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**By email:**

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Our ref: A31243770

18 December 2020

Dear Mr McGuinness

**Town and Country Planning (Scotland) Act 1997  
Notice of Intention to Adopt – West Dunbartonshire Local Development Plan 2**

I refer to your correspondence of 26 August 2020 certifying notice of West Dunbartonshire Council's intention to adopt the West Dunbartonshire Local Development Plan 2 (LDP).

Scottish Ministers have decided that the proposed plan as notified is unsatisfactory and hereby direct under section 20(5) of the Town and Country Planning (Scotland) Act 1997, that West Dunbartonshire Council consider modifying the proposed West Dunbartonshire Local Development Plan 2 as indicated in the Annex to this direction.

This direction is considered necessary to:

1. provide clarity that it is the Strategic Development Plan (in this case Clydeplan) which sets the Housing Land Requirement (HLR) for the West Dunbartonshire area and that by reference to the Court of Session opinion on Inverclyde Local Development Plan (2019), the HLR cannot be adjusted in the manner to which it is set out in the proposed LDP;
2. address references to the associated findings, in relation to point 1 above, regarding housing land supply.

Section 20(6) provides (subject to any further direction under section 20) that your authority may not adopt the West Dunbartonshire Local Development Plan 2 unless you satisfy Scottish Ministers that you have made the modifications necessary to conform with this direction, or the Scottish Ministers withdraw it.

West Dunbartonshire Council have notified their intention to adopt Local Development Plan 2 to Scottish Ministers after a significant period of preparation and having determined not to adopt the Local Development Plan 1 in 2015. With this in mind, Scottish Ministers' decision to issue a direction regarding the housing section of this current local development plan has required careful consideration and has not been made lightly. However, in this case



Ministers have been left with little option but to intervene, which has been necessary to address the deficiencies of the plan in relation to the Inverclyde LDP Court of Session judgement (22 July 2020).

It is hoped that, following this intervention by Scottish Ministers, West Dunbartonshire Council will take the opportunity to progress and adopt the plan, with the necessary modifications, ensuring that an adopted local development plan is in place to inform land use decision making within the Council area.

I would be grateful if you would therefore confirm that your authority will modify the plan as directed.

Yours sincerely



**Helen Wood**  
**Assistant Chief Planner**

## Annex

### Page 5

Remove the following text:

'Table 1 Housing Land Requirements (2012-24)'

'Table 2 Housing Land Requirements 2024-30'

### Pages 80 and 81

Remove the section highlighted below under the heading 'Meeting Housing Land Requirements':

'The Glasgow and the Clyde Valley Housing Need and Demand Assessment was prepared for Clydeplan and subsequently confirmed as robust and credible by the Scottish Government in May 2015. It sets out the evidence base for the Housing Supply Targets and the Housing Land Requirement for the period up to 2029 for both private and social rented housing. For the purposes of this plan, these figures have been extrapolated to 2030.

<b>Table 1 Housing Land Requirement 2012-2024</b>			
	<b>Private</b>	<b>Social Rented</b>	<b>All Tenure</b>
<b>A Housing Supply Target (2012 – 2024)</b>	<b>1,800</b>	<b>960</b>	<b>2,760</b>
<b>B Housing Land Requirement (2012 – 2024)</b>	<b>2,070</b>	<b>1,100</b>	<b>3,170</b>
<b>C Completions from 2012 – 2019</b>	<b>885</b>	<b>278</b>	<b>1,163</b>
<b>D Housing Supply Target 2019 – 2024 (A – C)</b>	<b>915</b>	<b>682</b>	<b>1,597</b>
<b>E Housing Land Requirement 2019 – 2024 (D + 15%)</b>	<b>1,052</b>	<b>785</b>	<b>1,837</b>
<b>F Supply 2019 - 2024</b>	<b>1,137</b>	<b>934</b>	<b>2,071</b>
<b>G SURPLUS 2017 – 2024 (F-E)</b>	<b>85</b>	<b>149</b>	<b>234</b>

Table 1 above sets out the Housing Supply Target for West Dunbartonshire for the first five year period of Local Development Plan 2. It has been agreed that 150 private and 80 social rented houses can be delivered per annum between 2012 and 2024. This is higher than the assessment of the additional housing required to meet need and demand in West Dunbartonshire from the Housing Needs and Demand Assessment and reflects the likely pace and scale of delivery, based on recent development levels; the effective land supply; and financial support available for affordable housing.

In order to ensure that there is enough flexibility in the land supply to ensure the Housing Supply Targets can be met, a 15% level of generosity has been added to the Targets to provide the Housing Land Requirement. Table 1 shows that in the period from 2012 up to 2024, the Housing Land Requirement should have a total capacity of 3,170. These figures are also shown in Schedules 7 and 8 of Clydeplan.

Taking account of completions between 2012 and 2019, the adjusted housing land requirement for 2019 to 2024 is 1,837. Compared with the Housing Land Audit 2019, largely agreed by Homes for Scotland, and other sources of supply, there remains a surplus in the housing land supply over the housing land requirement, which equates to around 234 units to 2024.

<b>Table 2 – Housing Land Requirement 2024 – 2030</b>			
	<b>Private</b>	<b>Social Rented</b>	<b>All Tenure</b>
<b>A Housing Supply Target (2024 – 2030)</b>	<b>900</b>	<b>480</b>	<b>1,380</b>
<b>B Housing Land Requirement (2024 – 2030) (A + 15%)</b>	<b>1,035</b>	<b>552</b>	<b>1,587</b>
<b>C Surplus from 2017 – 2024</b>	<b>+85</b>	<b>+149</b>	<b>+234</b>
<b>D Supply 2024 – 2030</b>	<b>1,756</b>	<b>235</b>	<b>1,991</b>
<b>E Total Supply (C + D)</b>	<b>1,841</b>	<b>384</b>	<b>2,225</b>
<b>F Surplus 2024 – 2029 (E-B)</b>	<b>+806</b>	<b>-168</b>	<b>+638</b>

Table 2 above sets out the land supply position over the plan period from 2024 to 2030. The Housing Land Requirement for this period will be met by carrying over the surplus from the 2019-24 period and from additional land from the established supply and windfall sites. The post-2024 land supply in the 2019 Housing Land Audit indicates a significant amount of land in the private sector. It has been assumed less than a third of this land will produce completions in the 2024-30 period. In terms of social rented sites, which tend not to be identified so far in advance as those for the private sector, the sites in the established land supply have been augmented by some longer-term proposals identified in the Strategic Housing Investment Programme.

The existing housing land supply offers a generous supply of land for housing across West Dunbartonshire when compared to both the private and the social rented housing land requirement for the first five years of the land and beyond to 2030. However, Clydeplan also sets individual requirements for the Dumbarton/Vale of Leven housing market area and the Greater Glasgow North and West housing sub-market area (which includes Clydebank). At the time of adoption, a significant short-term shortfall was evident in the private housing land supply in the Clydebank area.

An assessment of all the development opportunities in this Plan was undertaken as part of the preparation of Local Development Plan 2. This suggested the de-allocation of some sites in the established supply, which are no longer expected to deliver new housing and have been therefore removed. In addition this Plan has identified a number of small to medium sites, identified within Schedules 2 and 3, which will add to the range and choice of housing sites on offer in the 2019 effective land supply.'

### **Page 80**

**Insert the following text under the heading 'Meeting Housing Land Requirements':**

'The housing land requirement for West Dunbartonshire plan area is set out in Schedules 8, 9 and 10 of Clydeplan (Strategic Development Plan).'

### **Page 82**

**Remove the following text:**

'Tables 1 and 2 over demonstrates that this approach identifies sufficient land to meet the housing supply target over the period of this Plan.'

## **Page 128**

### **Remove the following text:**

‘These totals do not equate exactly to those in Table 1. This is because sites currently under construction are included in the audit figures and not in the above column 2017- 24.’

## **Page 129**

### **Remove the following text:**

‘These totals do not equate exactly to those in Table 1. This is because sites currently under construction are included in the audit figures and not in the above column 2017- 24. Also for the later period some longer term projects from the SHIP are included in the social rented figures which are not yet in the audit.’