

By e-mail: [NPF4housingland@gov.scot](mailto:NPF4housingland@gov.scot)

03 June 2021

Dear Sir / Madam,

**CONSULTATION OPPORTUNITY ON THE MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT FOR INCLUSION IN NATIONAL PLANNING FRAMEWORK 4 (NPF4)**

I write in relation to the above, to lend support to and reinforce the significant concerns expressed by Dumfries and Galloway and Scottish Borders Councils in response to the figures set out to support future house building across the South of Scotland.

In terms of context, the South of Scotland is embarking upon a new chapter and looking to the future with a greater optimism than at any time in the past. The opportunity to make a real and lasting difference, to address long standing and deep-rooted challenges, and to build back an economy which is stronger, greener and fairer for all has never been so great. This reflects that the South now has:

- its own dedicated economic development agency, in the form of SOSE, which took up its powers on 1 April 2020, the main aim of which is to drive inclusive growth, increase competitiveness, and tackle inequality within the region, establishing the South of Scotland as a centre of opportunity, innovation and growth;
- a well-established Regional Economic Partnership (REP) at the heart of a new regional economic landscape, bringing together a wide range of public, private and third sector interests around a shared ambition to drive forward and accelerate the delivery of inclusive and sustainable growth across the region;
- a draft Regional Economic Strategy, developed by the REP, which for the first time sets out a vision and priorities for the whole of the South of Scotland, with the opportunity having been taken to align the strategy with the Indicative Regional Spatial Strategy for the South;
- a committed and tangible pipeline of strategic investments, of a scale and value unprecedented in recent times, in the form of the Borderlands Inclusive Growth Deal and through inclusion of the Scottish Borders in the Edinburgh and South East City Region Deal;
- growing recognition of the strategic importance of the region at the heart of the UK and, of elevated importance post the UK's exit from the EU, its role as a gateway to the European Market owing to its proximity and established connections with Northern Ireland; and
- an excellent track record of strong and effective partnership working, typified by the adoption by SOSE, Dumfries and Galloway and Scottish Borders Councils and others of a coordinated and single team 'South of Scotland' mentality, across the COVID-19 response.

Work on the Regional Economic Strategy, a draft of which is due to be considered and approved for consultation by the REP at their meeting on 08 June, has reaffirmed that the region's ageing and declining population remains amongst the biggest challenges the South of Scotland faces. Working age population in the South of Scotland, which is a large and predominately rural region, is projected to decline by 15% or 24,100 people by 2041<sup>1</sup> – a much more acute challenge than the projected 4% decline for Scotland as a whole and in stark contrast to the 8% projected increase for the United Kingdom.

In response, and aligned with one of the key objectives of the Borderlands Inclusive Growth Deal, the South of Scotland's RES identifies, under the key theme of Thriving and Distinct Communities, the need to increase the supply of housing and the pursuit of "ambitious" housebuilding as a key priority for the region. This is needed to support ambitions to attract more people to the region as well as supporting the retention of those already here, and specifically our young people.

The proposed figures for the South, being significantly less than existing targets within the region's Local Development Plans and past rates of actual completions (even across periods of recession), fall well short of the South of Scotland's strategic ambitions, for which firm plans and arrangements are already in place to drive forward.

The figures also appear to have no regard to future demand which in the South of Scotland is envisaged to increase – driven by future ways of working which the COVID-19 pandemic has accelerated, alongside a re-evaluation by many of their lifestyles and a greater desire for increased access to open space and the natural environment, which the South of Scotland has in abundance. Our region is already seeing strong and increased demand for homes as we exit COVID-19 restrictions, the consequence of which is marked increases in house prices.

Whilst noting the figures proposed are caveated as being a 'minimum', this does not create the certainty that is needed to drive investment decisions. To attract more developers to our region for example, drawing them down from the Central Belt and up from the north of England, we know that an appropriate critical mass of housing land will be needed. Similarly, the development of local supply chains, which will give rise to local jobs, and investment in the skills offer needed to support growth in the construction sector will also require clear market signals to instil confidence to invest.

The South of Scotland is extremely lucky to have a visionary and ambitious Registered Social Landlord sector who have a strong desire to grow. Ongoing work on a community wealth building pilot in the region has highlighted the significance of RSLs as anchor institutions to support increased wealth retention within the region, but reduced rates of new housing delivery will evidently act to constrain this opportunity.

In conclusion, the figures put forward for future housing delivery across Dumfries and Galloway and Scottish Borders fall well short of the South of Scotland's economic and social ambitions. As they stand, the figures threaten to constrain the South's economy, prejudice national as well as local ambitions to grow our population, and would frustrate efforts to create a balanced and fair housing market which affords all the opportunity to gain and sustain independence and grow and improve their prospects including in terms of health and wellbeing.

---

<sup>1</sup> Skills Development Scotland (2019). Regional Skills Investment Plan for the South of Scotland. Available online at <https://www.skillsdevelopmentscotland.co.uk/media/45740/south-of-scotland-sip.pdf>

SOSE is committed to continuing to work with and to support both Councils, building on excellent joint working to date, to help shape the emerging NPF4, ensuring that the framework it provides is responsive to the South of Scotland's needs and opportunities and that it strengthens and not prejudices our ability to deliver on the South's ambitions.

Your sincerely,



**Jane Morrison-Ross**  
**Chief Executive**  
**South of Scotland Enterprise**