



Town and Country Planning (Scotland) Act 1997

Gate Check: Notification Section 16B(10) Notification of Sufficiency

Decision by Allison Coard, a Reporter appointed by the Scottish Ministers

- Evidence Report Reference: GATE-002-1
- Loch Lomond and Trossachs National Park Authority- Evidence Report Gate Check
- Date of submission: 18 December 2025
- Procedure: Further Information Request

Date of Notice: 21 May 2026

Decision

My assessment is that the Evidence Report is sufficient to enable the planning authority to prepare its local development plan.

Preliminary matters

The Loch Lomond and Trossachs National Park Authority (LLTNPA) Evidence Report was submitted on 18 December 2025 and I was appointed on 14 January 2026.

My assessment is based on the relevant sections of the Act, the National Planning Framework 4 (NPF4) and Scottish Government Guidance on Development Planning including the more recently published Action Plan and Advice.

A copy of this report has been sent to the council and to Scottish Ministers.

General

1. I find the report generally well organised and easy to follow with use of hyperlinks and back-ground reports. There is some repetition between Parts A and B, but it is clear that both form part of the Evidence Report. I address the matter of new evidence on household projections below along with my main conclusions on sufficiency. In carrying out my assessment, I note the extent of engagement and the fact that there are no outstanding matters recorded as disputes. I find only a few matters that are not fully addressed. I do not consider these indicate any overall insufficiency. Rather they point to matters the council should consider going forward and in proceeding timeously to prepare its proposed plan.

Topic 7: Housing

2. The evidence reporting on this topic is set in the context of the National Park Partnership Plan 2024-29 as well as Policies 16 (Quality Homes) and Policy 17 (Rural Homes) of NPF4. Population projections indicate that the National Park is expected to

experience a 7% population decline by 2043. Household growth is similarly low given low birth rates, an ageing population, and continued out-migration of younger adults. The growing presence of second homes and short-term rentals, particularly in areas like Cowal and Loch Lomondside is also rehearsed. This is stated to exacerbate affordability issues and reduce the availability of long-term housing.

3. Against this background evidence, an ambitious approach to the Indicative Local Housing Land Requirement is explained. This seeks to stimulate the housing market and to tackle projected trends that would not support the park's objectives. Whilst the National Park Plan identifies a minimum target of 30 homes per year the current local development plan target is for 70 homes per year. The Minimum all Tenure Housing Land Requirement (MATHLR) is established through NPF4 and is set at 300 homes reflecting land for 30 homes per annum over 10 years.

4. Whilst there is no separate Housing Need and Demand Assessments (HNDA) for the park area the Evidence Report (Topic 7) summarises the detailed content of a Population and Housing Background Paper (SD007). This considers all the housing evidence gathered from the constituent housing authorities – Argyll and Bute, Stirling, Perth and Kinross and West Dunbartonshire. Information is explained on the respective HNDA, Local Housing Strategies, Local Place Plans and Housing Land Audits.

5. National and local housing emergencies are explained along with current delivery challenges. This demonstrates a thorough approach to bringing together all the relevant evidence. To assist with interpreting the particular issues for the park area a report- Operation of the Housing System within Loch Lomond and the Trossachs National Park was published in November 2022. This is linked and summarised through Topic 7. This evidence is stated to form a cornerstone for addressing the National Park's housing crisis and guiding future planning decisions.

6. On affordable housing, the evidence indicates around 43% of households cannot afford homes even at lower quartile prices and 75% are priced out of average market prices. Rental costs are also high making social housing crucial for low-income households. Affordable housing delivery is referenced as an implication for the proposed plan but with relatively little detail as to next steps or any additional information that might be required. This is a matter that is likely to require more consideration, in consultation with relevant stakeholders, going forward into the next stages of plan preparation.

7. The selected Indicative Local Housing Land Requirement (ILHLR) indicates land for 75 homes per annum (750 over the 10-year period) more than double the MATHLR of 300 referenced above. This figure reflects a continuation of the strategy of the current local development plan and similarly seeks to support population retention, affordability, and sustainable communities.

8. A lower scenario of 450 homes is also rehearsed. This would align with the existing supply without the need for additional allocations. However, this scenario was not considered to fit well with the policy ambition of the park authority to stimulate growth and address wider housing pressures. Consequently, the Evidence Report concludes this figure would be overly cautious.

9. Similarly, the implications of a more ambitious approach, exceeding land for 750 homes, is also considered. It is acknowledged this could deliver greater choice. It could also potentially address unmet need and affordability more aggressively. However, the Evidence Report concludes this would require substantial new site allocations and so risk

overstretching local infrastructure to the detriment of other park priorities, including the protection of the environment and the character of rural settlements.

10. The 2024 Annual Housing Land Audit (SD006) demonstrates that the existing available land supply is strong: there remains capacity for 316 new units on allocated sites plus 102 on permitted windfall sites. A windfall assumption has been estimated of 150 over 10 years. The evidence suggests that there is adequate land to meet short-term needs. However, the indicative target points to some 182 additional units to top up that supply of housing land and reflect the expected windfall contribution. Monitoring between 2017 - 2024 shows that a total of 477 homes have been approved since 2017 (an average of 63 per year) with 281 completions.

11. Several Local Place Plans identify housing as a key issue with some identifying preferred locations for new housing. There is a commitment to take Local Place Plans into account in preparation of the new LDP spatial strategy and allocation of new housing sites. I note below the good progress made in achieving local place plan coverage across the park area. The proposed housing target was included within the Evidence Report consultation material. This provided stakeholders with the opportunity to comment. No disputes are recorded. Indeed, Argyll and Bute Council, Perth and Kinross Council, Homes for Scotland, and Persimmon Homes expressed their support for the target proposed.

12. From the narrative and supporting evidence, I consider the policy direction to support an ambitious figure is sufficiently explained. The uplift above the MATHLR seeks to challenge predicted decline and enable the Park's fourth statutory aim of supporting sustainable social and economic development. Recorded engagement and stakeholder consultation does not counter this ambition. In addition, I consider the ILHLR is sufficiently benchmarked in the context of completions, the established supply of land and the need to provide for additional opportunities.

New Information on housing

13. Given the passage of time, there has been some change in circumstance since the Evidence Report was prepared by the Park Authority:

- Publication of Scottish Government Advice [LDP - Evidence and gate checks: action plan and advice](#), February 2026
- Publication of household projections December 2025 based on the 2022 Census.

14. I issued a further information request in March 2026 asking whether the Evidence Report contained sufficient basis for the forthcoming plan, or alternatively whether the new projections indicated the report should be withdrawn to enable updating. The park authority's response recognises some change to the household growth projected for some of its constituent authorities. Both Argyll and Bute and Perth and Kinross show an increase of over 11.6 and 11.1 percent respectively from the previous 2018 based projections. Stirling and West Dunbartonshire are projected to experience a decline in the number of households of 5.2 and 3.6 percent respectively over the period to 2047. I recognise that there are no specific updated projections for the park authority and that the main centres of population in each council area fall outwith the park boundary.

15. The housing information included in the Evidence Report considers the earlier 2018 household projections but also a range of other information. The Evidence Report supports a figure that already more than doubles the MATHLR. The position of the park authority following my further information request takes further stakeholder consultation into account. Generally, this is supportive of retaining the approach set out in the Evidence Report.

16. Homes for Scotland consider that if the process is to proceed, based on the evidence base at the time of the submission, the planning authority should consider the updated evidence through the next stages of preparing the proposed plan. It should justify whether, or not, to take account of any changes. The response goes on to state that ongoing engagement would be welcomed with a view to preparing a joint statement detailing areas of agreement and disagreement. It is hoped this would lead to a shorter and more focussed discussion on housing at an Examination.

17. Bringing together all of the above, the new household information has become available very late in the evidence reporting process. The park authority response to my further information request indicates a clear intention to consider any new information through the next stages of the plan preparation process. In addition, I am conscious that the Evidence Report already sets an ambitious target and that the updated household projections cannot at this stage be attributed directly to the park area.

18. Nevertheless, whilst setting the ILHLR should reflect as much certainty as possible the ongoing process will require confirmation of the Local Housing Land Requirement. This can include any further explanation and address any new evidence whether or not this leads to any alteration of the ILHLR. I consider that continued engagement with Homes for Scotland and other stakeholders will be an important aspect of moving through these next stages of plan preparation.

19. I find that, in this case, the housing evidence provides sufficient basis on which to proceed. An advisory is included in Annex 1. This reflects the acknowledged need to rehearse and consider the implications of updated household projections and other emerging information, working with stakeholders as appropriate, through the next steps of the plan process.

Topic 3: Infrastructure - Education and Health

20. There is an acknowledged data gap in schools information for Perth and Kinross and West Dunbartonshire Council although detailed information is available for Stirling and Argyll and Bute. There is data available for McLaren High School, the only secondary school located within the National Park boundary. The evidence recorded at Table 2 indicates that most primary schools within the National Park are operating below capacity, with 50% of these schools functioning at less than half of their optimum.

21. Based on the available future school roll projections, there are stated to be no concerns about working capacity being exceeded within primary schools located in the Argyll and Bute, Perth and Kinross and West Dunbartonshire Council boundary areas of the National Park between now and 2034/35. However, projections for schools within the Stirling Council area indicate that Drymen Primary School is expected to exceed its working capacity from the 2027/28 school year onward. Tables 6-11 in the appendix to Topic 3 set out the detailed evidence on school capacity and projections.

22. Given the commitment to continue to actively engage with the constituent education authorities, I consider the information contained in the evidence report is sufficient at this stage. Further targeted capacity assessment could form part of the site assessment process. Conditions ratings are set out for specific schools.

23. For health there is information on current facilities and more limited information on capacity. There is an indication that developer contributions may be sought but a corresponding lack of clarity as to any remaining evidence gap or next steps that may apply

in the context of the advice set out in Circular 4/2025. The four NHS health boards covering Loch Lomond & The Trossachs National Park are supported by four Health and Social Care Partnerships, which integrate services across local authorities, health boards, and third-sector organisations. I understand that there have been difficulties in receiving response or information from the relative health boards. Page 247 of Part B of the Evidence Report states that trends highlight the need for targeted healthcare planning and infrastructure investment.

24. This leaves some ambiguity around the future application of this evidence and the extent to which it is intended to be developed further in support of any approach to developer contributions. This has been a common issue in Evidence reporting to date. It may be the park authority can still address this going forward working collaboratively with the relevant stakeholders and through the sharing of best practice. I include an advisory in relation to this matter.

Topic 6: Sustainable Transport

25. There is an acknowledged evidence gap in the availability of road safety data for the National Park within Perth and Kinross, Argyll and Bute and West Dunbartonshire councils. This is a matter to be addressed through further active engagement with the relevant Local Authorities within the National Park boundary. This information will be used to inform the proposed plan and support the development of future planning and road safety measures.

26. The Sustainable Travel Options Appraisal and Modal Shift Report, alongside supporting datasets, will inform the transport appraisal approach. In turn this should ensure alignment with national policy and Transport Scotland's Development Planning and Management Transport Appraisal Guidance. I note that Transport Scotland support a proportionate appraisal of the proposed plan's potential spatial strategy and options given demand is unlikely to have a notable impact on the Strategic Transport Network. Following some agreed changes to the draft report Transport Scotland agreed the current content in October 2025. I find nothing that points to any insufficiency in the rehearsal of the evidence on this topic.

Other Matters

27. Key agencies have confirmed they are content with the Evidence Report relevant to their respective interests. The report details how earlier comments were taken into account and substantially agreed. Whilst the park authority records no disputes with regard to the content of its Evidence Report some matters are raised by community councils and others which are more aligned to the next steps of strategy and policy development. I agree that these do not raise matters of insufficiency at this stage.

28. The reporting indicates to me that proportionate engagement was carried out across the relevant topic papers. The only recorded responses I was unable to track were from Sports Scotland and the Health and Safety Executive although the former are recorded as having been invited to comment. As referenced above there is also an absence of recorded response from the relevant Health Boards. Commendable progress has been made to advance local place plans across the area as recorded in Table 3 – Summary of Local Place Plans (SD011 - SD026).

29. I have identified a few remaining gaps in the information on Coastal Erosion and Artificial Coastal Defences given recognition that this is an area where Coastal Change Adaptation Plans are emerging. In addition, additional information on minerals should be pursued to take account of NPF4 and the more local context of established operators. There is

an absence of recorded engagement in this respect. Going forward, further supporting information is also likely to be required around the matter of instigating referenced change in relation to biodiversity enhancement. I also note the Open Space Audit (2007) is now quite dated. The Open Space and Play Sufficiency Assessment is however up to date having been finalised in 2025.

30. Homes for Scotland, in its response, references a suggested approach to site appraisal methodology. Part A of the Evidence Report at Section 1.2 refers to site appraisal as being a core element in shaping the new local development plan. The text goes on to state that a detailed methodology has been developed and is included as part of the Evidence Report. It may be that reference is included in error from an earlier draft. I note that a separate background report is included in the wider submission: Site Assessment Framework (SD069). However, this does not appear, even in summary form, as part of the Evidence Report which is the focus of my assessment.

31. I appreciate that a lot of the information is referenced as having a role in site assessment. In addition, the linked interactive spatial mapping (SD001) will be a useful tool in this respect. I do not consider the lack of inclusion of the site assessment framework, as a clear part of the Evidence Report, is a matter of sufficiency. Nevertheless, other planning authorities have chosen to include this detail so that it is transparently established at an early stage. Inclusion is a matter suggested in Scottish Government Guidance. Going forward, transparency and engagement with stakeholders on the process of site assessment should enable good practice. I have included an advisory to this effect.

Conclusion

32. Overall, I find nothing to alter my conclusion that the Loch Lomond and Trossachs National Park Authority can now proceed to prepare its proposed plan.

Allison Coard

Reporter

Appendix 1 – Advisories

Relevant part of re-submitted evidence report	Gaps/remaining matters
Topic 7: Housing including affordable housing.	In the preparation of the proposed plan, set out in a background housing paper any implications of the up-to-date household projections. This should involve working with relevant stakeholders as required. Address any further information required to support affordable housing delivery.
Topic 3 - Health and Education	Continue dialogue and capacity assessment with the relevant authorities and stakeholders based on the requirements of Circular 4/2025 Address the education data gap for Perth and Kinross Council and West

	Dunbartonshire Council as far as required to inform preparation of the proposed plan.
Topic 4 – Flood risk	Update the Strategic Flood Risk Assessment Interactive map as information becomes available and as necessary to inform site assessment.
Topic 6 – Sustainable Transport	Address gaps in the availability of road safety data at the National Park Authority level for Perth and Kinross, Argyll and Bute, and West Dunbartonshire Councils as far as necessary to inform site assessment and the proposed plan.
Coastal Erosion and Artificial Coastal Defences	Confirm status of Coastal Change Adaptation Plans and collate evidence to better inform the Park Authority's approach to coastal risk management.
Topic 10 rural economy: Minerals	There has been no apparent engagement in the local context with the two referenced mineral operators. Address any further work required in taking account of NPF4.
Summary of evidence report engagement topic paper	If not already advanced address engagement with the Health and Safety Executive and Sport Scotland.
Topic 2 Biodiversity, Natural Places, Forestry, Woodland and Trees	Address Table 3 Nature Network data gaps in so far as appropriate to inform preparation of the proposed plan. Clarify the information and justification required to support the step change indicated on page 36 of the Evidence Report (Part B). Consider further best practice assessment methods including the Scottish biodiversity metric that is currently being developed by NatureScot.
Site assessment methodology	Work has clearly progressed on this as set out in document SD069. However, its status as part of the Evidence Report appears unclear. A transparent methodology, prepared timeously in consultation with relevant stakeholders, should assist an effective process going forward.