

National Planning Framework 4

Loch Lomond & Trossachs National Park

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

	Initial Default Estimate	Locally Adjusted Estimate
LL&TNP	250	300

Loch Lomond and Trossachs National Park Authority (LL&T NPA) indicated that they trialled some scenarios however, due to the small figures involved adjustments to need, household projection and flexibility have not made a significant difference to the estimate; particularly if rounding to the nearest 50 is adopted.

The locally adjusted estimate benchmarks appropriately to 10 year completions of 250 units (council in-house data). The authority note there has been spikes 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.

2 Household Projections (Newly-Forming Households)

The National Records of Scotland (NRS) 2018-based principal migration variant is used. LL&T NPA do not wish to increase this because they have only been achieving an average of 25 completions a year and 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 stimulating rural re-population in some of the more remote rural areas of the National Park.

Housing Projection: Default Compared to Adjusted Estimate

	Default	Adjusted
LL&TNP	150	150

3 Existing Housing Need

Existing Housing Need: Default Compared to Adjusted Estimate

	Default	Adjusted
LL&TNP	50	100

LL&TNPA response to increase their existing housing need figure is based on more recent Housing Need and Demand Assessment's (HNDA) for Stirling and Argyll & Bute. They also refer to Glasgow and Clyde Valley HNDA, the parks own local housing need surveys and Council and Registered Social Landlords (RSL) waiting lists.

	<p>The authority note the different methodology used for national parks and confirm they are content with this as it is consistent with the method previously agreed in the most recent version of the HNDA Tool.</p>
<p>4</p>	<p>Flexibility Allowance</p> <p>Given that the default and proposed locally adjusted estimates are lower than the current LDP ambitious requirement LL&T NPA are comfortable with the proposed 30%. However, the authority make the case for a reduction to a 10% flexibility to be applied due to the nature conservation designations that limit the amount of land that is appropriate for development.</p> <p>The authority also highlight that due to the low figures involved and rounding, changing from 30% to 10% flexibility has no impact on the eventual adjusted estimate. The reduction to 10% flexibility has no impact on the adjusted estimate as both would round to 250 units. Retention of 30% generates an estimate of 321 units (rounding to 300).</p> <p>The Scottish Government have applied a flexibility percentage to all authorities to represent a contingency of land and allow for changes in sites coming forward over the plan period. It has been consistently applied across all planning authority areas through use of the Randall Classification, which is based upon population density within a unitary authority. The rural classification and application of 30% is applied where a unitary authority has a population density of less than one person per hectare.</p>

<p style="text-align: center;">CORE PROCESSES ASSESSMENT</p>	
<p>1</p>	<p>Using the Response Template and Excel Calculator</p> <p>LL&T NPA has completed the Response Template and, in the main, this has been completed correctly. In the stakeholder section they list that they have worked with Argyll and Bute Council, Stirling Council and Cairngorms National Park Authority. The word limit has not been exceeded and the Excel Calculator has been submitted.</p>
<p>2</p>	<p>Housing Market Partnership (HMP) and Stakeholders Involvement</p> <p>There is no HMP for LL&TNP. Consultations were undertaken with Stirling and Argyll & Bute Councils.</p>
<p>3</p>	<p>Joint Housing and Planning Senior Official Sign-Off</p> <p>Sign-off from the Director of Place made.</p>

4	<p>Statistical Evidence</p> <p>LL&TNPA has used robust sources of data to support their case including:</p> <ul style="list-style-type: none"> • NRS 2018-based principal household projection • Argyll and Bute HNDA (2021) • Stirling HNDA (2019) <p>The use of this statistical evidence has been explained clearly.</p>
5	<p>Policy Evidence</p> <p>The Housing and Population Background Paper (May 2017) for the Local Development Plan sets out the policy position with an ambitious, advisory and medium-term target of 75 units per year in order to reverse projected population decline, restore the balance of a declining working age, provide specialist and smaller homes for the ageing population and those in need, and address the backlog.</p> <p>The authority indicate that the 75 per annum target was ambitious and aspirational, rather than being a specific set requirement. They note it was designed specifically as a policy response to help retain and attract younger and working age households to the park. The authority do not consider the 75 per annum to be sustainable in the longer term given the protected area status.</p>

MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)	
For the reasons specified above the proposed MATHLR is:	
LL&TNP	MATHLR 300