

National Planning Framework 4

Glasgow City Region (covering East Dunbartonshire, East Renfrewshire, Glasgow City, Inverclyde, North Lanarkshire, Renfrewshire, South Lanarkshire and West Dunbartonshire)

Minimum All-Tenure Housing Land Requirement

ASSESSMENT REPORT

Scottish Government

Planning & Architecture Division and Housing & Social Justice

September 2021

CORE OUTPUTS ASSESSMENT

1 Locally Adjusted Estimate

Authorities within the Glasgow City Region (GCR) have worked collaboratively to provide their locally adjusted estimates: this comprises: East Dunbartonshire, East Renfrewshire, Glasgow City, Inverclyde, North Lanarkshire, Renfrewshire, South Lanarkshire and West Dunbartonshire.

In their initial response, the GCR provide context to their housing and place making ambitions. They set out concerns with the new approach and note that work on the Housing Need and Demand Assessment (HNDA) 3 has not been concluded. They do state however, that they provide an indicative and conditional officer view to enable Scottish Government to progress with preparation of NPF4.

The GCR indicate they will provide a view on the household projections, existing need and therefore housing estimates, following conclusion of its HNDA and market area adjustments, which will be undertaken as soon as practicable to inform preparation of NPF4. On publication of draft NPF4 a politically endorsed consultation response will be provided with a firmer view of the housing estimates and MATHLR.

A supplementary submission has been provided and notes that it in part fulfils the earlier intention to provide an updated view of estimates and mobile demand. It indicates the current target of the approved Strategic Development Plan is to deliver 6,000 new homes each year to 2029 but that securing delivery at the rate required remains challenging. It confirms that some elements of the HNDA(3) have now been progressed to draft stage and an approach to apportioning mobile demand has been developed.

The Scottish Government asked if it would be possible to use inputs from the draft HNDA3, at this stage, to inform the MATHLR but the councils do not feel they are in a position to do this.

The supplementary submission revises the adjusted estimate as follows:

	Initial Default Estimate	Locally Adjusted Estimate	Revised Adjusted Estimate
East Dunbartonshire	3,200	2,550	2,500
East Renfrewshire	4,050	2,300	2,800
Glasgow City	21,450	21,450	21,350
Inverclyde	250	1,500	1500
North Lanarkshire	6,300	9,000	7,350

	Renfrewshire	4,900	4,900	4,900
	South Lanarkshire	7,800	7,800	7,850
	West Dunbartonshire	450	2,100	2,100
	Glasgow City Region	48,400	51,600	50,350
	<p>The initial response makes comparison of the initial default estimate and Housing Land Audit completions, noting past completions are higher at the city region scale than the estimates. It indicates that the HLA information is considered to be more appropriate.</p> <p>In the last 20 years, delivery has averaged at around 6,800 units per year and in the last 10 years it has been around 5,400 per annum. Completions were at the initial default estimate level of below 5,000 during the years impacted by the global financial recession from 2010 to 2015, but since then private delivery has recovered boosting completions.</p>			
2	<p>Household Projections (Newly-Forming Households)</p> <p>In their initial response, the GCR indicate they will provide a view on the choice of household projections following conclusion of its HNDA and in the meantime offer comments.</p> <p>They comment that within the GCR, both the land and ambition exists to accommodate higher levels of growth than projected in the NRS 2018 principal variant. Reference is made to an estimated total land supply of almost 105,000 units in 2019. They indicate the initial default estimate, at 48,400, falls short of the GCR's ambitions in relation to housing delivery and placemaking over the 10 year period but that there is a requirement at this stage to take a precautionary approach due to potential changes in the future NPF. They note that the MATHLR exercise has simplified the process and wish to conclude the HNDA before providing a finalised response once draft NPF4 is published for consultation.</p> <p>In their supplementary submission, the GCR indicate that they have used the NRS 2018 based principal variant to develop draft housing estimates but maintain that an updated view will be provided following publication of draft NPF4.</p>			
3	<p>Existing Housing Need</p> <p>In their initial response, the GCR indicate they will provide a view on the scale of existing housing need following conclusion of its HNDA and in the meantime offer comments.</p> <p>They comment that the initial estimates under-estimate total existing housing need for the region by approximately 1,900 households. They note that the MATHLR exercise has simplified the process and wish to conclude the HNDA</p>			

	<p>before providing a finalised response once draft NPF4 is published for consultation.</p> <p>In their supplementary submission, the GCR note the use of the default housing need estimates at this stage, indicating it will be reviewed as the HNDA progresses. They maintain that an updated view will be provided following publication of draft NPF4. They also highlight that additional evidence has been brought to their attention, in the form of a draft report on existing housing need in the GCR area based on survey work, and that they are currently considering this work.</p>
<p>4</p>	<p>Flexibility Allowance</p> <p>In their initial response, the GCR has concerns about the blanket adoption of flexibility at 25% in that they consider it could lead to adverse impacts potentially contrary to the stated aims of NPF4, the purpose of planning and national outcomes around climate change and biodiversity. They note that within the GCR there is a long standing approach to the redistribution of mobile private demand between local authorities based on a Housing Market Area Framework and conclude that some areas should have figures higher than the defaults to encourage and accommodate the higher levels of housebuilding anticipated, and some lower in areas of strong commercial demand with environmental and infrastructure constraints where restraint is required.</p> <p>Whilst the initial response proposes East Dunbartonshire and East Renfrewshire not include any flexibility, in the subsequent submission 25% is applied across all constituent authorities. There are however, adjustments made to account for mobile demand in the private sector element across the GCR. This is based on past patterns of moves using housing sales data for the 5 year period of 2013 to 2017. It covers moves from outwith the GCR and inter-authority moves and has been apportioned based on the total available land supply.</p>

<p>CORE PROCESSES ASSESSMENT</p>	
<p>1</p>	<p>Using the Response Template and Excel Calculator</p> <p>The Glasgow City Region Housing Market Partnership has submitted an alternative Response Template which covers all the eight councils in the region. As this covers all eight councils the word limits are not exceeded. The Excel Calculator has not been returned but some outputs from this are reported in the alternative Response Template.</p>

<p>2</p>	<p>Housing Market Partnership and Stakeholders Involvement</p> <p>The HMP is made up of housing and planning officers across constituent councils and officers of Clydeplan. This submission is made by the HMP.</p> <p>The HMP agreed the indicative and conditional locally adjusted estimates as set out in their supplementary submission.</p> <p>HfS and four members of their Strathclyde Home Builders Committee were engaged. Discussions remain on-going.</p>
<p>3</p>	<p>Joint Housing and Planning Senior Official Sign-Off</p> <p>The submissions have been signed-off by housing and planning lead officers from all constituent councils.</p>
<p>4</p>	<p>Statistical Evidence</p> <p>The councils have used robust sources of statistical evidence to support their provisional case including:</p> <ul style="list-style-type: none"> • NRS2018-based household projections (principal) • SG estimates of existing housing need <p>Some councils have used in-house sources including:</p> <ul style="list-style-type: none"> • HLA completions data. <p>Reasons are given for the use of their HLA completions data over the Scottish Government default figures.</p> <p>Other data used includes house sales data.</p>
<p>5</p>	<p>Policy Evidence</p> <p>The initial submission by the GCR highlights the significance of the region to the Scottish economy and notes that the city region operates as a single functional housing market area. It confirms that it has significant ambitions in relation to housing and placemaking.</p> <p>The following policy drivers are highlighted:</p> <ul style="list-style-type: none"> • National Policy Drivers and Evidence <ul style="list-style-type: none"> ○ NPF4 Position Statement ○ Housing to 2040 ○ Infrastructure Investment Plan for Scotland 2021-22 to 2025-26

- Strategic Transport Projects Review (SPTP)2 National Case for Change Report
- A Scotland for the future: opportunities and challenges of Scotland's changing population
- Scottish Vacant and Derelict Land Survey 2019
- National Planning Performance Frameworks
- **Regional policy drivers and evidence**
 - Glasgow and the Clyde Valley Strategic Development Plan and Indicative Regional Spatial Strategy
 - Housing Market Area (HMA) Framework
 - Glasgow City Region - Regional Economic Strategy
 - Glasgow City Region City Deal Infrastructure Programme, with a package of £1.13 billion of interventions
 - Creation of bespoke delivery models, including Clyde Gateway and Clyde Mission
 - Glasgow City Centre Living Strategy 2035
 - Glasgow Metro STP2 Update and Phase 1 Recommendations
 - Glasgow City Region's Economic Recovery Plan, Recover Rebuild Renew
 - Climate Ready Clyde Adaptation Strategy

MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)

For the reasons specified above the proposed MATHLR is:

	MATHLR
East Dunbartonshire	2,500
East Renfrewshire	2,800
Glasgow City	21,350
Inverclyde	1,500
North Lanarkshire	7,350
Renfrewshire	4,900
South Lanarkshire	7,850
West Dunbartonshire	2,100
Glasgow City Region	50,350