

National Planning Framework 4

Stirling

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
Stirling	3,500	3,500

No adjustment to the initial default estimate was proposed.

The estimate is benchmarked to the 10 year Scottish Government completions (2,878 units) ([Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot \(www.gov.scot\)](#)), 2,614 units – Housing Land Audit) . The annualised estimate of 350 units has only been exceeded once in the past 10 years – in 2015/16 with 368 HLA completions. The Council considers that the initial default estimate is reasonable and achievable as the general decline in annual completions since the 10 year ‘peak’ in 2015/16 will be reversed in future years with the expected delivery of strategic housing sites.

2 Household Projections (Newly-Forming Households)

The National Records of Scotland (NRS) 2018-based principal household projection is used by the authority. They note this is consistent with their approved Housing Need and Demand Assessment (HNDA) that used the NRS 2016-based principal household projection and best represented the baseline scenario and local fit for the Stirling area. The Council notes that they have not produced in-house projections and as such, does not possess the type of robust evidence that is needed to adjust the demand input.

Household Projection: Default Compared to Adjusted Estimate

	Default	Adjusted
Stirling	2,400	2,400

3 Existing Housing Need

Existing Housing Need: Default Compared to Adjusted Estimate

	Default	Adjusted
Stirling	300	300

The Council is not in a position to present an alternative existing housing need estimate at this time. They note that the number of homeless applications would provide a more accurate measure of existing housing need, consistent with the approach taken in the HNDA. The authority finds the default figure to be an appropriate measure of additional housing units required to meet existing housing need in the Stirling area.

4	<p>Flexibility Allowance</p> <p>Stirling Council requests that it is reclassified to an 'urban' authority, but is nevertheless content with the rural flexibility allowance of 30%.</p> <p>The Council notes that the Randal Classification which is set at a local authority level does not account for the dynamic and complex nature of housing market areas which often transcend local authority boundaries. The Council state that its HNSA data shows that 71% of the purchasers in the council area were from urban areas, of which 20% originated from outwith the authority area.</p> <p>The Council indicate that net migration averaged 670 between 2014/15 and 2018/19 and therefore is no evidence it is experiencing rural depopulation. It also refers to the accessibility of the area and as a result experiences significant housing pressure. The pandemic and shifts in living and working is also a factor.</p> <p>A change from 30% flexibility to 25% flexibility would result in a land requirement of 175 fewer units.</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. It is for the authority to determine the appropriate location of the land that would accommodate that accrued through the flexibility allowance but the Scottish Government consider it should remain at 30% for Stirling to ensure a consistent approach across the country.</p>
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CORE PROCESSES ASSESSMENT	
1	<p>Using the Response Template and Excel Calculator</p> <p>The Council has used the Response Template and, in the main, this is completed correctly. Under stakeholder sections HfS were the only member of the HMP to engage. A copy of the Excel calculator has been submitted.</p>
2	<p>Housing Market Partnership and Stakeholders Involvement</p> <p>The only HMP member to engage was Homes for Scotland. The estimate was not agreed. Homes for Scotland expressed concerns with the methodology for</p>

	calculating the estimate relating to household projection, need and the disconnection between the process (and the figures that it has produced) and Scottish Government policy. The Council provided their response to each of HfS concerns.
3	Joint Housing and Planning Senior Official Sign-Off Appropriately signed-off by lead housing and planning officers.
4	Statistical Evidence The Council has used robust data source including: <ul style="list-style-type: none"> • NRS 2018-based principle household projections • Scottish Government existing housing need estimates
5	Policy Evidence As no adjustment to the initial default estimate is proposed, the Council has not considered the influence of policy drivers such as: <ul style="list-style-type: none"> • The Growth Deal • Housing to 2040 <p>There is passing reference to increasing completions in future years with the expected delivery of strategic housing sites.</p>

MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)

For the reasons specified above, the proposed MATHLR is:

	MATHLR
Stirling	3,500