

# **National Planning Framework 4**

## **Scottish Borders**

### **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

	<b>Initial Default Estimate</b>	<b>Locally Adjusted Estimate</b>
Scottish Borders	1,750	4,400

The locally adjusted estimate is primarily driven by the projections for newly forming households. The Council consider the initial default estimates of 1,750 units to be too low. The Council does not consider that this takes into account past completion rates or the numerous policy drivers, which seek to attract people to live and work within the region, help boost the economy and meet the required rise in the number of households.

It is considered that the average completion figure established through the Housing Land Audit at 330 units per annum (2010-2019) is more realistic than the initial default estimate of 1,750 units (175 units per annum) The adjusted estimate of 4,400 units exceeds the 10 year HLA completions trend of around 3,500 units.

### 2 Household Projections (Newly-Forming Households)

The Council has proposed an alternative household projection. They use the National Records of Scotland (NRS) principal migration variant as the starting point for the alternative.

The Council indicate they have chosen to adjust the household projection upwards of the initial default to reflect the housing and economic growth aspirations of the following:

- Housing Land Audit programming
- Affordable housing investment set out within the Strategic Housing Investment Plan
- South of Scotland Enterprise drive for inclusive growth
- Housing 2040 vision for housing in Scotland
- Borderlands Inclusive Growth Deal
- Indicative Regional Spatial Strategies
- South of Scotland Regional Economic Strategy
- Potential shifts resulting from the pandemic
- City of Culture bid
- Regional Prosperity Framework
- NPF4 Position Statement, particularly rural development

A supplementary submission produced up-dated projections. These also use the NRS principal migration variant as the base and applying a percentage growth to this year on year, increasing from 0.2% to 0.9% over the 15 year period. This is considered to be ambitious but realistic growth over the 15 year period, resulting in 8.6% growth between 2022 and 2037. This produced a projection for households of 3,309.

**Housing Projection: Default Compared to Adjusted Estimates As Well As MATHLR**

	Default	Response	MATHLR
Scottish Borders	1,250	3,300	3,300

**3 Existing Housing Need**

**Existing Housing Need: Default Compared to Adjusted Estimates As Well As MATHLR**

	Default	Response	MATHLR
Scottish Borders	100	100	400

Initially, the Council accepted the default existing housing need figure but indicated it was too low. The Council noted that they did not have enough evidence at that time to suggest an alternative estimate, although they do acknowledge that the Housing Need and Demand Assessment (HNDA) 3 for South East Scotland was underway which could in due course suggest an alternative.

A supplementary submission provides information based on the HNDA work, resulting in an increase to a more realistic 385 units as follows:

Changes from HNDA Tool	New Figure	Data Source	Authority Comments
Homeless / Temporary	260	HL1 Live cases 31st March 2021	Using live cases provides a more realistic figure for homelessness need. Homeless households in temporary accommodation only account for approx. a third of homelessness cases so underestimates the existing need from homeless households. As of March 2021 there were 277 live cases, 6% of these cases (the average over the past 3 years) have found accommodation in PRS so these have been deducted from the total = 260
Both Overcrowded and Concealed	22	HNDA Tool	Uses HNDA Tool estimates for concealed and overcrowded based on the Census (2011) but uprated with SHS/SHCS 2017-2019 household estimates.

	Support needs / special forms of housing	103	Border Joint Learning Disability Service March 2021	The Borders Joint Learning Disability Service, identifies 10 people who are currently on specialist out of area placements. In addition the service maintains a Transitions tracker to monitor young people coming through “the system” in order to identify, prioritise, provide and commission support and care needs. The tracker currently identifies 64 young people as a snapshot in time, meaning a total of 74. SBC's Wheelchair Housing Study identifies 65 wheelchair user households registered for social housing. Of these 29 of these are not already in the social rented sector so would not free up another home in the sector.
<b>4</b>	<b>Flexibility Allowance</b>			
	The Council use the default 30% rural flexibility.			

### CORE PROCESSES ASSESSMENT

<b>1</b>	<b>Using the Response Template and Excel Calculator</b>
	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.
<b>2</b>	<b>Housing Market Partnership and Stakeholders Involvement</b>
	<p>Scottish Borders engaged through the South East Scotland (SES) HMP, inviting views on the initial default estimates. The authority also liaised with Dumfries and Galloway Council. The SES authorities collectively met with Homes for Scotland.</p> <p>The SES HMP comprises Departments within Scottish Borders Council, including; planning, corporate policy, health and social care partnerships, homelessness and economic development, Berwickshire Housing Association, Eildon Housing Association, Scottish Borders Housing Association, Waverley Housing, Borders Third Sector Partnership, Homes for Scotland, CALA Homes, MacTaggart &amp; Mickel, Walker Group (Scotland) Ltd, Persimmon Homes East Scotland, Robertson Homes, Avant Homes, Stewart Milne Homes, Barratt Homes &amp; David Wilson Homes, Dandara, Miller Homes,</p>

	<p>Cruden, Taylor Wimpey East Scotland, Bellway, Bield HA, Trust HA, Link HA Ltd.</p> <p>The only comments received were from Homes for Scotland who proposed a housing land requirement of 4,473 units. Whilst accepting there was limited time to consult the HMP on the locally adjusted estimate, the similarity between the Homes for Scotland estimate of 4,473 and the Council's adjusted estimate is noted.</p> <p>South of Scotland Enterprise (SoSE) were consulted in respect of the adjusted estimate for Dumfries and Galloway and Scottish Borders. Their letter of support for the adjusted estimates was received and noted.</p>
<p><b>3</b></p>	<p><b>Joint Housing and Planning Senior Official Sign-Off</b></p> <p>Appropriate senior officers from council have signed-off the submissions.</p>
<p><b>4</b></p>	<p><b>Statistical Evidence</b></p> <p>The Council has used some robust sources of statistical evidence to support their case including:</p> <ul style="list-style-type: none"> <li>• NRS household projection</li> <li>• Scottish Government homeless statistics</li> <li>• Scottish Government estimate of concealed and overcrowded households</li> </ul> <p>They have also used some in-house sources of data including:</p> <ul style="list-style-type: none"> <li>• HLA completions</li> <li>• Specialist housing and support needs tracker</li> </ul>
<p><b>5</b></p>	<p><b>Policy Evidence</b></p> <p>Scottish Borders Council reference policy drivers including:</p> <ul style="list-style-type: none"> <li>• Housing Land Audit programming</li> <li>• Affordable housing investment set out within the Strategic Housing Investment Plan</li> <li>• South of Scotland Enterprise drive for inclusive growth</li> <li>• Housing 2040 vision for housing in Scotland</li> <li>• Borderlands Inclusive Growth Deal</li> <li>• Indicative Regional Spatial Strategies</li> <li>• South of Scotland Regional Economic Strategy</li> <li>• Potential shifts resulting from the pandemic</li> <li>• City of Culture bid</li> </ul>

- Regional Prosperity Framework
- NPF4 Position Statement, particularly rural development

The Council notes that authorities in the South East of Scotland are currently in the process of producing HNDA3.

### **MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR)**

For the reasons specified above the proposed MATHLR is:

	<b>MATHLR</b>
<b>Scottish Borders</b>	4,800