to inform the final LHLR in the Proposed Plan.

How the evidence might inform the iLHLR

At a build rate of 850 units per year (the annualised MATHLR) there is sufficient land to last nearly 20 years, almost double the 10-year LDP period. Based on future land availability alone, therefore, there is not the evidence to support increasing the iLHLR beyond the MATHLR. It is acknowledged, however, that this is not a straightforward calculation. Much of the current land supply is longer term and there have been shortfalls in short-term land supply identified in previous housing land audits. Furthermore, as abovementioned, the new planning system requires a full review of all allocated sites for the next LDP. It is possible therefore that this could highlight some sites which should be de-allocated if they have little or no prospect of delivery within the plan period.

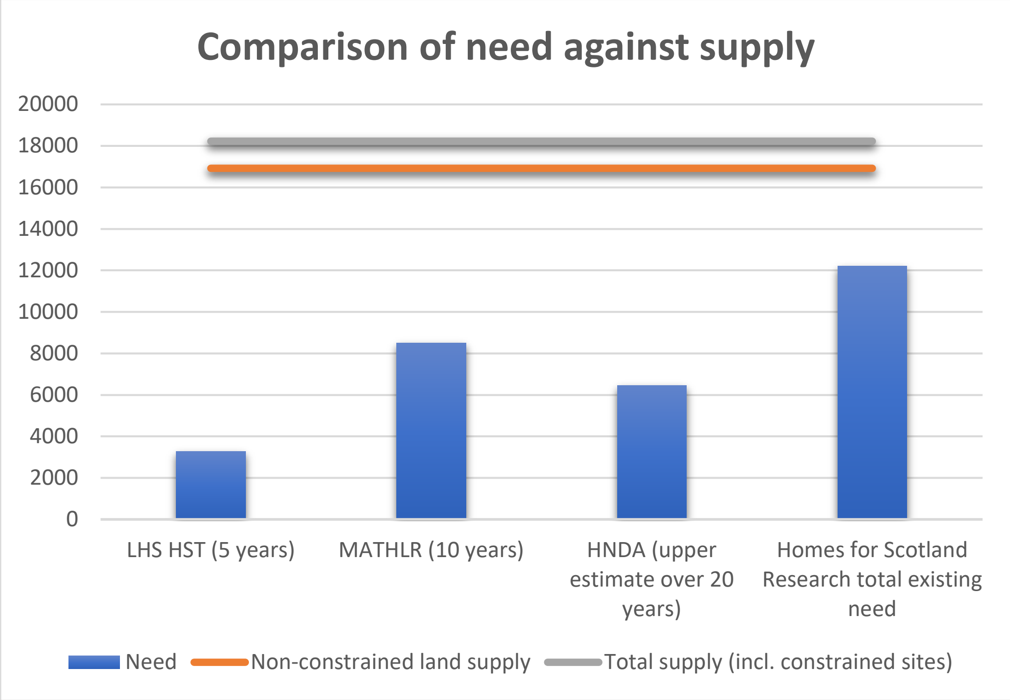
Future deliverability is difficult to predict but, as highlighted in the Perth and Kinross MATHLR Assessment Report, the Council promotes inclusive growth and investment to enable higher value jobs and workforce retention. The potential for generating additional growth and jobs in Perth and Kinross was therefore taken into account in the setting of the MATHLR for the area.

The Homes for Scotland Briefing Paper highlights the barriers to the delivery of housing in Scotland. A lack of deliverable available land, and low minimum housing targets are highlighted but it is clear from the variety, scale and significance of the barriers set out in the Paper that the problem will not be solved by simply increasing the supply of land. Issues such as supply chain constraints to achieving a transition to net zero, infrastructure funding and delivery, access to labour and skills, mortgage constraints, and cost inflation all impact on the ability of the industry to deliver. These issues will not be resolved by allocating additional land alone and therefore the existence of so many barriers do not in themselves justify increasing the iLHLR beyond the MATHLR.

3 An Indicative Local Housing Land Requirement for Perth and Kinross

What is clear from section 2 is that there is no one individual factor or clear piece of evidence which in itself justifies increasing the iLHLR beyond the MATHLR. Section 2 also highlights that nor is there a single definitive measure of housing need and demand, particularly in relation to the extent of existing need.

The chart below shows that in very simplistic terms there is more than enough non-constrained housing land identified in the most recent HLA to accommodate even the highest need calculation although it is acknowledged that the Homes for Scotland research only considered existing need and not future needs. Ultimately, however, it is the bringing forward for development of that non-constrained land supply which results in the end delivery of houses on the ground.



The key questions to consider are firstly, what capacity is there within the industry to deliver houses at a higher rate and secondly, what would be the impact of increasing the supply of land for housing on the overall delivery of housing in Perth and Kinross. One concern is that a significant increase in the allocation of sites could dilute the market and / or lead to developers 'cherry-picking' the easiest sites in the most profitable areas to the detriment of achieving regeneration goals and sustainable development in other parts of Perth and Kinross.

In proposing a locally adjusted MATHLR the Council wished to reflect its ambitions for the sustainable growth of Perth and Kinross, and this was reflected in the challenging figure proposed. Whilst the Council was acutely aware of the risks of failing to allocate a generous supply of land for housing in the new LDP when proposing the challenging MATHLR, it must also be recognised that a significant oversupply of land could also pose risks.

The MATHLR set out in NPF4 for Perth and Kinross already includes a generous flexibility allowance of 30% to compensate for sites stalling or not delivering as expected. Furthermore, despite historic evidence of a significant contribution from small sites and windfall sites in Perth and Kinross, it is not proposed to include these within the iLHLR. This will allow even more flexibility in the supply of houses.

Some data gaps currently exist and the final LHLR in the proposed plan will include consideration of those issues highlighted in section 2 for which data is currently not available or is out of date. For setting the iLHLR in the Evidence Report, however, two options are proposed:

Proposed Indicative Local Housing Land Requirement

OPTION 1
No increase on the MATHLR – the identification of an iLHLR of 8,500 over 10 years

OPTION 2
Plan for an iLHLR of 10,000 units over a 10-year period

Option 1 for no increase on the MATHLR would be on the grounds that the MATHLR already takes account of the Council's commitment to sustainable growth by seeking a challenging land requirement which balances the need to ensure a generous supply of housing land against the potential risks associated with oversupply.

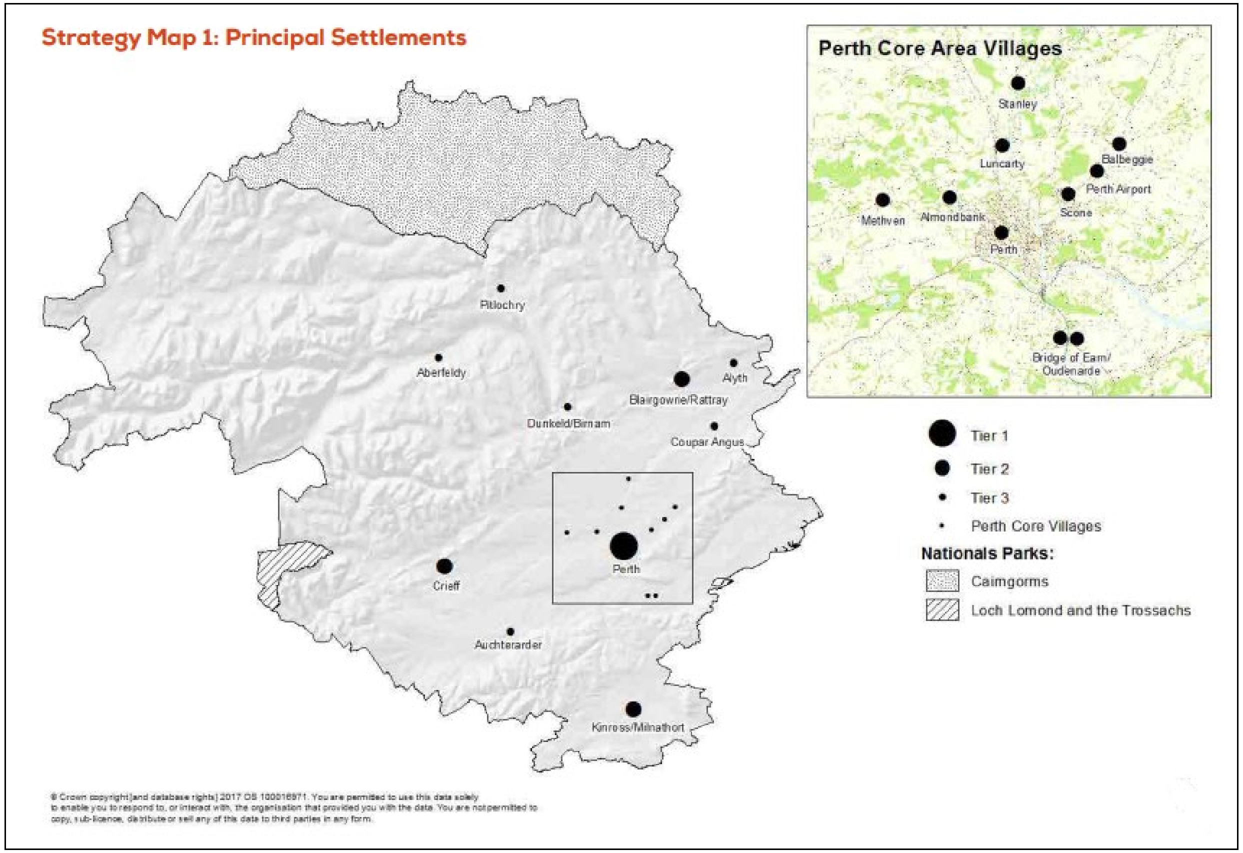
Option 2 is to plan for an iLHLR of 10,000 units over a 10-year period. This is an arbitrary figure for which there is no specific evidence. It does, however, reflect the higher land requirement which was set by the previous SDP for Perth and Kinross, and which was previously considered a realistic option albeit the rate of 1,000 house completions per year was never achieved. It also meets the expectation (although not requirement) in NPF4 that the LHLR will exceed that MATHLR.

4 Implications for Proposed Plan

The initial implications of the evidence for the Proposed Plan which have been identified so far are set out below. This will be revised and updated following consultation on this Topic Paper.

4.1 Current spatial strategy

The spatial strategy for the current LDP2 was established by TAYplan2. TAYplan Policy 1 Locational Priorities directed LDPs to focus the majority of development in the area's principal settlements.



In line with the strategic development Plan LDP2 allocated sites for housing as follows:

- Tier 1: Perth Core Area was to accommodate the majority of new development
- Tier 2: Existing Regional Service Centres were to accommodate a smaller share of new development as these centres had a range of services to support growth
- Tier 3: Existing Local Service Centres were to accommodate a very small share of new development with the focus on supporting their continuing growth

Below the tiered settlements the LDP2 strategy allocated limited growth to those settlements with a range of facilities capable of serving local needs. Growth within the smallest and least accessible settlements with few or no local facilities was restricted (LDP2 p.16).

4.2 Factors to be considered for LDP3 spatial strategy

Rural areas

NPF4 places a much greater emphasis on encouraging economic activity in rural areas in order to create vibrant and sustainable rural places and a balanced and sustainable rural population (NPF4 Policy 29 Rural Development). The spatial strategy in the current LDP2 will therefore need to be assessed against the increased support for development in rural areas in NPF4 in developing the spatial strategy for LDP3.

Settlement boundaries

The existing spatial strategy in LDP2 also presumes against development adjacent to settlement boundaries:

Policy 6: Settlement Boundaries

For those settlements which have a boundary defined in the Plan, built development will be contained within that boundary. Development on sites that adjoin these settlement boundaries will only be permitted where the proposal is:

(a) *in accordance with Policy 8: Rural Business and Diversification and does not adjoin a principal settlement boundary;*

(b) *justifiable on the basis of a specific operational and locational need and it can be demonstrated that there are no suitable sites available within the settlement boundary; or*

(c) *required to address a shortfall in housing land supply in line with Policy 24: Maintaining an Effective Housing Land Supply: and*

(d) *will not result in adverse effects, either individually or in combination, on the integrity of a European designated site(s).*

Where there is no defined boundary, or for proposals on sites that do not adjoin a settlement boundary, Policy 19: Housing in the Countryside, or Policy 8: Rural Business and Diversification will apply.

Notes:

1 *Principal settlements are those defined in TAYplan.*

2 *Specific operational and locational need is where it is demonstrated that the development must be located on a particular site. It may include essential infrastructure works, and single houses where these are required on a particular site for a local or key worker associated with either a consented or an established economic activity. The need for the house must be demonstrated. Proposals for houses which are not directly linked to an economic activity will not be permitted on sites that adjoin settlement boundaries.*

There is no similar emphasis in NPF4 and as such consideration will also need to be given through the plan preparation process to the future role of settlement boundaries as a means of either restricting or encouraging additional development.

Minimising land take and maximising assets

NPF4 policy 8 Brownfield, vacant and derelict land and empty buildings seeks to ensure that 'development is directed to the right locations, maximising the use of existing assets and minimising additional land take'. The spatial strategy for LDP3 will need to consider the options to achieve this, for example, increasing densities on established sites, and the actions that the Council can take to accelerate the delivery of houses on sites which are currently constrained.

Planning for a range of housing solutions and options

NPF policy 16 Quality Homes seeks to encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland. In preparing the spatial strategy for LDP3 consideration will need to be given to how best to plan for a range of non-mainstream housing solutions and options including, for example:

- Small rural opportunities including for affordable homes and homes for local people
- Gypsy / traveller sites
- Self-build options
- Windfall sites and sites in other uses

4.2 Identifying a deliverable housing land supply

NPF4 expects delivery programmes to establish a deliverable housing land pipeline for the LHLR. All existing allocated sites require to be reviewed and will only be included in LDP3 if it can be demonstrated that they will deliver within the Plan period (or beyond the Plan period for longer term land supply). This may result in the de-allocation of some existing sites which will require alternatives to be identified.

There will be a greatly enhanced role for the LDP delivery programme in future.

5 Stakeholder Engagement

A crucial element of the HNDA process was engaging with the key stakeholders on the building of the HNDA evidence base and in validating the core outputs and housing estimates. Two engagement events were held. The first was used to inform HNDA calculation scenarios and estimates to form the basis of the final outputs. The second event provided an opportunity to scrutinise the evidence and validate the final housing estimates. In total the events were attended by a total of 54 stakeholders.

More generally, Homes for Scotland and their member organisations are consulted on the HLA each year. A recently re-established Housebuilders Forum also meets bi-annually involving Homes for Scotland, house builders, RSLs and representatives from numerous Council services.

Feedback is now sought on this Topic Paper on whether stakeholders and other interested parties agree with evidence which we intend to use to prepare the Proposed Plan as set out above.

Key discussion points for feedback

- **Any additional evidence which should be considered to inform the iLHLR**
- **Options for the iLHLR**
- **Any additional implications for the Proposed Plan**