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**SUPPLEMENTARY RESPONSE TO WEST LOTHIAN LOCAL
DEVELOPMENT PLAN EXAMINATION – FURTHER INFORMATION
REQUEST 03 – ISSUE 1A – HOUSING LAND AND POLICIES HOU1,
HOU2 AND CDA1**

11 May 2017

ABOUT HOMES FOR SCOTLAND

Homes for Scotland is **the** voice of the home building industry.

With a membership of some 200 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people *want* to live.

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PROCESS

Homes for Scotland represents members on a wide range of issues affecting their ability to deliver much needed homes.

Our views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from member companies.

Supplementary Response to West Lothian Local Development Plan Further Information Request 03 - Issue 1A Housing Land and Policies HOU1, HOU2 and CDA1

Introduction

Homes for Scotland welcomes the opportunity to respond to West Lothian Council's commentary on Further Information Request (FIR) 03 - Issue 1A of the West Lothian Local Development Plan (LDP) Examination.

This Supplementary Response sits alongside our submission to FIR 03 on 4th April 2017.

The submission on 4th April 2017, referred to the following supporting Documents:

1. West Lothian Council Housing Land Position Statement (May 2016)
2. Edinburgh Local Development Plan Examination Report (June 2016)
3. East Dunbartonshire Local Development Plan Examination Report (September 2016)
4. SESplan Annual Housing Update 2016 (March 2017)
5. Housing Land Position Statement – Appendix – Housing Land Supply Review (April 2016)
6. Housing Land Audits – Homes for Scotland Procedures (May 2015)

Homes for Scotland wishes to provide the LDP Examination with the following additional supporting documents:

7. West Lothian Draft 2016 Housing Land Audit (December 2016)
8. Finalised Homes for Scotland 2016 Housing Land Audit (May 2017)
9. Constrained Sites included in the Effective Housing Land Supply by the Council post December 2016 (May 2017)
10. HNDA Manager's Guide (2014)
11. HNDA Practitioner's Guide (2014)
12. Scottish Borders Local Development Plan Examination Report (Issue 080) (October 2015)
13. CLYDEplan Strategic Development Plan Examination Report (March 2017)
14. West Lothian Figure 4 as amended by HFS – Commentary on 2014 Constrained Sites Identified in LDP
15. Finalised Homes for Scotland 2016 Audit – Update to Figure 5 (HFS Document 15); and
16. West Lothian Draft 2016 Audit – Update to Figure 5 (HFS Document 16)

These documents are referred to in this Supplementary Response when required.

Homes for Scotland notes that the Council has submitted a revised Draft 2016 Audit (April 2017) in its response to FIR 03. According to the Council, this is Version 6 of the 2016 Audit.

Homes for Scotland understands that the Council is preparing a further update to the 2016 Audit to be submitted to the LDP Examination.

The appointed Reporters for this LDP Examination should be aware that:

- This new Council document is a significant departure from the Draft 2016 Audit submitted to Homes for Scotland for external consultation on 15th December 2016 (HFS Document 7);

- This new Council document is a significant departure from the Draft 2016 Audit reported to the SESplan Joint Committee on 13th March 2017 (HFS Document 4);
- Homes for Scotland and its Members had been working towards finalising and agreeing the 2016 Audit (HFS Document 7), meeting with the Council on 21st February 2017 to finalise and agree comments submitted to date.;
- Homes for Scotland sent emails seeking to reach agreement to the 2016 Audit on 27th March 2017, 30th March 2017 and 5th April 2017 to which there was no response; and
- The Council only issued this new Council document for external consultation with Homes for Scotland on 7th April 2017, after the deadline for the response to FIR 03 on 4th April 2017.

For avoidance of doubt, the protocol for Homes for Scotland to agree a housing land audit is set out in the Homes for Scotland Procedures (HFS Document 6). The Council has clearly departed from this process for its own reasons.

It is apparent that following the reporting of the Draft 2016 Audit (HFS Document 7) to the SESplan Joint Committee on 13th March 2017 and the issuing of the FIR 03 on 14th March 2017, the Council has sought to revisit and revise its agreed baseline housing land position solely for the purposes of this LDP Examination. This is unreasonable and unacceptable behaviour.

For avoidance of doubt, the Draft 2016 Audit (April 2017, Version 6) issued to the LDP Examination is disputed by Homes for Scotland and does not represent an agreed position.

As a result, Homes for Scotland has prepared the Finalised Homes for Scotland 2016 Audit (HFS Document 8) to submit to the LDP Examination. This 2016 Audit reflects commentary and correspondence agreed with the Council until 7th April 2017.

Homes for Scotland respectfully requests that no weight is attributed to the new Council document or any subsequent update issued by the Council without prior agreement.

If the Draft 2016 Audit (April 2017, Version 6) or a further update is accepted for the Examination, the ramifications are that the process of agreeing a housing land audit will be significantly undermined across Scotland.

Homes for Scotland respectfully requests that significant weight is only attributed to the Finalised Homes for Scotland 2016 Audit (HFS Document 8) or the Draft 2016 Audit issued for external consultation (HFS Document 7).

Geddes Consulting has extrapolated both the Finalised Homes for Scotland 2016 Audit (HFS Document 8) and the West Lothian Draft 2016 Audit issued for external consultation (HFS Document 7) over the LDP periods to 2027. Homes for Scotland has undertaken this exercise to determine whether the Council will meet its housing land requirement in full as required by the approved SDP and SPP.

The evidence is set out in the following documents:

- Finalised Homes for Scotland 2016 Audit – Update to Figure 5 (HFS Document 15); and
- Draft 2016 Audit – Update to Figure 5 (HFS Document 16)

The outcome of the Finalised Homes for Scotland 2016 Audit – Update to Figure 5 is as follows:

	2009-19	2019-24	2024-27	2009-27
Setting the LDP Housing Land Supply Target				
LDP Housing Supply Target	11,420	6,590	3,954	21,964
Generosity Allowance (10%)	1,142	659	395	2,196
LDP Housing Land Requirement	12,562	7,908	4,349	24,819
Meeting the LDP Housing Land Supply Target				
Effective Supply	2,374	4,141	1,425	7,940
Constrained Sites coming forward	0	0	3,568	3,568
Housing Completions 2009 - 2016	4,012	0	0	4,012
Windfall	480	400	240	1,120
Demolitions	568	100	0	668
Total Supply from Existing Sources	6,298	4,441	5,233	15,972
Target to be met through new LDP allocations	6,264	3,467	-884	8,847
New LDP Allocations				
Total New LDP Allocations	489	1,362	77	1,928
Shortfall/Surplus	-5,775	-2,105	961	-6,919

The outcome of the West Lothian Draft 2016 Audit – Update to Figure 5 is as follows:

	2009-19	2019-24	2024-27	2009-27
Setting the LDP Housing Land Supply Target				
LDP Housing Supply Target	11,420	6,590	3,954	21,964
Generosity Allowance (10%)	1,142	659	395	2,196
LDP Housing Land Requirement	12,562	7,908	4,349	24,819
Meeting the LDP Housing Land Supply Target				
Effective Supply	3,380	3,838	1,464	8,682
Constrained Sites coming forward	0	0	2,294	2,294
Housing Completions 2009 - 2016	4,012	0	0	4,012
Windfall	480	400	240	1,120
Demolitions	568	100	0	668
Total Supply from Existing Sources	7,304	4,138	3,998	15,440
Target to be met through new LDP allocations	5,258	3,770	351	9,379
New LDP Allocations				
Total New LDP Allocations	810	2,516	20	3,346
Shortfall/Surplus	-4,448	-1,254	-331	-6,033

The Reporter will note that there is a shortfall in the housing land supply of between 6,033 homes and 6,919 homes over the LDP periods to 2027.

As a result, the Proposed LDP will not maintain a five years effective housing land supply at all times at the point of adoption.

Homes for Scotland respectfully requests that the Reporter allocate additional new housing land in the LDP to assist the Council in meeting its housing land requirement in full.

Question 1

Should the SDP's 'housing requirement' be regarded as a 'housing supply target' or 'housing land requirement' (i.e. already including an element of generosity) as defined by SPP 2014? Table 3.1 of the SDP Housing Land Supplementary Guidance refers to 'housing land requirement'.

1.1 Homes for Scotland does not agree with the Council's new interpretation of the approved Strategic Development Plan's (SDP) 'housing requirement' as stated in its response to FIR 03. The Council has now provided contradictory evidence to the LDP Examination.

1.2 The Council's Housing Land Position Statement (HFS Document 1) states at paragraph 5.1 that:

"SDP [1] identified Housing Supply Targets (HSTs) for each SESplan authority to use in preparing their LDPs to meet the housing requirements of SDP [1] and HLSG".

1.3 This Position Statement has been submitted by the Council to the LDP Examination as a Core Document and forms part of the Council's evidence base. It is clear that in preparing this Position Statement, the Council recognises the approved SDP's 'housing requirement' as the 'housing supply target' as defined in Scottish Planning Policy (SPP).

1.4 The Council reiterates this position on page 36 of the Schedule 4 for Issue 1A, stating that:

"It is acknowledged that the terminology used in the Proposed Plan (particularly when discussing issues relating to housing land supply and housing land requirements) is not always consistent with SPP 2014. This can in part be explained by the fact that the LDP was commenced when SPP 2010 was effective, not SPP 2014, and it was also prior to the publication of SESplan Supplementary Guidance on Housing Land (CD101). These events introduced changes to the terminology used in the Plan which have not been systematically implemented. Under these circumstances, the council would have no objection to the Reporter requiring the substitution of redundant words and terms to reflect those used in SPP 2014 should this be considered helpful in improving the legibility and understanding of the Plan. With particular regard to Figure 5 (page 22), the term 'Housing Supply Target' (HST) should replace references to 'Housing Requirement'. This would have the effect of line A being re-titled the 'West Lothian LDP Housing Supply Target' and line C changed to the 'LDP Housing Land Requirement'."

1.5 In preparing the Position Statement and the Schedule 4, the Council clearly acknowledges that the 'housing requirement' should be regarded as the 'housing supply target' in terms of SPP. This matter was discussed for Issue 05 of the Edinburgh LDP Examination Report (HFS Document 2) where the Reporter concluded that:

"The housing supply target is based on the HNSA but is a policy view of the number of homes that are needed by local authority area. SESplan predates current Scottish

Planning Policy so does not use the word target but refers to housing requirements and housing land requirements. However for the purposes of the examination there is nothing to suggest to me that the figures in SESplan should not be interpreted as the target”.

- 1.6 The Reporter concluded that the approved SDP’s ‘housing requirements’ are the ‘housing supply targets’.
- 1.7 Homes for Scotland considers that the approved SDP’s ‘housing requirement’ is the ‘housing supply target’ as defined by SPP and agrees with the statements made by the Council in its Position Statement and Schedule 4.
- 1.8 All available evidence before this LDP Examination confirms that the approved SDP’s ‘housing requirements’ are to be interpreted as the ‘housing supply targets’ defined by SPP.
- 1.9 We query why the Council is now presenting contrary position to the LDP Examination at this late stage in the process.

Question 2

Given that the LDP must comply with the adopted SDP, notwithstanding that SPP 2014 introduced a requirement for SDPs to include a 10 to 20% generosity allowance, is the addition of a generosity allowance in the LDP necessary and/or justified? Did the concept of generosity feature in SPP 2010 and did this influence the SDP housing requirement? Does the SDP housing supplementary guidance give any consideration to generosity?

- 2.1. Homes for Scotland does not support the approach to generosity as stated in the Council's response to FIR 03. Homes for Scotland considers that a generosity allowance within the LDP is both necessary and justified.
- 2.2. Given the evidence set out in response to FIR 03 Question 1 above, Homes for Scotland was content that the Council considered the approved SDP's 'housing requirement' to be the 'housing supply target' as defined by SPP. We were therefore content that the Council considered it necessary to add a generosity margin on top of this Housing Supply Target (HST) as required by SPP.
- 2.3. However, the Council has again contradicted its own evidence to the LDP Examination.
- 2.4. The Council's Schedule 4 for Issue 1A sets out a proposed replacement Figure 5 for the LDP. This clearly states the Housing Supply Targets for West Lothian and identifies a generosity allowance of 10% to be applied to the HST. Homes for Scotland agrees that this table meets the requirements of SPP in identifying a generosity allowance. Adding a generosity allowance of between 10% and 20% to the HST to achieve the Housing Land Requirement (HLR). Homes for Scotland acknowledged that the Council has adopted a 10% generosity allowance for the LDP, clearly accepting the need and justification for such an allowance.
- 2.5. The Council's Position Statement (HFS Document 1) paragraph 6.1 to 6.3 also acknowledge the need for a generosity allowance. The Position Statement states at paragraph 6.1 that the HLR is "*the sum of the number of new homes to be built plus a generosity allowance*".
- 2.6. The Council then continues:

"The introduction by Scottish Government of SPP in June 2014 altered the policy context in planning for new housing. SPP 2014 (paragraph 116) requires that the HST be augmented by a margin of 10-20% in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin depends on local circumstances and is a matter to be determined by the planning authority."
- 2.7. Paragraph 6.3 of the Position Statement acknowledges that a generosity allowance of 10% has been adopted for the LDP.
- 2.8. The concern set out in our submission to FIR 03 related to the selection of a minimum 10% generosity allowance. A robust justification has not been provided by the Council to support the selection of a minimum 10% generosity allowance as required

by SPP. Homes for Scotland assume that the minimum 10% generosity allowance has been adopted by the Council because it is the lowest acceptable percentage.

2.9. SPP paragraph 16 states that the HST:

“...should be increased by a margin of 10 – 20%...the exact extent of the margin will depend on local circumstances but a robust explanation for it should be provided in the plan”.

2.10. There have been 4,012 house completions in West Lothian from 2009-2016 which represents 50% of the HST for the period (7,994). Given the chronic undersupply of homes in West Lothian since 2009, we suggest that there is sufficient justification to raise the generosity allowance to 20% to maximise flexibility and ensure that a generous supply of land for housing is provided. This undersupply of housing is not because of the home building industry, but rather a consequence of the allocation of non-effective sites, a development strategy focussed on significant allocations in secondary and tertiary locations, and a lack of infrastructure planning by the Council.

2.11. In its response to FIR 03, the Council now suggests that *“the further addition of a generosity allowance in the LDP is not necessary”.*

2.12. We do not agree with this statement. SPP requires the addition of a generosity allowance of between 10% and 20%, which is the approved SDP’s ‘housing requirement’.

2.13. The Council has also agreed to the application of a generosity allowance to the HST in both its Position Statement and the Schedule 4 for Issue 1A.

2.14. We also note that the Council states:

“SDP1 indicates that land for a total of 107,560 homes will be required across the SESplan area in the period up to 2024, of which 74,835 houses are required by 2019. When incorporating the HNDA[1] figures into SDP 1, SESplan set the LDP Housing Supply Target for the West Lothian LDP at more than 9% higher than the ‘robust and credible’ HNDA[1] requirement of 16,510”.

2.15. We welcome the acknowledgement that the Council agrees that *“SESplan set the LDP Housing Supply Target for the West Lothian LDP...”* Homes for Scotland agrees that the approved SDP set the HST.

2.16. Homes for Scotland notes that this statement contradicts the position set out by the Council in response to Question 1 of the FIR 03.

2.17. However, we disagree with the Council’s interpretation that Housing Need and Demand Assessment (HNDA) presents a ‘robust and credible’ requirement as suggested by the Council. The HNDA process does not identify a requirement of any kind. The HNDA is an estimate of the future need and demand for housing.

2.18. The HNDA only outputs estimates of housing need and demand based on a number of varying scenarios. The estimates of housing need and demand are then considered by the SDPA, one of the estimates chosen, and a policy position added to

that relevant HNDA estimate to reach the HST. A generosity allowance is then applied to the HST will be added to provide the HLR.

- 2.19. The HNDA Manager's Guide (2014) (HFS Document 10) clearly sets out the relationship between an HNDA and a HST. The table below is taken directly from the HNDA Manager's Guide.

9. What is the relationship between an HNDA and a Housing Supply Target?
<p>9.1 The HNDA provides the evidence on which an HST(s) is based. While it is expected that there is a clear alignment between the HNDA and the HST the two are not the same and are therefore not expected to match.</p>
<p>9.2 The HST will take the HNDA as its starting point, but will consider policy and practical considerations to reach a view on the level of housing that can actually be delivered over a defined period.</p>
<p>9.3 The HNDA gives a statistical estimate of how much additional housing is required, whereas the HST gives an estimate of how much additional housing can be actually be delivered by authorities (see figure 3).</p>
<p>9.4 The HST is NOT part of the HNDA process.</p>

Extract from HNDA Manager's Guide (2014)

- 2.20. The assessment of the HNDA as 'robust and credible' relates to the process and methodology of the HNDA itself, not to any estimate provided by the HNDA. Under the heading of 'robust and credible appraisal', paragraph 1.7 of the HNDA Practitioner's Guide (2014) (HFS Document 11) clarifies that the appraisal of the HNDA will be made of the "process and methodology used to produce HNDAs...", and paragraph 1.8 states "It should be noted, that the appraisal process does not extend to agreeing the estimates themselves".
- 2.21. It is therefore incorrect for the Council to refer to a "'robust and credible' HNDA[1] requirement".
- 2.22. SPP confirms at paragraph 115 that the HST is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan and local housing strategy, taking into account wider economic social and environmental factors, issues of capacity, resource and deliverability, and other important requirements. The HST may be higher, or lower, than the HNDA estimate. Again, we note that the HST and HNDA estimates do not require to be the same as one another due to the policy judgement made of the chosen HNDA scenario, and resulting HST derived from these judgements.
- 2.23. The Council states that the approved SDP HST for West Lothian is 9% higher than the HNDA and asserts that this represents a generosity allowance in Figure 1 of the Council's response.

- 2.24. Homes for Scotland disputes this claim. The additional 9% above the HNDA estimate for West Lothian is based on a policy decision made for the approved SDP based on the number of homes that can be delivered.
- 2.25. The policy view was made for SESplan to distribute some of Edinburgh's housing need and demand to the other local authorities. The 9% that the Council refers to is this policy decision and is not generosity allowance.
- 2.26. This point is explained at paragraph 8, page 384 within the LDP Examination Report for the Scottish Borders LDP, Issue 080 (HFS Document 12):

"The updated Appendix 2 states at paragraph 3.7 that the SESplan SG requirement for the Scottish Borders of 9,650 units in the period 2009-2019 and 3,280 units in the period 2019-2024 is significantly in excess of the 'robust and credible' requirement set in the SESplan HNDA. I agree that over the period 2009-2024 this equates to 48% in excess of the HNDA requirement. I note, however, that this includes a contribution towards meeting the Edinburgh housing land requirement which, due to stated constraints, is not able to be met there."

- 2.27. The Reporter notes that the requirement within the SESplan Supplementary Guidance for the Borders is in excess of the HNDA estimate, but reasons this is due to the contribution towards meeting Edinburgh's need and demand.
- 2.28. As a member authority of SESplan which agreed to this policy decision, we query why the Council is now presenting this contrary position to the LDP Examination at this late stage in the process.

Question 3

What options for calculating the housing land requirement for the remainder of the 10-year plan period beyond 2024 are available, and which of these options should be applied to the plan? The council suggests this calculation should be based on HNDA[2].

3.1. Homes for Scotland does not consider that HNDA[2] or the emerging SDP 2 legitimate considerations for this LDP Examination. We therefore disagree with the Council's response to FIR 03.

3.2. We have set out our evidence to Question 3 in our submission to FIR 03.

3.3. However, it is noted that the Council has again contradicted its own evidence as stated in its Position Statement (HFS Document 1) submitted to the LDP Examination.

3.4. The Position Statement states at paragraph 5.4:

“Since publishing the Proposed Plan it has been acknowledged that a requirement of SPP 2014 (paragraph 119) is to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption, the implication being that an additional housing supply target also needs to be identified for the period from 2024 to 2027 (on the assumption that the West Lothian LDP is adopted in 2017)”.

3.5. Paragraph 5.5 states:

“SDP[1] does not set a HST beyond 2024, however it is understood from the outcome of other LDP Examinations that it is regarded by the DPEA as a legitimate requirement under these circumstances and that an appropriate allowance should be identified. It is therefore necessary to establish a figure which satisfies assessed need and demand for the period 2024-2027”

3.6. Homes for Scotland agrees with the Council's original position, as set out in paragraphs 5.4 and 5.5 of the Position Statement.

3.7. The Council has yet again fundamentally changed its position in its response to FIR 03. We consider that the Council's response to the FIR is incorrect and should be disregarded.

Question 4

How should the required 5-year effective land supply be calculated where this would span SDP periods? What options are available and which of these should be favoured, and why?

- 4.1. The Council refers to the Scottish Government's draft Planning Delivery Advice: Housing and Infrastructure. This is not a relevant consideration as it is a draft document, and the Scottish Government has confirmed that this is a consultation document only, with no material status. Any reference to this draft document should be disregarded in this LDP Examination.
- 4.2. The Council refers to the Draft 2016 Audit (Version 6, April 2017). For the reasons set out in the introduction of this Supplementary Response, this Draft Audit 2016 is disputed by Homes for Scotland and we respectfully request that the Reporter attribute no weight to this new Council document.
- 4.3. Homes for Scotland disagrees with both Method 1 and Method 2 as set out in the Council's response.
- 4.4. Method 1 relies on the draft Planning Delivery Advice, and disregards the shortfall in completions to date. Scottish Government has confirmed that the draft Planning Delivery Advice is not finalised nor is it adopted. The Council is aware of this position.
- 4.5. Critical to the calculation of the five year effective housing land supply is the consideration of completions to date from agreed housing land audits. This is the only means to ensure that a Local Development Plan provides for a minimum of five years' effective land supply at all times. This is a requirement of the approved SDP and SPP.
- 4.6. Method 1 is therefore unacceptable to Homes for Scotland, as this does not result in a calculation to ensure that a five year effective housing land supply is maintained at all times.
- 4.7. Method 2 as set out by the Council is unacceptable. The Council has averaged out the annual HST in boxes 'd' and 'e' over an 8 year period and then multiplied by 5 which reduces the five year HST by spreading the shortfall out over a 8 year period rather than five years.
- 4.8. The Council is well aware of the correct method to determine whether a five years' land supply is maintained at all times and the correct method is adopted by the SDPA and was reported to the SESplan Joint Committee on 13th March 2017 (HFS Document 4).
- 4.9. The SDPA has evaluated whether a five year effective housing land supply is maintained at all times in West Lothian based on the Draft 2016 Audit for external consultation (HFS Document 7). This housing land supply position was reported to the SESplan Joint Committee on 13th March 2017 (HFS Document 4).

- 4.10. The SESplan 2016 Annual Housing Update confirms that a five year effective housing land supply is not maintained in West Lothian, confirming that there is a shortfall in the five year effective housing land supply of 2,327 homes. This is set out in the column Delivery Output of Table 6 *Housing land supply and delivery programme* (HFS Document 4).
- 4.11. This is based on the Draft 2016 Audit from December 2016 (HFS Document 7). This Draft 2016 Audit includes programming of all new allocations set out in the Proposed LDP before this Examination.
- 4.12. As set out in our response to this FIR 03, Homes for Scotland supports the method presented by Geddes Consulting on behalf of Wallace Land Investments. This method which clearly and concisely sets out the methodology to calculate whether a five year effective housing land supply where this spans two SDP periods.

Step	Description of Calculations	Method
A	Housing Supply Target for plan period 1 from Development Plan	
B	Housing Completions to date to date from agreed Housing Land Audit	
C	Remaining Housing Supply Target for plan period 1	A - B
D	Housing Supply Target for plan period 2 from Development Plan	
E	Annual Average Housing Supply Target for plan period 2, where Y = number of years in plan period 2	D / Y
F	Housing Supply Target to be met for plan period 2, where Z = number of years remaining in the five year period under assessment	E x Z
G	Five Year Housing Supply Target	C + F
H	Five Year Effective Housing Land Supply from Housing Land Audit	
	Shortfall/Surplus in Five Year Effective Housing Land Supply	G - H
	Number of Years Supply	(H / G) x 5
	Percentage of Five Year Housing Supply Target Met	(H / G) x 100

- 4.13. Homes for Scotland adopts this methodology consistently across Scotland to calculate whether a five years land supply is maintained.
- 4.14. For the purposes of this Supplementary Response, Homes for Scotland has replicated the calculation adopted by the SESplan SDPA for all member authorities to determine whether a five years housing land supply is maintained in West Lothian. The Draft 2016 Audit (HFS Document 7) has been adopted to compare the outcome of this calculation against the outcome reported by the SDPA Manager.
- 4.15. The *Summary* table of the Draft 2016 Audit identifies a five year effective supply of 7,717 homes from 2016/17 to 2020/21.
- 4.16. The Completions table of the Draft 2016 Audit identifies housing completions of 797 homes in 2015. Added to the 3,215 completions from previous housing land audits, there have been 4,012 completions between 2009/10 and 2015/16.
- 4.17. The HST as set out in the approved SDP is 11,420 homes for the period 1 (2009 to 2019) and 6,590 homes for period 2 (2019 to 2024).

Step	Description of Calculations	Outcome	Method
A	Housing Supply Target for plan period 1 from Development Plan	11,420	
B	Housing Completions to date to date from Housing Land Audit	4,012	
C	Remaining Housing Supply Target for plan period 1	7,408	A - B
D	Housing Supply Target for plan period 2 from Development Plan	6,590	
E	Annual Average Housing Supply Target for plan period 2, where Y = number of years in plan period 2 = 5	1,318	D / Y
F	Housing Supply Target to be met for plan period 2, where Z = number of years remaining in the five year period under assessment = 2	2,636	E x Z
G	Five Year Housing Supply Target	10,044	C + F
H	Five Year Effective Housing Land Supply from Housing Land Audit	7,717	
	Shortfall/Surplus in Five Year Effective Housing Land Supply	-2,327	G - H
	Number of Years Supply	3.8	(H / G) x 5
	Percentage of Five Year Housing Supply Target Met	77%	(H / G) x 100

- 4.18. The shortfall in the five year effective land supply is 2,327 homes or an effective housing land supply of only 3.8 years. This represents 23% of the HST unmet.
- 4.19. This method calculates an identical shortfall to that reported to the SESplan Joint Committee on 13th March 2017 by the SESplan SDP Manager.
- 4.20. Both SESplan SDPA and Homes for Scotland agree on the method to calculate whether a five year housing land supply is maintained. The assessments undertaken by both SESplan SDPA and Homes for Scotland confirm that there remains a significant shortfall in the five year effective housing land supply as established by the Council's baseline position set out in the Draft 2016 Audit.
- 4.21. Homes for Scotland has prepared the Finalised Homes for Scotland 2016 Audit (HFS Document 8). This version of the 2016 Audit adopts the Council's own agreed baseline housing land supply provided for external consultation on 15th December 2016 (HFS Document 7), which was reported to the SESplan Joint Committee on 13th March 2017 (HFS Document 4). It has then been modified based on the Council's 7th April late draft Audit and two meetings with the Council whereby HFS negotiated and discussed a number of sites. HFS has either disputed or accepted, based on proven justification and reasoning, a number of sites put forward at the last stage draft for by the Council for inclusion into the Audit. HFS justification for disputed sites in its Finalised Homes for Scotland 2016 Audit is set out in the submitted HFS Document 9.

4.22. Adopting the same method as the SDPA, the outcome is as follows:

Step	Description of Calculations	Outcome	Method
A	Housing Supply Target for plan period 1 from Development Plan	11,420	
B	Housing Completions to date to date from Housing Land Audit	4,012	
C	Remaining Housing Supply Target for plan period 1	7,408	A - B
D	Housing Supply Target for plan period 2 from Development Plan	6,590	
E	Annual Average Housing Land Requirement for plan period 2, where Y = number of years in plan period 2 = 5	1,318	D / Y
F	Housing Supply Target to be met for plan period 2, where Z = number of years remaining in the five year period under assessment = 2	2,636	E x Z
G	Five Year Housing Supply Target	10,044	C + F
H	Five Year Effective Housing Land Supply from Housing Land Audit	5,801	
	Shortfall/Surplus in Five Year Effective Housing Land Supply	-4,243	G - H
	Number of Years Supply	2.9	(H / G) x 5
	Percentage of Five Year Housing Supply Target Met	58%	(H / G) x 100

4.23. The shortfall in the five year effective land supply is 4,243 homes or an effective housing land supply of only 2.9 years. This represents 42% of the HST unmet.

Question 5

If the SDP plan periods must be treated separately, as contended in representations, would it be legitimate for any shortfall in completions and/or effective land supply (if applicable) in the 2009 – 2019 period to be disregarded in the second period (2019 – 2024) when calculating the amount of housing land required?

- 5.1. Homes for Scotland disagrees with the Council's response. The Council does not give any justification to disregard the shortfall from 2009 to 2019 in the second period (2019 to 2024) when calculating the amount of housing land required. As detailed in our response to FIR 03, the Reporter in the Edinburgh LDP Examination agreed that completions to 2019 should not be disregarded.
- 5.2. The Council, as one of the SESplan authorities, approved the SDP which set out the HST for West Lothian to 2024. Disregarding any shortfall in delivery on the SESplan targets would be contrary to SESplan, and therefore unacceptable.
- 5.3. The SDPA Manager, as reported to the SESplan Joint Committee on 13th March 2017, considers that shortfalls should not be disregarded.
- 5.4. Again, the Council seeks to refer to HNDA[2] in its response and we reiterate that this is not a relevant consideration for this LDP. The LDP is required to comply with the approved SDP not a future HNDA or emerging SDP which has not been scrutinised at Examination and approved by Ministers. The Council is aware of the statutory requirements of the Scottish planning system.
- 5.5. In response to the Council's comments on programming by the development industry within the housing land audit, Homes for Scotland works closely with its Member home builders to respond to draft audits across Scotland and responds to draft audits with amended programming from members to ensure that the snapshot in time of the audit is as accurate as possible. Members are encouraged to respond to draft audits with accurate programming based on their anticipated programming at the base date of that Audit.
- 5.6. Homes for Scotland's Housing Land Audit Procedures (HFS Document 6) sets out default assumptions on maximum annual completion rates which we use unless up-to-date industry evidence is available. For detached or semi-detached units on an urban site, Homes for Scotland will assume 30 units per annum (or 24 per annum if there is no developer). This position is adopted in the absence of 'live' information from a member company.

Question 6

In the event of there being less than a 5-year effective land supply at any point during the plan period, does Policy HOU2 (and/or Policy HOU3) and/or SDP Policy 7 provide an appropriate policy response? Please give reasons for your answer and outline any alternative / additional policy provisions you consider to be necessary.

- 6.1. Homes for Scotland does not consider that the amendments proposed by the Council to Policy HOU 3 are appropriate. Including text relating to 'Core Development Areas' is not sufficient to provide the necessary policy response in the event of less than a minimum five years effective land supply being maintained over the plan period. This policy refers to land within settlements and / or Core Development Areas, and does not mention greenfield development.
- 6.2. We acknowledge that SESplan Policy 7 does set out an appropriate policy response in setting out the conditions under which greenfield development may be granted planning permission to maintain a five years effective housing land supply.
- 6.3. However Homes for Scotland suggests that wording should be added to Policy HOU 2 or Policy HOU 3, or a new policy added to support housing release if a five years effective housing land supply is not maintained.
- 6.4. This is the only means to ensure that SESplan Policy 7 is part of the policy framework within the LDP and that the LDP complies with this Policy.
- 6.5. Homes for Scotland has provided wording of a suitable policy in our response to FIR 03. This policy was recommended by the Reporter for the Edinburgh LDP Examination.
- 6.6. We also consider that further allocations will be necessary to ensure that a five years effective land supply can be maintained at all times, to be compliant with the approved SDP Policy 5 as well as SPP paragraph 119. Allocating additional land for housing in the LDP is preferred to support delivery of homes in West Lothian as soon as possible. As noted in response to Question 5, there is a shortfall in the five year effective housing land supply. Relying solely on a policy which seeks to rectify a failure to maintain the five years effective housing land supply is reactive and does not allow for a plan led system.
- 6.7. The Council also refers to HNDAs in its response. We do not agree that policy provision should be made in the LDP relating to HNDAs. The HNDA output estimates are not confirmed to be the 'robust and credible' but only the process and methodology to generate the various scenarios. The HNDA identifies a number of estimates based on different scenarios. It is not appropriate for the LDP to select a preferred scenario and make provision for this HNDA estimate within an LDP policy.
- 6.8. The HNDA is the base evidence used by the SDPA to set the HST, along with a number of policy decisions made on the deliverability of the estimates within the HNDA and other factors.

Question 7

Should there be a reference in the plan to explain how the housing land requirement in any future adopted SDP would be applied to the calculation of a 5-year effective housing land supply?

- 7.1. Homes for Scotland does not agree with the Council's response. We do not consider that there should be a reference in the LDP to explain how the housing land requirement in any future approved SDP would be applied to the calculation of the five year effective housing land supply.
- 7.2. Any future emerging SDP is not relevant for the Proposed LDP, which is required to comply with the approved SDP.
- 7.3. We would reiterate (as evidenced in our response to Question 2) that the Scottish Government has not confirmed the HNDA figures to be robust and credible. As confirmed in paragraph 1.7 of the HNDA Practitioner's Guide (HFS Document 11), the 'robust and credible' assessment refers to the process and methodology. Paragraph 1.8 states *"It should be noted, that the appraisal process does not extend to agreeing the estimates themselves"*.
- 7.4. HNDA 2 produced a number of estimates based on different scenarios. The emerging SDP 2 set out a HST based on a mixture of these estimates, however this plan is yet to be scrutinised at Examination. The SDP 2 chosen HNDA scenario and subsequent HST will be considered as part of the Examination process which is yet to take place. It is therefore inappropriate for a reference to HNDA2 to appear in this LDP as it would be contrary to the statutory requirements of the Scottish planning system.
- 7.5. Homes for Scotland considers that no weight be attributed to emerging SDP 2 and its associated HNDA 2 in the determination of this LDP Examination. Determination of this Examination should be assessed against only the policy requirements of the approved SDP. All reference to HNDA2 should be removed.
- 7.6. This is in accord with the conclusions reached for East Dunbartonshire LDP Examination (HFS Document 3).

Question 8

If the principle of including a generosity allowance within the LDP is accepted, a robust explanation is required in the plan to justify the 10% figure chosen. Please can the council provide suggested wording to this effect, and identify where this could be included in the plan, over and above the explanation in paragraph 6.3 of the council's housing land position statement.

- 8.1. Homes for Scotland disagrees with the Council's response. The Council has not provided a robust explanation in the plan to justify the 10% figure chosen.
- 8.2. Homes for Scotland considers that no weight be attributed to emerging SDP 2 and its associated HNDA 2 in the determination of this LDP Examination. Determination of this Examination should be assessed against only the policy requirements of the approved SDP. All reference to HNDA2 should be removed.
- 8.3. However, if the Reporter is minded to accept the Council's Position Statement as a rationale, and in accord with paragraph 119 of SPP, the following text should be added to paragraph 5.47:

“For the West Lothian LDP, a minimum generosity allowance of 10% has been adopted in accord with other SESplan authorities. This generosity allowance secures the allocation of a range of sites to enable the housing supply target to be met and maintain a five years effective housing land supply at all times.”

Question 9

Please can the council clarify what it considers to be the practical benefits or implications of the proposed plan's references to HNDA[2], given that the plan acknowledges that the LDP must conform to the adopted SDP.

- 9.1. Homes for Scotland disagrees with the Council. Reasons are already set out in this Supplementary Response.
- 9.2. Homes for Scotland considers that no weight be attributed to emerging SDP 2 and its associated HNDA 2 in the determination of this LDP Examination. Determination of this Examination should be assessed against only the policy requirements of the approved SDP. All reference to HNDA2 should be removed.
- 9.3. This is in accord with the conclusions reached for East Dunbartonshire LDP Examination (HFS Document 3).

Question 10

Please can the intention of the final sentence of paragraph 5.41 in the proposed plan be clarified?

- 10.1. Homes for Scotland disagrees with the Council. Reasons are already set in this Supplementary Response.
- 10.2. Homes for Scotland considers that no weight be attributed to emerging SDP 2 and its associated HNDA 2 in the determination of this LDP Examination. Determination of this Examination should be assessed against only the policy requirements of the approved SDP. All reference to HNDA2 should be removed.
- 10.3. This is in accord with the conclusions reached for East Dunbartonshire LDP Examination (HFS Document 3).

Question 11

The housing land supply calculation presented in Figure 5 includes an allowance for “constrained sites coming forward”. Appendix 1 of the council’s housing land position statement identifies those sites for which the council has altered the status relative to that agreed in the 2014 HLA. For each constrained site anticipated by the council to come forward, a site-specific reasoned justification for the re-phasing of expected completions is required.

- 11.1. Homes for Scotland disputes the rationale offered by the Council in its response and has provided commentary on each site, detailing our dispute or agreement on the table of listed sites submitted by the Council in response to FIR 03. HFS Document 14 provides this commentary in a column added to the Council’s ‘figure 4’ table of listed constrained sites which are anticipated by the Council to come forward.
- 11.2. A large number of these sites were identified by the Council as Constrained / Non-Effective in its Draft 2016 Audit published for external consultation on 15th December 2016. Further sites within the Council’s Figure 4 are suggested by the Council to be able to come forward to deliver homes within the 5-year effective period, which are in fact still considered to be constrained by the Council in its disputed final 2016 Audit.
- 11.3. A site can only be expected to become effective if it can demonstrate that it can meet the tests of PAN 2/2010 Affordable Housing and Housing land Audits. Within its Figure 4 table, the Council has not provided adequate rationale to demonstrate how constraints have been overcome to show that these sites are effective in terms of PAN 2/2010.
- 11.4. The Reporter should note that the Position Statement and its associated Housing Land Supply Review (HFS Document 5) referred to by the Reporter in this question have been rejected at Appeal by DPEA Reporters. This is due to their non-conformity with either the Agreed 2014 Audit or Draft 2015 Audit.
- 11.5. The Council provided similar evidence to Homes for Scotland to support its late draft Audit on 7th April 2017 which was vastly different from the December 2016 draft. We would note that the consideration for the 2016 HLA will be different from the consideration as to whether a site can come forward within the plan period. The 2016 Audit is a snapshot in time of 31st March 2016, therefore applications submitted, or appeals granted after this date signify movement on a site and the potential for that site to deliver, but will not be relevant for the 2016 Audit which has a clear cut-off point.
- 11.6. There are therefore two relevant documents submitted by Homes for Scotland in relation to this question. The first is the Finalised HFS 2016 Audit – Justification of Disputed Sites (HFS Document 9) which sets out the HFS reasoning for each site disputed in the 2016 Audit. The second is the West Lothian Figure 4 as amended by HFS – Commentary on 2014 Constrained Sites identified in the LDP (HFS Document 14).
- 11.7. Homes for Scotland is concerned that if the Reporter accepts the Council’s position as stated in Draft Audit 2016 (April 2017, Version 6) that these sites are now effective, contrary to the baseline position presented by the Council for external consultation on 15th December 2016, the whole housing land audit process is significantly undermined.
- 11.8. The Reporter should note that SESplan Policy 5 states “*existing housing sites which are assessed as being constrained, but also capable of delivering housing*”

completions in the period 2024 to 2032, should be safeguarded for future housing development.”

- 11.9. There is no evidence was presented by the Council that would contradict the expectation from both the Council and Homes for Scotland that these Constrained sites will contribute to the housing land supply before 2023/24 as set out in the Draft Audit 2016 (HFS Document 7).
- 11.10. Accordingly, *Constrained* sites should not be programmed in any assessment to meet the housing land requirement or housing supply target unless evidence can be presented that would suggest that the constraint can be overcome over the period of the plan. These sites can be safeguarded with completions expected post 2024 in accord with SESplan Policy 5.

Question 12

Should row (E) in Figure 5 be renamed “Supply from sites expected to become effective”?

- 12.1. Homes for Scotland disagrees with the Councils response that the row (E) in Figure 5 could be substituted to “Supply from sites expected to become effective”.
- 12.2. A site can only be expected to become effective if it can demonstrate that it can meet the tests of PAN 2/2010 Affordable Housing and Housing Land Audits. A site is only expected to be effective if it is demonstrated that the constraint can be overcome.
- 12.3. Homes for Scotland agrees with the Council that Figure 5 needs to be reflective of that used in its Housing Land Audits and which distinguishes between “effective” and “constrained” sites.
- 12.4. We consider that the name of row (E) should remain.

Question 13

Figure 5 is based on HLA 2014 data. What is the status of HLA 2015 and HLA 2016? What figures would be included in Figure 5 if based upon the most recent HLA?

- 13.1 Homes for Scotland has been actively engaging with West Lothian Council over the past year on the 2015 and 2016 Housing Land Audits. HFS submitted comments to the draft 2015 Audit in July 2016. The Council did not come back to HFS on this Audit to discuss comments. The Council emailed HFS on 16th September 2016 stating that progress on the 2015 Audit was not to be pursued further. Contrary to the Council's response to this question of the FIR, Homes for Scotland did, in fact, contest this position, asking the Council to progress to completion of the 2015 Audit in tandem with the 2016 Audit. This was dismissed by the Council, and it was published on the West Lothian Council Website as a disputed Audit.
- 13.2 Homes for Scotland received the Council's draft 2016 Housing Land Audit in December 2016, and progressed this Audit by submitting comments on the draft to the Council and meeting with the Council to discuss outstanding queries on programming in February 2017.
- 13.3 Following this meeting with the Council, Homes for Scotland prepared an updated draft Audit in March 2016 highlighting agreed sites between HFS and the Council, and also sites for which there remained queries / issues. This was in line with the December 2016 draft and updated to reflect the discussion at the February 2017 meeting. This Audit was progressing well and HFS expected to agree this Audit before the LDP Examination Hearing on housing land to ensure that the final agreed 2016 Audit could be used by the Reporter.
- 13.4 On 7th April 2017, Homes for Scotland received a late revised draft 2016 Audit from West Lothian Council which differed vastly from the December 2016 draft. A large number of sites considered by the Council to be constrained in the December 2016 draft were moved to the effective supply, and programmed to deliver within the 5 year effective period. Over 2,000 homes have been added to the 5 year effective period by the Council between the December and April draft HLAs for which HFS disputes the legitimacy of their inclusion in the effective housing land supply, and consider that justification has not been provided to evidence how constraints were overcome by the end date of the Audit – 31st March 2016.
- 13.5 Homes for Scotland disputes a large number of the constrained sites brought back into the effective land supply by the Council at a late stage in the Audit negotiations, and would note that this draft Audit was sent to HFS by the Council after the Council had the benefit of reviewing the HFS submission to this FIR at the start of April, and had time to consider the Reporter's request for further information in relation to constrained sites.
- 13.6 Homes for Scotland also disputes a number of sites in the Council's final HLA on the grounds of education infrastructure issues (HFS Document 9).
- 13.7 We recognise that the 2014 HLA is significantly out of date, and acknowledge that the 2015 Audit was not progressed to a final form, but published in draft form without agreement sought and negotiated with HFS, and that the Council's final version of the 2016 HLA is highly contested. Homes for Scotland therefore considers that the Finalised Homes for Scotland 2016 Audit (HFS Document 8) or the Council's original draft Audit from December 2016 (HFS Document 7) should be used to update Figure 5 of the LDP.

Question 14

How have site capacities been calculated? What assumptions have been made and have these been applied consistently?

14.1. Homes for Scotland notes the Council's comments.

Question 15

How many units have been consented and completed annually since 2009 on windfall sites?

- 15.1. Homes for Scotland notes the Council's comments.
- 15.2. As demonstrated earlier, the Council is not maintaining a five year effective housing land supply at all times. This has been confirmed at Appeals since 2013.
- 15.3. The Reporter will note the low windfall completions.
- 15.4. It is the opinion of Homes for Scotland's members that the Council will not determine that there is shortfall in the five year effective housing land supply and therefore does determine applications against the provisions of the SESplan SDP, SPP, and other material considerations.
- 15.5. The Council requires a five year land supply policy in the LDP. This is the only means to ensure that SESplan Policy 7 is part of the policy framework within the LDP and that the LDP complies with this Policy.
- 15.6. Homes for Scotland has provided wording of a suitable policy in our response to FIR 03. This policy was recommended by the Reporter for the Edinburgh LDP Examination.

Question 16

How many units have been demolished annually since 2009?

16.1. Homes for Scotland notes the Council's comments.

Question 17

The council suggests the 2024 – 2027 housing land requirement should be based on HNDA[2]. In the context that the adopted SDP requires West Lothian to meet some of the identified demand from the wider region, why does the council consider this to be the most appropriate option for calculating the requirement beyond 2024 to reflect the 10-year LDP plan period?

- 17.1. Homes for Scotland disagrees with the Council. Reasons are already set in this Supplementary Response.
- 17.2. Homes for Scotland considers that no weight be attributed to emerging SDP 2 and its associated HNDA 2 in the determination of this LDP Examination. Determination of this Examination should be assessed against only the policy requirements of the approved SDP. All reference to HNDA2 should be removed. This is in accord with the conclusions reached for East Dunbartonshire LDP Examination (HFS Document 3).
- 17.3. The HST for 2024 to 2027 should be set by the same methodology for the Edinburgh LDP Examination as set out in our response to FIR 03. This has been endorsed by Scottish Ministers through the adoption of Edinburgh LDP.
- 17.4. It is the opinion of Homes for Scotland that this approach should also be applied to West Lothian LDP.
- 17.5. Any other option would mean that the identified housing need and demand for the period 2024 to 2032 would not be met. This would be contrary to the approved SDP.
- 17.6. Adopting this approach for West Lothian LDP, the figure for 2024/25, 2025/26 and 2026/27 is derived by dividing the housing supply target for the period 2019 to 2024 (6,590 homes) by 5 (1,318 homes) and multiplying by three to arrive at the total of 3,954 homes.

Question 18

In the Schedule 4, the council has stated that it would be agreeable to deleting part of Policy HOU2. Please can the council clarify which part of the policy it is referring to, as the strike-through text referred to has not been provided.

18.1. Homes for Scotland disagrees with the Council's modification to Policy HOU 2.

18.2. Homes for Scotland recommends the following modification to Policy HOU 2:

The council will ~~endeavour to maintain a 5-year supply of land for housing that is effective or can be shown to be capable of becoming effective at all times throughout the lifetime of the plan. An annual audit of the housing land supply prepared on a sectoral basis (agreed with housing providers) and will monitor and review the land supply in accordance with the SPP 2014 and the Strategic Development Plan. Where it can be demonstrated that the Council is not maintaining a five years effective housing land supply at all times, residential development will be granted on greenfield sites if the sustainability of the proposal accords with the guiding principles of sustainable development set out in SPP and with LDP Policy HOU3.~~

~~Proposals for housing development will require to accord with the proposed phasing detailed in Chapter 6 and the related LDP Action Programme. Sites identified in Chapter 6 for longer term expansion are embargoed from development during the period of the Local Development Plan and shall be safeguarded unless required to contribute to the five year effective supply and any infrastructure required as a result of the development is either committed or to be funded by the developer. Proposals coming forward in advance of any identification of a shortfall in the effective housing land supply will be treated as premature only if they undermine the development strategy of the LDP.~~

18.3. In addition, paragraph 5.52 states "Figure 5 is set out to comply with requirements of SPP 2010 and the SESplan Supplementary Guidance on Housing". This reference to SPP 2010 should be amended to refer to the new SPP 2014.

18.4. Policy HOU2 as drafted does not indicate what action the Council will take in the event of a failure of the land supply and the proposed policy therefore will not have the effect of ensuring that a 5-year effective supply will be maintained. In the event of a failure in the 5-year effective housing land supply a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32-35 and this should be reflected in the Plan.

18.5. This approach and modification accord with the policy requirements of the approved SDP and SPP.

Question 19

Would the sectoral approach to housing land audits referred to in Policy HOU2 have any practical implications over how the overall 5-year effective supply of land is to be calculated? If so, what would these implications be?

- 19.1. Homes for Scotland disagrees with the Council's response. Reasons are already set in this Supplementary Response.
- 19.2. Homes for Scotland considers that no weight be attributed to emerging SDP 2 and its associated HNDA 2 in the determination of this LDP Examination. Determination of this Examination should be assessed against only the policy requirements of the approved SDP. All reference to HNDA2 should be removed.
- 19.3. This is in accord with the conclusions reached for East Dunbartonshire LDP Examination (HFS Document 3).
- 19.4. The approved SDP does not require the LDP to be calculated on sectoral approach. The five year effective housing land supply is required by the approved SDP to be calculated against the 'housing requirement' or HST.
- 19.5. The approved SDP does not define the 'housing requirement' or HST' on a sectoral basis. Adopting this approach would be contrary to the statutory requirements of the approved SDP.

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