

National Planning Framework 4

Dumfries and Galloway

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
Dumfries and Galloway	400	4,250

The locally adjusted estimate is primarily driven by household projections.

The Council suggest that the initial default estimate of 400 units does not align with national and regional policy aspirations to significantly invest in the South of Scotland, to re-populate rural areas and they ignore past completions data.

Consideration is given to past completions in that National Records of Scotland indicate 2,966 completed units using NB1/NB2 ([Housing statistics quarterly update: new housebuilding and affordable housing supply - gov.scot](#) (www.gov.scot)). The Council also refer to their Housing Land Audit (HLA) which indicates there has been 3,851 completions over the same period – 2010 to 2019. A difference of 855 units.

The locally adjusted estimate proposed is 4,250 units.

2 Household Projections (Newly-Forming Households)

The Council has proposed an alternative household projection as they anticipate an increasing trajectory for household projections from 2022 to 2037.

The alternative projection was initially based on the National Records of Scotland (NRS) 2018-based principal variant. The method then added the HLA completions at 2017/18 (257) to each subsequent year of the projections.

The Council sets out the policy drivers as to why they chose to adjust the household projection upwards including:

- to reflect HLA anticipated site programming
- to reflect the ambition for affordable homes set out in Housing 2040 and the commitment to the Council's affordable housing planning assumption of £106 million for the next 5 years
- to reflect the ambitions for economic growth in the Borderland's Inclusive Growth Deal and South of Scotland Enterprise's draft Regional Economic Strategy, which has been aligned with the Indicative Regional Spatial Strategy for the South of Scotland

- to reflect a possible future trend in home-working as set out in A Scotland for the Future and as a possible impact of COVID-19
- to reflect the growing recognition of the strategic importance of the region post-Brexit, owing to its proximity and connections with Northern Ireland
- to reflect the aim of stemming rural depopulation as set out in the NPF4 Position Statement

A supplementary submission from the Council indicates an updated preference to use the NRS high migration variant and build on this by applying a gradually increasing percentage.

- 0.2% increases between 2023-2025
- 0.3% increases between 2026-2028
- 0.4% increases between 2029-2031
- 0.5% increases between 2032-2034
- 0.6% increases between 2025-2037

This is to reflect the long term impact the policy drivers noted above will have on household formation rates. The Council note that this results in a more accurate minimum figure, using a household projection of 2,804.

Housing Projection: Default Compared to Adjusted Estimates

	Default	Adjusted
Dumfries and Galloway	50	2,800

3 Existing Housing Need

Existing Housing Need: Default Compared to Adjusted Estimates

	Default	Adjusted
Dumfries and Galloway	250	700

The Council propose an alternative existing housing need figures comprising the following elements:

- Households in Temporary Accommodation (181)
- Overcrowded households from the region’s Common Housing Register waiting list (transfers excluded) (476)
- Households with adults with complex needs requiring an additional unit of housing (63)

4 Flexibility Allowance

The Council use the rural 30% flexibility.

CORE PROCESSES ASSESSMENT	
1	<p>Using the Response Template and Excel Calculator</p> <p>The Response Template has been used to make the case for change, word limits are not exceeded and its completion is correct. A copy of the adjusted Excel Calculator has been provided.</p>
2	<p>Housing Market Partnership and Stakeholders Involvement</p> <p>Dumfries and Galloway HMP is made up of Loreburn Housing Association, Cunninghame Housing Association, Dumfries and Galloway Housing Partnership, Dumfries and Galloway Council – Homeless, Integrated Joint Board and Story Homes.</p> <p>The response indicate that the HMP took into account the region’s ageing population and support for living independently, as well as the influence of net zero carbon policy.</p> <p>The HMP agreed the adjusted estimate.</p> <p>South of Scotland Enterprise (SoSE) were consulted in respect of the initial default estimate for Dumfries and Galloway and Scottish Borders. Their letter of support for the locally adjusted estimate was received and noted.</p>
3	<p>Joint Housing and Planning Senior Official Sign-Off</p> <p>Appropriate senior officers from Council have signed-off the submissions.</p>
4	<p>Statistical Evidence</p> <p>The Council has used some robust sources of statistical evidence to support their case including:</p> <ul style="list-style-type: none"> • NRS, 2018-based household projection (principal) • Scottish Government estimate of homeless households in temporary accommodation. <p>They have also used some in-house sources of data.</p>
5	<p>Policy Evidence</p> <p>Dumfries and Galloway identify a series of policy drivers that influence housing land requirement. These include:</p>

- The 2019 Housing Land Audit that includes anticipated site programming for Local Development Plan 2 allocated sites and major applications (4,047 units completed over the next 7 years and a further 4,696 beyond)
- The Strategic Housing Investment Plan (SHIP) that aims to deliver 1,886 affordable homes over the next 5 years
- Housing to 2040 that seeks to deliver 100,000 affordable homes by 2031/32
- NPF4 Position Statement that supports housing development in rural areas, helping to stem rural depopulation and supporting communities to thrive
- ‘A Scotland for the Future’ with its aim to attract and retain people in areas that were facing depopulation
- Dumfries and Galloway’s high fertility rate
- The Scottish Government aim to prevent and end homelessness and eradicate rough sleeping
- The Impact Covid-19 has had on lifestyles
- The Borderlands Inclusive Growth Deal which estimates the delivery of approximately 5,500 job opportunities and will attract workers and families to the area suggesting more homes will be required
- A South of Scotland Regional Economic Strategy which will require more homes

MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)

For the reasons specified above, the proposed MATHLR is:

	MATHLR
Dumfries and Galloway	4,550