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**RESPONSE TO  
DUMFRIES AND GALLOWAY LDP2  
MAIN ISSUES REPORT AND ENVIRONMENTAL REPORT**

**24 APRIL 2017**

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# RESPONSE TO DUMFRIES AND GALLOWAY LDP2 MAIN ISSUES REPORT AND ENVIRONMENTAL REPORT

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## 1. Introduction

- 1.1 Homes for Scotland is the voice of the home building industry in Scotland, with a membership of some 200 organisations together providing 95% of all new homes built for sale across the country as well as a significant proportion of affordable housing.
- 1.2 Homes for Scotland makes submissions on national and local government policy issues affecting the industry. Its views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from our member companies

## 2. The Proposed LDP 2 Vision and Spatial Strategy (Question 1)

- 2.1 It is noted that Dumfries and Galloway Council's proposed to retain the existing Vision and Spatial Strategy set out within LDP 1 and this is supported by Homes for Scotland.
- 2.2 The continued emphasis within the Council's Vision on Dumfries consolidating its position as the Regional Capital is supported, as is the promotion of vibrant towns and villages that have "*housing developments of a scale appropriate to their location that incorporate features such as open space, green networks, SuDS and are based around sustainable transport modes*".
- 2.3 Homes for Scotland supports the promotion of a sustainable pattern of development sought by the Council's Spatial Strategy. It is acknowledged that this approach complies with place-making policy principles set out in Scottish Planning Policy (2014), which requires planning to direct the right development to the right place.

## 3. The Proposed LDP 2 Approach to Achieving a Generous Supply of Housing (Question 11)

- 3.1 Homes for Scotland supports the addition of a 20% generosity allowance to the housing land supply target. It is acknowledged and agreed that this approach will allow for greater choice and flexibility in the allocated land supply, thereby ensuring that sufficient land for housing is provided. It is acknowledged that this approach is in line with Scottish Planning Policy.

#### **4. The Proposed LDP 2 Housing Land Requirement (Question 12)**

- 4.1 The proposed approach to the allocation of the housing land requirement figure, as set out in the MIR consultation document, is endorsed by Homes for Scotland. In particular, Homes for Scotland members welcome the proposed allocation of a minimum of 50% of housing units within the Dumfries Housing Market Area, to the Regional Capital, Dumfries, as outlined in Table 5.
- 4.2 This proposed approach reinforces the Council's vision for Dumfries by focusing the majority of future housing development within the Dumfries Housing Market Area to a settlement with a good range of services, facilities and employment opportunities.

#### **5. The Proposed LDP 2 Approach to the Delivery of Sites and New Homes (Question 13)**

- 5.1 The Main Issues Report (MIR) consultation document recognises that there are specific challenges that the house building sector in Dumfries and Galloway faces, namely the presence of a number of small scale builders and those wishing to build their own home. In response to this the MIR consultation documents proposes a number of mechanisms to assist the delivery of housing sites.
- 5.2 It is contended that several of these mechanisms would contribute to the successful delivery of housing sites at any scale proposed. Homes for Scotland is supportive, in principle, of the creation of a Housing Development Forum, to advance delivery of new affordable homes brought forward by additional Scottish Government funding and their commitment to delivering 50,000 additional new affordable homes by March 2021.
- 5.3 Homes for Scotland also supports the Council's intention of developing and expanding the Action Programme, and considers that closer collaboration with landowners, developers and infrastructure providers to produce a delivery and phasing programme, would be beneficial in the effective delivery of housing sites and the construction of new homes.

#### **6. The Proposed LDP 2 Approach to Long Term Housing Sites (Question 14)**

- 6.1 Homes for Scotland consider it important for Local Development Plans to set out a long term view of development within an area that extends beyond a particular Plan period. This provides a degree of certainty in respect of the long term housing land requirement in the absence of a strategic development plan for the area, in line with the methodology stipulated by Scottish Planning Policy.

6.2 Homes for Scotland is therefore supportive of the Council's current approach to long term housing sites, i.e. provision of an indication of the possible scale and location of the housing land requirement beyond year 10 and up to year 20.

## **7. The Proposed LDP 2 Approach to Affordable Housing and Particular need Housing (Question 15)**

7.1 The current policy approach that requires for a maximum of 20% affordable housing within all developments of five or more units is supported by Homes for Scotland and it is agreed that this approach should be carried forward into the second iteration of the Dumfries and Galloway Local Development Plan.

### **Prepared by:**

Neil Martin  
Principal Planning Advisor  
n.martin@homesforscotland.com

Homes for Scotland  
5 New Mart Place  
Edinburgh  
EH14 1RW  
Tel: 0131 455 8350  
Fax: 0131 455 8360  
Email: [info@homesforscotland.com](mailto:info@homesforscotland.com)  
Web: [www.homesforscotland.com](http://www.homesforscotland.com)  
Twitter: @H\_F\_S