

Housing Land Audit 2025 Report



Introduction

Housing Land Audit '25 (HLA '25) provides a snapshot of the amount of land available for the construction of housing as at 31 March 2025.

Preparation of HLA '25 began in August 2025 and was widely consulted on in October 2025. The consultation included a draft HLA'25 and a 'housing delivery route map questionnaire'. This was designed to capture key information on site status, constraints, programming and delivery actions.

This audit has been carried out to comply with [Scottish Government Housing Land Audit Guidance, January 2025](#).

The Housing Land Audit is made up of three main components;

1. Report
2. Excel Spreadsheet
3. Map of HLA sites (link to GIS)

Consultation Process

The consultation process involved preparing a draft housing land audit. For every site that is included in the audit, the known contact (developer, agent or landowner) is sent a copy of the draft audit and a 'housing delivery route map questionnaire' and asked to

1. Complete the questionnaire for your site(s), including details of ownership, planning status, infrastructure requirements, funding and delivery programming.
2. Review the draft HLA figures (site capacity, tenure split, programmed completions) and provide any amendments or comments.
3. Identify any constraints to delivery and the actions needed to resolve them.

Comments are taken into consideration and then a further draft is issued to Homes for Scotland for a further round of comments. An in-person meeting with Homes for Scotland and HFS members took place in December 2025. A further round of revises took place.

An on-line meeting also took place with the landowner and their advisors of H-AM 8, H-AM 14 and H-AM 19, Armadale to discuss the dispute surrounding the classification of the sites as non-deliverable.

The following sites remain disputed;

HLA Ref: 130 / 130A Greendykes Road (West), Broxburn, M2 Developments

M2 Developments position: M2 disputes the out-of-date housing unit numbers in the HLA and invites the LDP team to refresh the HLA to reflect the 750 unit capacity in the combined H-BU 8 and H-BU 9 sites – see M2 updated numbers (see M2 extract spreadsheet accompanying this document submission 24 October 2025).

Council Response: Scottish Government HLA guidance stipulates – 'Site capacity: this should be the total capacity in the LDP, then updated to total capacity of the planning permission when available, and then the remaining capacity of sites when under construction'. M2 do not have planning permission for the 750 units, therefore the capacity in the audit reflects the capacity set out in LDP. However, an extra column has been added to signify further potential, however this does not count towards the deliverable and deliverable with constraints land supply.

HLA Ref 93, 94, 97, 98 and 100. H-AM 8, H-AM 14 & H-AM 19. Tarrareoch Farm, Southdale, Trees Farm, Armadale

The landowners dispute the classification on the sites in 'non-deliverable' due to 'No funded education solution. The Council's position is that the developer cannot realistically provide the required infrastructure for future phases given that there is an outstanding education payment' and 'until such a time as all historic outstanding contributions are made, the sites will be assessed as non-effective due to infrastructure constraints'.

The landowner through email and a meeting has sought to provide comfort that the constraint will be removed and the site should therefore be classified as deliverable.

Council's position: At the audit date (31st March 2025), the outstanding education payment remained unpaid, therefore the council have no confidence at the audit date that there is a funded education solution.

HLA Ref 216 – 237, H-WH3, Heartlands, Whitburn

HFS Dispute: 'The action for HFS was to get an update from members on the proposed start date given that it was linked to the delivery of the distributor road. I can advise that based on feedback there is an expectation that the distributor road will be in place in time to allow delivery of further homes from 207/28 onwards, however we maintain our position that the programming is too ambitious from 2029/30 onwards and that combined completions are likely to be around 120 per annum based on similar sites. I attach HFS's Housing Land Audits: Homes for Scotland Procedures paper for information. Should combined programming exceed 120 homes per annum HFS will dispute the Heartlands programming'.

Council's Position: The representatives for Heartlands has provided a detailed response with programming to inform HLA'25.

The HLA Guidance states that programming should be realistic, robust, and evidence-based, taking into account stakeholder input, delivery trends, and site-specific circumstances. It also notes that general assumptions should only be used where detailed programming is not available.

In this case, a detailed programme has been prepared collaboratively. It has been assessed and is comparable to past completion rates at Heartlands and delivery rates on comparable large strategic sites in West Lothian.

As such, the landowner-led programming represents a more reliable and evidence-based assessment of delivery than the generalised assumptions applied by HFS. The Council therefore considers that the landowner submitted programming should be used for HLA purposes.

HLA Ref: 318 – 352, Bangour Hospital, Dechmont

HFS Dispute: Whilst it is recognised that the terms of the S75 provide an initial incentive to deliver homes earlier to fund the Non-Denominational School Education Contribution and

reduce the associated Bond the following trigger points within the S75 relate to the number of completions and these will be influenced by market conditions. At this point in time, we are of the view that Bangour Village is overprogrammed and unlikely to have nine phases on-site in the next 4-5 years. It is recommended that the phasing is reduced to accord with HFSs Housing Land Audits: Homes for Scotland Procedures paper where there are 120 combined completions per annum (3-4 sites). Should combined programming exceed 120 homes per annum HFS will dispute the Bangour Hospital programming.

Council Position: Whilst the developer did not respond to this Housing Land Audit, a meeting was held with the developer and their representative last year and information received which included programming details. The programming is comparable to delivery rates on other large sites in West Lothian and reflect the large variety of products on offer (conversion, new build, flats and houses). The council considers the landowner-led programming and phases represents a more reliable and evidence-based assessment of delivery than the generalised assumptions applied by HFS.

Completions

The HLA provides information on past completions. For the period 1st April 2023 – 31st March 2025 there were **864** completions.

For the purposes of HLA, a completion is defined as a house or flat which is built and is capable of being occupied.

The main source of data collection for the calculation of completions is completion certificates issued by Building Standards. Temporary completions certificates are accepted as an indication of a completion for the purpose of the HLA. Completion certificates for homes that already had a temporary certificate are not included to avoid double counting.

There are some instances that a completion certificate does not exist for occupied homes, in such instances a cross referencing with the Scottish Assessors takes place. If the property exists for the purposes of council tax, then that property will also be included in the definition of completion for the purpose of the HLA.

Table 1: Past Completions

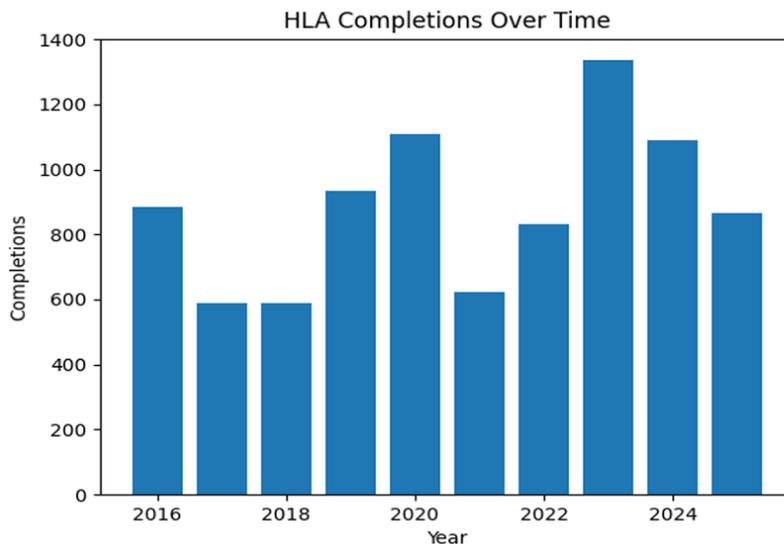
HLA	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
	884	587	590	934	1107	621	832	1335	1088	864

10 Year Total	8,842
10 Year Average	884
5 Year Total	4,740

5 Year Average	948
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Figure 1: Past Completion Rates as defined by Housing Land Audits.

HLA Completions Over Time



185 of the **864** completions were built on brownfield land, this equates to 21%.

160 of the **864** completions were derived from windfall, this equates to 19%

8 of the **864** completions were built on small sites (3 or less units).

314 of the completions were affordable housing, this equates to 36%.

HLA 2024 estimated **1,152** completions in 2024/25. The delivery of sites is therefore not happening earlier than previously identified.

Remaining Established Land Supply

The remaining deliverable and deliverable with constraints housing land supply is **14,758**. Of which **12,862** are programmed over a 10-year period.

The remaining deliverable and deliverable with constraints affordable housing land supply is **3,108**. Of which **2,814** are programmed over a 10-year period.

NPF4 sets a Minimum All-Tenure Housing Land Requirement (MATHLR) for each planning authority in Scotland. 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 in Scotland for a 10-year period. The MATHLR for West Lothian is **9,850**.

At present there is sufficient deliverable and deliverable with constraints land supply to meet the housing land target set out by NPF4.

Figure 2: Composition of deliverable and deliverable with constraints housing land supply over time

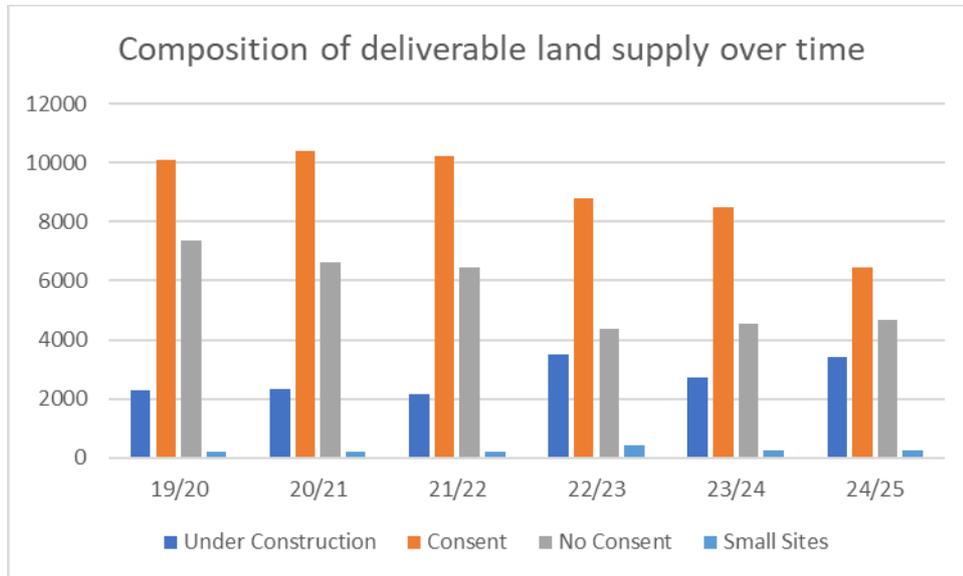
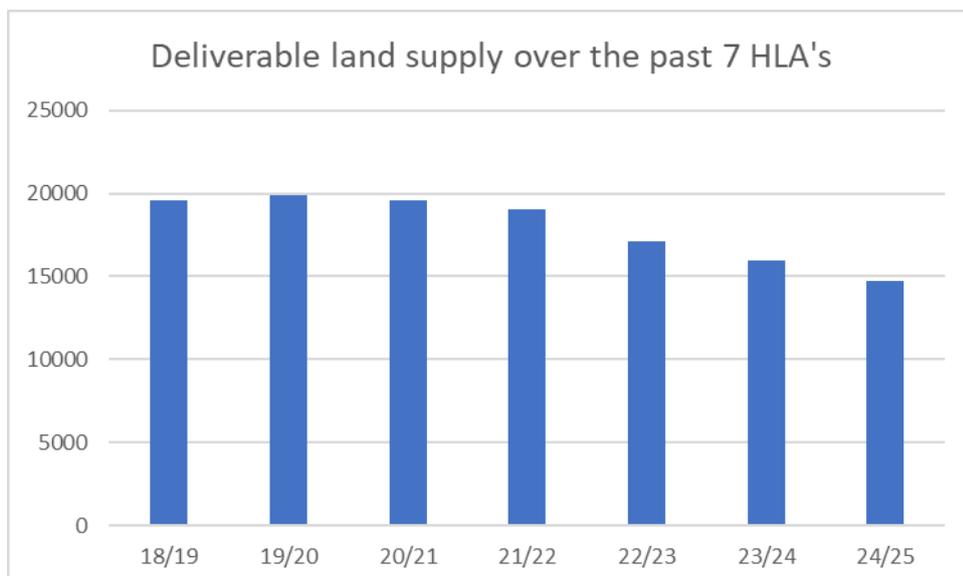


Figure 3: Total effective land supply over the past seven Housing Land Audits.



The total deliverable / deliverable with constraints land supply remained steady for a number of years with windfall sites and sites previously categorised as non-effective contributing to the effective supply and replacing the supply that has been converted to completions.

The supply is steadily reducing as it converts to completions.

Figure 4: Deliverable and deliverable with constraints housing land pipeline.

