

National Planning Framework 4

Minimum All-Tenure Housing Land Requirement

RESPONSE TEMPLATE

Loch Lomond & Trossachs National Park Authority

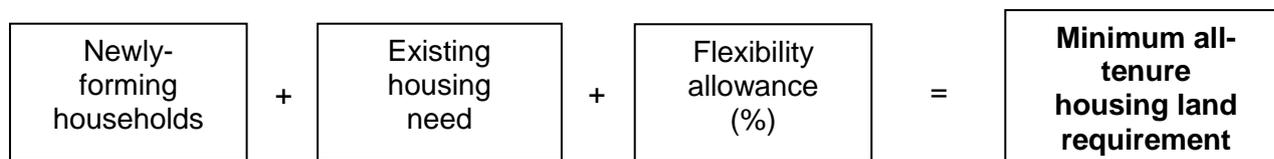
Scottish Government

Planning & Architecture Division and Housing & Social Justice

February 2021

PURPOSE

The Scottish Government has produced initial default estimates of the 10 year minimum all-tenure housing land requirement for each local authority and national park authority. These are derived from three main inputs:



The initial default estimates are set out in the Guidance and Method Paper that accompany this Response Template. They are a first step towards developing a Scotland-wide picture of the amount of land for housing that will be needed in the future to guide allocations in Local Development Plans (LDPs). They are a starting point for authorities to consider and input to in order to inform the final figures that will feature in the draft NPF4.

Authorities are being asked to consider the default assumptions for household projections and existing housing need, flexibility allowance and estimates and to make a case for adjusting them where there is clear and robust evidence and policy requirements do to so. The Guidance indicates how authorities should go about making the case for change and this template must be used to respond. The two should therefore be used in tandem. Please note that word limits set out in the template must be observed as closely as possible.

An Excel Calculator is also provided. It shows the default calculations and allows authorities to input adjusted data in three simple steps to produce locally adjusted estimates. If making a case for change, authorities must use the calculator and submit this alongside the template.

Prior to submitting the template to the Scottish Government for formal assessment, authorities are encouraged to discuss this with Scottish Government housing and planning officials and to seek any advice as they build a case. Requests of this nature should be sent to the following mailbox (NPF4housingland@gov.scot) in the first instance.

On completion, the response template and calculator should be submitted to the mailbox for assessment by Scottish Government housing and planning officials. The appraisal criteria that will be used are set out in the accompanying Guidance. A short Assessment Report will be written-up and this will contain the Scottish Government's decision.

STEPS TO TAKE

- Step 1** Read the Guidance and Method Paper accompanying this template.
- Step 2** Work with your Housing Market Partnership (HMP) and local stakeholders to consider and discuss the initial default estimates of the minimum all-tenure housing land requirement.
- Step 3** Use this response template to make a case for any adjustments you wish to make to the initial default estimates. Note that the response template should be no longer than **12 pages** (excluding the cover sheets) and this will be observed by SG when assessing the templates.
- Step 4** Discuss the template with SG housing and planning officials if that is useful.
- Step 5** The response template should be signed-off by the Head of Housing and the Head of Planning or the equivalent senior official from each department.
- Step 6** Submit the completed response template to the SG for consideration using the mailbox (NPF4housingland@gov.scot).

TEMPLATE PART 1 – Household Projections (Newly-Forming Households)

Instructions

The Scottish Government's initial default estimates use the NRS 2018-based principal household projections (equivalent to step 1 of the HNDA Tool). Alternative household projections are available including the NRS low migration variant and high migration variant. Some authorities also produce household projections in-house and authorities can consider the use of these where they can make a robust case for this.

Use the space below to provide evidence for the use of an alternative household projection. This must explain how the housing completions data provided by the Scottish Government has been considered. It must also include the actual household projections that you wish to use. Where necessary, tables of figures can be provided in an Annex.

Loch Lomond & Trossachs National Park Authority Response:

We do not seek to alter the principal household projections. We have trialled some scenarios using the excel calculator however given the low numbers involved, and the rounding mechanism built into the tool, this has not been very effective and the different scenarios does not alter the overall numbers. We are not in a position at this time to offer an alternative.

Our Housing and Population Background Paper (May 2017) sets out our more recent policy position which was to set an ambitious target in order to reverse projected population decline, readdress the balance of a declining working age, provide specialist and smaller homes for the ageing population and those in need, and address the backlog created by the lack of development activity in the years pre-dating the plan (pre 2001).

Our current housing supply target is 75 per annum to address these issues but we do not consider this to be sustainable in the longer term given our protected area status. This 'ambitious' target was identified through the LDP preparation and examination process, taking into account the HNDA and LHS targets. No actual housing land requirement was placed upon the National Park by the local housing authorities so our target of 75 homes per year has always been an aspirational 'target' as opposed to a specific set requirement and was designed specifically as a policy response to help retain and attract younger and working age households to the Park.

Our completion figures show that we have not yet achieved 75 completions per annum in the past 10 years with an average of 25 homes per year completed. However, recent years have shown a spike in completions with 2019 seeing 63 homes completed due to the increase in affordable housing funding which the area relies on given there are no large house builders operating. We have also recently had approvals for self-build plots and community owned workers accommodation. We expect that we can maintain a higher completion level for the next couple of years given the commitments in place from Strategic Housing Investment Plans, but

not in the longer term as this high target will have achieved its aim to address the backlog and increase the affordable housing provision. This has also been achieved via relatively large scale land release at two main settlements in the Park (Callander South expansion and Drymen east) with options for similar levels of land release considered unlikely on a range of factors including environmental, community impact and infrastructure capacity.

This is the reason we propose the use of the principal migration levels to set a realistic minimum figure for the longer term and to allow us to gather more robust evidence which we will be doing in 2022 in order to prepare our next plan. We would prefer to retain the option to increase the target where local circumstances dictate and if needed as a policy response to socio-economic factors, such as simulating rural re-population in some of the more remote rural areas of the National Park.

TEMPLATE PART 2 – Existing Housing Need

Instructions

The Scottish Government's initial default estimates include an estimate of existing housing need (equivalent to step 2 of the HNDA Tool). This includes homeless households in temporary accommodation and households who are *both* overcrowded *and* concealed.

Use the space below to provide robust evidence for the use an alternative existing housing need figure. This must explain how the housing completions data provided by the Scottish Government have been considered. This must also include the existing housing need figure that you wish to use. Where necessary tables of figures can be provided in an Annex.

Loch Lomond & Trossachs National Park Authority Response:

We rely on analysis of the Housing Need and Demand Assessments for both Stirling and Argyll and Bute Council areas of the Park which have the larger area of the Park. And also refer to Glasgow and Clyde Valley HNDA and our own local housing need surveys and council and RSL waiting lists. Community Action and Local Place Plans are also indicators of locally arising need and/or where there is a need to support increase in population in rural areas.

We note that the methodology unlike other local authority figures that the National Park figures are based the number of occupied households in the National Park and each local authority is derived for 2018. A proportion is then applied to each local authority area. It is noted that Perth and Kinross data zone (for Comrie and St Fillans) involved are mainly on the council side of the Park border and are included in the council figures.

We are content with this methodology as it is consistent with the method previously agreed in the most recent version of the HNDA tool and even though we have not applied such a methodology (as we have not updated our LDP).

The existing housing need as shown in Annex B, shows:

Argyll and Bute HMA	5
Stirling HMA	32
West Dunbartonshire HMA	11

From analysis of the Stirling HNDA 2019 there is a predicted housing need of 472 for all of Stirling Council using own estimate and 336 from the tool default. Annex B as published shows a figure of 309.

We have also received recent figures produced by Argyll and Bute Council for their next HNDA to be published later in 2021, show the predicted housing need for the council area (not the National Park) of 800 due to a backlog, concealed households, poor quality housing, specialist home requirements rather than the 148 as shown in Annex B.

It is therefore expected that that existing housing need as a percentage of the Park would carry through and increase the figure above for Argyll and Bute from 5 to around 24 (using 3% as the proportion) and for Stirling from 32 to around 52 (using 11% as the proportion). We have not adjusted West Dunbartonshire HMA area as the HNDA for this area was published in 2015 and we do not have up-to-date information to propose an alternative at this time.

In conclusion, we are content with the methodology used to extract the Existing Housing Need for the National Park Area but we feel this figure should be increased based on the up-to-date local evidence from Stirling and Argyll and Bute. We estimate that existing housing need total would be 87 (Argyll and Bute 24, Stirling 52 and West Dunbartonshire remaining 11), rounding this up to 100.

The tables below summarise existing and proposed figures for the National Park

Table 1 – NPF4 Initial Default Estimate

Existing Housing need* –	Newly Forming Households	Flexibility allowance – 30%	Minimum Housing Land Requirement	Past Housing Completions
50	150	50	250	Not provided by SG

* comprised homeless households in temp accommodation and householders that are overcrowded and concealed.

Table 2 – NPF4 locally adjusted housing need

Existing Housing need* –	Newly Forming Households	Flexibility allowance – 30%	Minimum Housing Land Requirement	Past Housing Completions
100	150	50	300	Not provided by SG

* adjusted to reflect HNDA for Argyll and Stirling.

TEMPLATE PART 3 – Flexibility Allowance

Instructions

The Scottish Government's initial default estimates include the addition of a 25 per cent flexibility allowance for urban areas and 30 per cent for rural areas. This is to provide a contingency or over programming of land to allow for changes in sites coming forward over the 10 year time frame of the local development plan.

Use the space below to provide evidence for the use of an alternative flexibility allowance, which should generally be no less than those provided. This must explain how the housing completions data provided by the Scottish Government has been considered. It must also include the percentage flexibility allowance that you wish to use.

RESPONSE

It states that the Randal Classification of Urban/Rural has been used and even though it does not cover National Parks, it is considered appropriate to include them within the rural category. The flexibility allowance is similar to the generosity in current SPP in that it reflects the aim of ensuring LDPS allocate a generous supply of land for housing. These percentages are higher than the current SPP (10-20%) to account for 10 year plans as opposed to 5 year plans. Higher percentage for rural is due to aim of increasing the population of rural areas of Scotland.

Currently our Local Development Plan 2017-2021 does not add on the recommended 10-20% in the SPP and this was accepted by the reporter (see the Issue 19, page 151 of the Proposed Plan [examination report](#)) as we had already set ourselves such an ambitious housing supply target of 75 homes per year. Whilst this was informed by HNDA's for the area, it was primarily driven by a local policy response rather than data driven assessment and estimate.

To continue this ambitious target of 75 new homes per annum will be extremely challenging and will require to be considered through the next LDP. We will continue to find it difficult to allocate sites for development given the constraints in the park and it is likely that windfall from redevelopment / re use of existing buildings will remain an important element of delivery of new homes.

Given that the default and proposed locally adjusted figures are lower than the current LDP ambitious requirement we are comfortable with the proposed 30%. As the default minimum flexibility allowance and support the statement that authorities can adjust this default to a higher figure if required to reflect the local circumstances and allow a more generous flexibility if required. We do not think that the default figure is set too high.

However, **in principle** the land in the Loch Lomond and Trossachs National Park is a European or National importance for nature conservation and this limits the amount of land that is appropriate for development. Taking account of the National Park aims it is our position that there local circumstances merit a lower percentage, similar to what has been applied in Cairngorms recent Local Development Plan. The

same arguments apply and we propose that a margin of 10% is applied across our area. We would then seek to use the LDP process to consider increasing the target as required to reflect local and regional circumstances. This is shown in Table 3 below which evidences, that due to the low figures involved and rounding, this has no impact on the eventual Minimum Housing Land Requirement.

Table 3 – NPF4 locally adjusted housing need with flexibility reduced from 30% to 10%

Existing Housing need* –	Newly Forming Households	Flexibility allowance – 10%	Minimum Housing Land Requirement	Past Housing Completions
100	150	0	250	Not provided by SG

* adjusted to reflect HNDA for Argyll and Stirling. .

TEMPLATE PART 4 – Locally Adjusted Estimate of Minimum All Tenure Housing Land Requirement

Instructions

The Excel Calculator must be used to produce a locally adjusted estimate of the minimum all-tenure housing land requirement. The initial default and adjusted estimates must be provided below.

Initial Default Estimate = 250

Adjusted Estimate = 250

A copy of the adjusted Excel Calculator must be submitted with the response template.

We have enclosed a copy of the excel calculator as adjusted. As described above, we are increasing the existing need but proposing the flexibility is reduced to 10%. As explained due to the low figures involved and rounding, this has no impact on the eventual Minimum Housing Land Requirement as one figure is adjusted up by 50 and one is adjusted down by 50.

TEMPLATE PART 5 – Housing Market Partnership (HMP) and Stakeholder Involvement

Instructions

Use the space provided below to list the HMP membership, provide a summary of their views and an indication of whether the HMP has agreed the locally adjusted estimate of the minimum all-tenure housing land requirement. Also provide a list of additional stakeholders and a summary of their views. Use the sub-headings provided.

List of HMP members

N/A – As a National Park Authority, we do not have our own Housing Market Partnership.

Summary of HMP views

n/a

HMP agreement

Has the HMP agreed your minimum housing land figure? *Please delete accordingly*

N/A

If not, please explain any disputes

List of Additional Stakeholders

*We have liaised closely with Stirling Council and Argyll and Bute Council in relation to the response to gather information on Housing Need and Demand.
We have also liaised with Cairngorms National Park Authority regarding methodology relating to National parks in Scotland.*

Summary of Stakeholders Views

TEMPLATE PART 6 – Joint Housing and Planning Senior Official Sign-Off

Instructions

This template should be agreed and signed-off, jointly, by the Head of Housing and the Head of Planning or the equivalent senior official from each department. Typed signatures can be provided.

Head of Housing

Full Name: *N/a as we are a National Park Authority and do not have a housing team.*

Full Title:

Email:

Date:

Signature:

Head of Planning

Full Name: *Stuart Mearns*

Full Title: *Director of Place*

Email: stuart.mearns@lochlomond-trossachs.org

Date:

Signature: