



## **Topic Paper – Quality Homes and Site Assessment Methodology**

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## 1. Introduction

This topic paper reviews evidence identified as relevant in relation to the topic of housing in support of the preparation of Dundee Local Development Plan. The findings of the paper will provide a robust evidence-base to inform the Proposed Plan, and the resulting spatial strategy for housing.

This topic paper will be primarily addressing National Planning Framework 4 (NPF4) **Policy 16 – Quality Homes**. The paper will also consider a plan-led approach to establishing an indicative Local Housing Land Requirement (LHLR) figure.

Dundee is an urban authority as per the [Scottish Government's Urban Rural Classification 2020](#), and as a result this topic paper will not include evidence on NPF4 Policy 17: Rural Homes or NPF4 Policy 29: Rural Development.

The topic paper summarises all evidence and data identified and considers specifically its relevance to Dundee. The implications of the evidence and data have been considered and how this might inform the Proposed Plan. The conclusions set out are based on a professional judgement as to the land-use planning implications of data examined.

The topic paper also outlines consultation that has been undertaken thus far, in identifying evidence and datasets through a key stakeholder group and the current stage of public consultation.

## 2. Identification of Evidence/ Datasets

NPF4 POLICY	EVIDENCE/DATASET AND SOURCE
<b>Policy 16: Quality Homes</b>	<a href="#">Draft NPF4 (National Planning Framework 4) – Housing land requirement explanatory report</a> (2021)
	<a href="#">MATHLR Assessment Report (Dundee)</a> (2021)
	<a href="#">NPF4 – housing land requirement – report addendum</a> (2021)
	<a href="#">Housing to 2040</a> (2021)
	<a href="#">Scottish House Condition Survey</a> (2019)
	<a href="#">A Scotland for the future: opportunities and challenges of Scotland’s changing population</a> (2021)
	<a href="#">A Scotland for the future: opportunities and challenges of Scotland’s changing population</a> (2021)
	<a href="#">Local Development Plan evidence report – defining Gypsies and Travellers: consultation analysis</a> (2023)
	<a href="#">Housing Statistics 2022 &amp; 2023: Key Trends Summary</a> (2023)
	<a href="#">Homelessness in Scotland: update to 30 September 2023</a> (2023)
	<a href="#">Scottish House Condition Survey: 2022 Key Findings</a> (2022)
	<a href="#">Dundee Housing Land Audit</a> (2023)
	<a href="#">Greater Dundee HNDA</a> (2023)
	<a href="#">Dundee Strategic Housing Investment Plan 2023-2028</a>
	<a href="#">Dundee Local Housing Strategy</a> (2019 – 2024)
	<a href="#">Savills' Dundee Reports - Increasing Residential Capacity</a> (2023)
	<a href="#">PAS/ NHS Scotland - Using the Place Standard tool to assess the quality of Gypsy/Traveller sites</a> (2019)
Purpose Built Student Accommodation Geographic Information System (GIS)	
Liveable Neighbourhoods Data Tool	
	<a href="#">Existing Housing Need in Dundee City</a> (2024)

## **3. Policy Context**

### **3.1 National Policy Context**

#### **The Planning (Scotland) Act 2019**

The Planning (Scotland) Act 2019 amends the Town and Country Planning (Scotland) Act 1997 and introduces a range of obligations in relation to housing requirements in LDPs. Section 15 (5) of the Act states that the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people must be considered. In addition, Local Development Plans (LDP) must publish a Local Housing Land Requirement (LHLR) which sets a target for meeting the housing needs of local people.

#### **National Planning Framework 4**

In January 2023, the Scottish Government delivered a new spatial plan for Scotland. The fourth [National Planning Framework \(NPF4\)](#) sets a vision for what Scotland could and should look like by 2050. The framework integrates national planning policies and provides a long-term plan for future development. NPF4 is driven by the overarching goal of addressing climate change, and focuses on achieving four key outcomes:

1. Net zero emissions
2. A wellbeing economy
3. Resilient communities
4. Better, greener places

Policy 16 encourages, promotes and facilitates the delivery of more high-quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland.

The policy promotes a plan-led approach and prioritises development on allocated housing sites identified in the LDP. The policy principles outline that LDPs are expected to identify a LHLR for the area they cover, and deliverable land should be allocated to meet the 10-year LHLR in locations that create quality places for people to live. The LDP Delivery Programme is also expected to establish a deliverable housing land pipeline for the LHLR.

#### **Housing to 2040**

[Housing to 2040](#) sets out a vision for housing in Scotland to 2040 and is the first long-term national housing strategy. It aims to deliver the Scottish Government's long-term ambition for everyone to have a safe, good quality and affordable home that meets their needs in the place they want to be.

Over the period to 2031/32, the Housing to 2040 strategy makes a commitment to increasing housing supply by setting an ambitious target to deliver 100,000 affordable homes, with at least 70% of these homes for social rent. The strategy is supportive of initiatives such as town centre living, 20-minute neighbourhoods and a place-based approach to development which aligns with NPF4.

### 3.2 Local Policy Context

The [Local Development Plan \(2019\)](#) seeks to encourage a design-led approach to sustainable, high-quality placemaking, with the purpose of achieving quality residential environments through delivering new housing, and in guiding the changes to existing homes and residential areas.

As such, Dundee’s current LDP has a significant emphasis on housing and has a range of policies to support the delivery of quality housing. Table 1 outlines the key LDP policies which guide development in relation to housing:

LDP Policy	Explanation
<b>Policy 9</b>	Housing land release states that priority will be given to the development of the allocated brownfield and greenfield sites.
<b>Policy 10</b>	Design of new housing states that the design and layout of new housing developments in Dundee should be of a high quality and contribute to creating places that respect and enhance the distinct character and identity of the different parts of the city.
<b>Policy 11</b>	Householder development states that householder development will be supported where it meets 4 criteria as outlined in the policy.
<b>Policy 12</b>	Formation of New Residential Accommodation states that the creation of new residential accommodation through the development of existing roof/basement space or the subdivision of existing residential accommodation or change of use will be supported where it meets 3 criteria as outlined in the policy.
<b>Policy 13</b>	Development of Garden Ground for New Housing states that the development of garden ground for new houses will be supported where it meets 6 criteria as outlined in the policy.
<b>Policy 14</b>	Residential Accommodation for Particular Needs states that the development of residential accommodation for particular needs such as the elderly, special needs and varying needs will be supported where it meets 6 criteria as outlined in the policy.
<b>Policy 15</b>	Student Accommodation states that student accommodation will only be supported where it meets 3 criteria as outlined in the policy.
<b>Policy 16</b>	Houses in multiple occupation states that Houses in Multiple Occupation (HMO) that require planning permission* will be supported where they meet 4 criteria as outlined in the policy
<b>Policy 17</b>	Small Scale Commercial Uses within Residential Areas will be supported where the development of a range of small-scale commercial services and facilities close to and within existing and proposed housing areas.

Table 1: Relevant LDP Policies

The review of the Dundee LDP will identify a LHRL figure for the area, allocating deliverable land in order to meet the 10-year target, and to exceed the MATHLR.

## **Local Place Plans**

The Scottish Government has introduced Local Place Plans (LPPs) through the Planning (Scotland) Act 2019. These aim to encourage communities to play an active role in the planning process for their area, by giving communities the opportunity to submit ideas and proposals that can be taken into consideration while the LDP is being prepared.

LPPs should be community-led and outline proposals for the development and use of land, providing a new opportunity for communities to contribute ideas and proposals into the planning system. This approach can help communities understand what they want to be like in the future and contribute to the development of a positive community identity. A LPP can be submitted at varying scales, from a single place or building or to cover a wider geographic area.

The Design, Quality and Place Topic Paper outlines the requirements for LPPs and their role in the LDP process. An invitation to prepare LPPs was issued to community groups in Spring 2023. In order to feed into the early stages of the preparation of the new LDP, LPPs should be submitted by the end of June 2025.

## **Dundee Local Housing Strategy 2019-2024**

The Housing (Scotland) Act 2001 places a statutory duty on local authorities to prepare a Local Housing Strategy (LHS) supported by an assessment of housing need, demand and affordability. The Local Housing Strategy is the primary strategy for the provision of housing and associated services to address homelessness, meeting housing needs and tackling fuel poverty.

The Dundee LHS aims to deliver a positive housing future for all people in Dundee by ensuring provision of high-quality housing and neighbourhoods where people want to live. This strategy and its action plans have been developed in partnership with other government agencies, Dundee's Health and Social Care Partnership, voluntary organisations and have been subject to consultation with all these organisations, residents within the city and equalities groups. This strategy sets out Dundee City Council's aims and objectives responding to the housing issues that have been identified:

1. Regeneration/New Build
2. Private Rented Sector
3. Climate Change
4. Community Care
5. Community Safety
6. Tackling Poverty

DCC Housing Department are in the process of developing a new Local Housing Strategy which will be published later in 2024. Whilst we cannot reference the revised LHS at this stage, we are liaising with housing on relevant data for inclusion in the Evidence Report and the LHS will inform the Proposed Plan. In preparing the upcoming LHS, we have established partnership working between housing and planning colleagues to ensure that housing delivery and land use planning principles are informed and well-aligned.



## **4. Housing Need & Demand Assessment (HNDA)**

The purpose of the HNDA is to provide an assessment of the total additional housing units needed each year for all tenures of housing. The assessment takes into account local demographic changes, housing market activity, economical changes, and local housing pressures. The main output of the assessment is the estimated housing need over the next 20 years, with a focus on the next 10 years and Local Housing Supply Targets (HSTs) are extrapolated from the HNDA.

The HNDA was published in November 2022 after it had been recognised as robust and credible by Scottish Government's Centre for Housing Market Analysis. The Scottish Government provide an HNDA calculation tool prepopulated with data to estimate the number of new homes needed in the area. The HNDA tool works by projecting the number of new households who will require housing across the Tayside region by considering existing households who need new homes, in addition to new households who will need homes in the next 20 years.

The revised existing housing need figures were derived from the following elements:

1. Homeless households/those in temporary accommodation
2. Households under threat of eviction/repossession
3. Concealed & overcrowded households
4. Those requiring specialist housing
5. Housing Below Tolerable Standard

As housing is a cross-boundary issue, Arneil Johnston were commissioned to deliver a regional HNDA for the Tayside wide region. The HNDA 2023 was the result of significant engagement with stakeholders and provides an evidence-base to inform housing policy decisions as part of the Local Housing Strategy (LHS) and land allocation decisions as part of the preparation of the Local Development Plan (LDP). They are intended to provide long-term estimates that take account of what future housing need might be and inform policy decisions.

The MATHLR figures have been reviewed and refined to reflect the up-to-date HNDA information, using the latest available existing need figures. This has resulted in a revised MATHLR figure for Dundee of 4,300 units over a 10 year period. The MATHLR set out in NPF4 for each authority includes a flexibility allowance to compensate for sites stalling or not delivering as expected - for Dundee the flexibility allowance is 25%.

### **4.1 Dundee Housing Market Area**

A priority for the Tayside Housing Market Partners in producing the HNDA was to commission primary research to provide consistent, current and reliable intelligence on the extent and nature of housing need and demand across the Tayside region. Furthermore,

partners identified major limitations in relying solely on secondary data to produce HNDA Core Outputs and housing estimates.

Headline findings from 2021 HNDA Survey for Dundee City can be summarised as follows:



Figure 1: Headline Figures HNDA

Analysis of the origins of households purchasing residential properties in the Dundee City Housing Market Area reveals that:

- 63% of property purchasers in Dundee come from within the City, therefore Dundee can be regarded as a relatively self-contained Housing Market Area
- 20% of transactions in Dundee City take place from purchasers originating from other Tayside partner areas, most notably Angus (10%), followed by Fife (6%) and Perth & Kinross (4%)
- This inward migration is instrumental in validating the cross boundary Greater Dundee functional market area.

## 4.2 Existing Housing Need

As of June 2024, there were 7755 applicants on the housing register for Dundee City Council and its Common Housing Register partners. The existing social housing stock is as follows:

- 1622 sheltered houses, of which 59 are adapted for wheelchair use
- 278 medium dependency houses (amenity)
- 1748 houses fitted with a community alarm
- 204 houses adapted or built for wheelchair use
- 1719 adapted or built for ambulant disabled

Dundee operates a Common Housing Register where all applicants are held on a single waiting list for all partners in the Register. The partners are Dundee City Council, Hillcrest, Abertay Housing Association and Caledonia Housing Association. Although this does not include all associations operating in Dundee, it does include the largest providers. Table 2 provides an analysis of application by house size – however it is important to note that some households may qualify for more than one house size or type. In addition, the table includes applicants who do not have an assessed housing need according to the Council’s allocation policy but have an aspirational “want” for a house.

Bedrooms	Need	Want
0	552	2
1	3883	20
2	1764	3550
3	1305	802
4	558	443
5	132	142

Table 2: Applications by House Size

There are 21,826 social houses across Dundee with 12,635(58%) provided by Dundee City Council and 9,191 (42%) provided by RSLs. Trends show that around 9% of general needs social houses become available for letting in Dundee each year.

Demand for social housing in Dundee outstrips supply: the Common Housing Register for Dundee has 7755 applicants (6,211 with an assessed housing need) for social housing, and with an average of approximately 1000 annual relets this equates to 7.5 applicants for every Council tenancy that becomes available.

Table 3 illustrates a comparison of our stock with the households on our waiting list reveals that there is particular pressure for one bedroom properties and for larger 4/5 bedroom houses. Approximately 53% of waiting list applicants require a one-bedroom property, however only 32% of council housing stock is one-bedroom. The demand for 3/4/5 bedroom houses is exacerbated by a low turnover of the housing within the stock.

House size	Waiting list applicants	Council Housing Stock	Annual Turnover	% W/L to turnover
1 bed	3,308	3993	429	771%
2 bed	1,540	6437	437	352%
3 bed	1,001	1843	86	1163%
4/5bed	362	362	13	2782%

Table 3: Comparison of Housing Stock and Waiting List

## **Mid-Market Renting**

We have no reliable evidence from the Common Housing Register to indicate the demand for mid-market renting. The HNDA estimates a need for between 135 and 230 units (depending on low/high migration scenarios) over a 20 year period.

## **Homelessness**

Dundee has consistently had around 1400 homeless presentations for the past decade. In 2022/23 there were 1430 new homeless applications made to Dundee City Council, this equates to a 3% increase from the previous year and a 2% increase from the baseline position. However, this needs to be considered in the wider context of increasing levels of homelessness throughout Scotland and unprecedented pressures on housing.

The proportion of households' not containing children is currently at 79% compared to 71% in 2017/2018. This can be attributed to an increase in the number of applications from households without children, and a decrease in the number of households with children as opposed to a large increase or decrease from one cohort.

In terms of demographics, single males continue to be the most common household group and make up approximately half of all applications. The proportion of applications from single females has increased from 21% in 2017/2018 to 25% in 2022/2023. There has been a significant percent change in applications from both 16–17- year olds and applicants over 60 years of age. As the vast majority of presentations from this group are due to being asked to leave or a relationship breakdown with parents, we have made some changes to this pathway for 2022/2023 in recognition of this increase to focus more on prevention and conflict resolution.

There were a total of 1472 cases closed during 2022/2023. For those where there was a duty to rehouse by Dundee City Council, 786 were rehoused into a Scottish Secure Tenancy and 52 in the private rented sector during 2022/2023. As a proportion of all outcomes 76% of applicants where an outcome was recorded secured settled accommodation

Dundee City Rapid Rehousing Transition Plan (RRTP) indicates that 2% of homeless households 2018 and 2019 had a requirement for residential/supported accommodation with future requirements estimated to remain around this rate. There were 757 homeless households who had at least one support need identified with the majority of those requiring support having mental health problems or the need for housing management/independent living assistance. Of those homeless households that require support 16% have medium support needs, 17% require intense wrap around support and 2% require supported accommodation. Dundee has the greatest proportion of homeless households with SMD/Complex support needs across Tayside area.

### 4.3 Projected Housing Need & Demand

The Housing Need and Demand Assessment (HNDA) provides an estimate of growth, between 2021 and 2040 the housing estimates for the Dundee City Area range from: 4660 (using the principal projection) and 6310 (using the high migration projection). By tenure, across the Tayside region it is estimated that:

- 48-58% of housing estimates will be met by social housing
- 11-14% of housing estimates will be met by below market housing
- 12-15% of housing estimates will be met by market rented housing
- 18-23% of housing estimates will be met by market housing

The LHS should consider the need for housing supply targets that extend beyond the duration of the 5-year LHS period by reviewing historic new build completion rates and considering the wider policy and economic context at a regional and local level. Strategic drivers to inform longer term and short-term housing and development planning policy decisions should be developed using HNDA housing estimates as a starting point.

### 4.4 Affordable Housing

Policy 16 (e) of NPF4 states that *“development proposals for new homes will be supported where they make provision for affordable homes to meet an identified need. Proposals for market homes will only be supported where the contribution to the provision of affordable homes on a site will be at least 25% of the total number of homes, unless the LDP sets out locations or circumstances where: (i) a higher contribution is justified by evidence of need, or (ii) a lower contribution is justified for example, by evidence of impact on viability, where proposals are small in scale, or to incentivise particular types of homes that are needed to diversity the supply, such as self-build or wheelchair accessible homes. The contribution is to be provided in accordance with local policy or guidance.”*

The definition of affordable housing in Annex F (page 144) of NPF4 is *“Good quality homes that are affordable to people on low incomes. This can include social rented, mid-market rented, shared-ownership, shared-equity, housing sold at discount (including plots for self-build), self-build plots and low-cost housing without subsidy.”*

The Dundee LDP 2019 (paragraph 6.7) states that *“The Local Development Plan will help to meet the Local Housing Strategy outcomes through improvements to the quality, affordability and choice of housing across tenures and markets. This will be realised through the allocation within the Local Development Plan of a range of housing sites across the City which will support the delivery of a variety of affordable housing types and tenures.”*

The Supplementary Guidance on Developer Contributions sets out that, *“Following an assessment of housing need, demand and affordability, Dundee City Council does not require contributions from developers towards the provision of affordable housing”*.

The Council does not have any other local policy or guidance setting out how affordable housing contributions should be provided. Policy 16 (e) of NPF4 requires housing applications to provide a 25% affordable housing contribution, except where a higher or lower contribution is set out in the LDP. In Dundee, the LDP 2019 and the Supplementary Guidance state that there is no requirement for an affordable housing contribution.

The delivery of affordable housing within the City has been realised through continued partnership working with the Scottish Government, affordable housing providers and developers by guiding the managed release of surplus Council owned land through the Council’s programme of land disposal. The development of housing has been further supported through the LDP strategy and allocation of a range of housing sites across the City which has supported the delivery of a variety of affordable housing types and tenures.

The majority of affordable housing provision within the city is delivered via the Social Housing Investment Plan (SHIP) through the Council and local housing associations. The previous Local Housing Strategy set a challenging target of completing 200 social housing units per annum.

As has been established in the HNDA, there is still a significant need for additional social rented housing and other affordable tenures. From 2023/24 the amount of affordable housing grant available through Scottish Government’s Affordable Housing Supply Programme (AHSP) was reduced by almost 25%. As this is a recent reduction in grant funding, the impact on affordable housing delivery has now yet been evidenced in a reduction in completions. However, should this trend of reduced grant funding continue then the implications of this will need to be given consideration as part of the review of the LDP, LHS and the delivery of the SHIP.

## **4.5 Specialist Need Housing**

The HNDA revealed that 47% of households in Dundee have someone who is long-term sick or disabled. The most common long-term sickness or disabilities are physical health problems (24.7%), mental ill health (22.5%) and learning disabilities (7%). This benchmark is lower than the Scottish House Condition Survey (SHCS) (2017-19) which estimates that 54% of households in Dundee have a household member with a long-term illness or disability. The SHCS also estimates that 46% of households in owner-occupation contain one or more long-term sick or disabled person in comparison to 73% of those living in social housing.

In addition, 9% of households with long term illness of disability in Dundee are limited by their current property, which is the highest of all Tayside partners. The concentration of flatted accommodation in Dundee aligned to a poorer health and mobility profile are likely to be driving factors in this statistic. Furthermore, 16% of older households contain an

individual with a long-term sickness or disability restricted by the property, which is 6% points greater than found across Scotland as a whole.

It is estimated that there are 7,085 units of specialist housing provided by social landlords in Tayside, with 15% of all homes offering specialist forms of housing provision. Dundee accounts for a significant 56% of provision across Tayside, with 3,969 specialist homes in the social housing sector.

In Dundee, 63% of specialist homes provide housing for older people including sheltered accommodation and 41% of specialist homes provide accessible housing for people with mobility needs. Across all Tayside partner areas, there has been an 8% turnover in specialist housing stock over the last three years comparatively Dundee had 10% turnover over the same period.

Dundee has 666 units of accessible housing, which accounts for 3% of the total housing stock in the city. Across Tayside partners, Dundee accounts for 42% of all accessible housing provision and 5% of lets within the year 2019-20 were for accessible housing with around 108 accessible homes becoming available to let each year.

The HNDA reveals that households in Dundee reported the most significant percentage of unmet need for accessible housing at 13%, significantly higher than the average for Tayside at 8.1%. Over 9000 households express an unmet need for accessible housing in Dundee.

It is important that targets for future adaptation requirements are kept under continuous review to take account of demographic changes, i.e. Dundee's ageing population. The provision will be determined through the review of the LHS and in some instances where adaptation is not possible, there may be a need to identify alternative suitable housing options for such households.

SHCS data suggests that 33% of the housing stock in Dundee has been adapted which equates to approximately 71,000 homes. Scottish Government Housing Statistics also show that 48 properties have benefited from grants since 2014 through Dundee City Council Scheme of Assistance.

The Tayside HNDA (2021) indicates that 30% of households across the Tayside partner areas have property adaptations. This figure is likely to be more representative of the current requirement for adapted housing given the level of statistical confidence achieved in each housing tenure. In Dundee, unmet need for housing adaptations is expressed by 25% of households across the City which is significantly higher than the proportion across Tayside at 16%.

There are 271 units of wheelchair housing in Dundee. The proportion of wheelchair accessible housing in Dundee makes up 1% of all social housing in the City. This is equal to the proportion of wheelchair homes across Tayside (1%). Dundee has the most significant proportion of wheelchair housing in the Tayside area at 66% of all wheelchair homes. The main provider of wheelchair housing is Dundee City Council (55.7%) followed by Hillcrest (15.5%) and Blackwood (13.3%) Housing Associations.

Lastly, 2.2% of survey respondents who said they had a specialist housing need indicated that they had an unmet need for wheelchair accessible accommodation in Dundee. This is slightly higher than the rate for Tayside at 1.7%.

#### 4.5.1 Older People and Disabled People Housing Needs

The Local Housing Strategy has historically had a strong focus on delivery of housing to meet particular needs. Working closely with the Health and Social Care Partnership, the delivery of particular needs housing are met through the Strategic Housing Investment Plan by working with each strategic planning group to commission services as part of the annual planning cycle.

Table 4 demonstrates that in Dundee there is a large demand for wheelchair adapted housing, and the requirements are considered in every new build social rented development. The size of housing required varies from one bed units to 5 bed units, with 84 people on the waiting list as at June 2024.

	1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom
Mainstream accommodation	21	31	7	4	0
Sheltered accommodation	18	3	0	0	0

Table 4: Wait List Demand for Wheelchair Housing

Since 2015 there has been 45 new build social rented wheelchair units either completed or currently under construction in the City, there are also a further 137 proposed wheelchair units for future developments identified in the SHIP 2019 - 24. SHIP Commissioning Targets 2019-2023 equal 10 wheelchair accessible units per annum.

In 2017, Dundee City had 44 registered places in care homes for older people per 1000 population, which represents an increase of 2.5 places per 1000 population since 2007. Furthermore, there were 34 care homes in Dundee City in 2017 which represents a 3% reduction between 2007 and 2017. Dundee City had 1,098 residents in care homes in 2017, representing an 8% increase from 2007. At this time care home occupancy rates were 87%.

There are 2,953 units of housing for older people in Dundee, 15% of the total social housing stock and 74% of all specialist housing in the Tayside area. In Dundee, there are 885 waiting list applications for housing for older people amounting to 12% of all applications. This equates to 3.19 applications for every available tenancy.

There are 79 supported tenancies provided by social housing providers across Dundee, which account for 0.4% of the total housing stock in the area. There are 296 waiting list applications for supported housing.

In addition to this, there are 211 units of supported housing in Dundee City (Health and Social Care Partnership (HSCP) commissioned tenancies) all of which are for households



with learning disabilities. In the absence of data on future need for accommodation with support, Dundee City Council estimate there is a further requirement for 211 HSCP commissioned tenancies. Defining supported accommodation needs for all client groups in Dundee is a priority for the HSCP.

#### **4.5.2 Gypsy/Traveller Housing Needs**

The HNDA should set out current need and demand for the provision of sites and pitches for both gypsy/travellers. Gypsy/travellers are recognised as a distinct ethnic group by the Scottish Government. There is a large body of evidence, both in Scotland and in the UK, which shows a lack of access to culturally appropriate housing which is a major contributory factor in poor health, education and societal outcomes experienced by this demographic.

There are estimated to be 15,000- 20,000 gypsy/travellers in Scotland. They are a group protected by equalities legislation, but the community continues to be among the most disenfranchised and discriminated against in Scotland. They have significantly poorer health than any other ethnic group and health is one of the key areas in which the community faces inequalities.

As set out in Greater Dundee HNDA (2023), Tayside partners commissioned a research study into the 'Accommodation Needs of Gypsy/Travellers and Travelling Showpeople in the TAYplan area'. This study offers the most recent estimates of accommodation/site requirements for Gypsy/Travellers across the Dundee City area.

Key findings from the 2016-2021 study for the Dundee City area are as follows:

- Dundee City Council provides a purpose built caravan park for use by gypsies/travelling people. It is located in a rural setting at Balmuir Wood, Tealing about 6 miles from Dundee just off the A90, towards Forfar. The study showed that 60% (125) of the Gypsy/Travellers in Dundee were residing in settled accommodation.
- 47% of council sites for Gypsy/Travellers in Dundee were occupied with 17 households leaving on average annually
- Dundee has the highest rate of turnover in site pitches of all Tayside areas with an average of 89% of households living on the site vacating each year
- There was projected to be a 55 to 65 surplus in Gypsy/Traveller site pitches across the next 5 years as identified in the HNDA study.

The Dundee City Local Housing Strategy 2019-2024 sets out a number of ongoing improvement actions associated with Gypsy Traveller site provision in Balmuir Wood site.

### 4.5.3 People in Higher or Further Education

The Scottish Household Survey 2020 indicates that there were 5,013 full-time students aged 18-74 in employment in Dundee, with 1,710 unemployed. There are a higher proportion of full-time students living in the private rented sector than any other housing tenure.

The adopted Dundee Local Development Plan 2019 sets out (in Policy 15: Student Accommodation) that over the past ten years there was comprehensive development of new and replacement purpose-built student accommodation (PBSA) within the City, and that it is considered unlikely that there will be the need over the short to medium term for any significant additions to the supply of purpose-built accommodation for students. In recent years there has been an increase in developer interest for purpose-built student accommodation and this has resulted in the approval of a number of planning applications within the city centre and circa 1,600 student flats have been approved. A number of PBSA units have commenced in the City and Table 5 provides a current analysis of PBSA in Dundee, demonstrating that a significant development pipeline has been established, with a number of bedrooms under construction, approved or pending decision.

Status	Total
Under Construction	563
Approved	1662
Live Planning Application	367
Proposal of Application Notice	800
Pre-application submitted	894

Table 5: Analysis of PBSA (July 2024)

### 4.6 Strategic Housing Investment Programme (SHIP)

The Strategic Housing Investment Plan (SHIP) is the key statement on affordable housing development priorities within Dundee. The SHIP is a rolling plan/programme covering a period of five years. It is linked to the Local Housing Strategy (LHS), identifying the affordable housing investment priorities outlined in the strategy. The current SHIP covers the period 2019-24. The SHIP target for particular needs housing is up to 30% of the total number of units commissioned.

The SHIP is embedded in Dundee's Community Partnership Planning Framework and reflects the affordable housing priorities within the city's eight Local Community Planning Partnership areas and multi member ward boundaries.

## 5. Housing Stock Profile

The Greater [Dundee Housing Need and Demand Assessment](#) (HNDA) is an evidence base for the formation of Local Housing Strategies and Local Development Plans (LDP). As a minimum requirement, HNDA should aim to address the following key areas of housing policy and planning:

- **Housing Supply Target(s) (HSTs):** to inform the setting of a HST and to inform the LHS and LDP. The HST sets out the extent and nature of housing to be delivered over the period of the plan(s)
- **Stock management:** to assist understanding of the current and future demand for housing by size, type, tenure, and location in order to optimise the provision, management, and use of housing stock. This in turn informs policy making regarding need of future stock
- **Housing investment:** to inform future housing investment and funding, for example through Strategic Housing Investment Plans (SHIPs)
- **Specialist Provision:** to inform the provision and use of specialist housing and housing related services to enable independent living for all, as expressed in policy in the LHS and to inform spatial strategy allocations e.g., land for Gypsy/Travellers
- **Geographic distribution of land:** to inform the spatial allocation of land through the Local Development Plan for new housing at local authority level.

### 5.1 Tenure Profile

Based on the HNDA Survey, 50% of households in the Dundee area own their property, which is the lowest proportion among all Tayside partners. This is consistent with other data sources such as the 2011 census (50%), 2019 Scottish Government Housing Statistics (45%), and the 2017-19 Scottish House Condition Survey (46%). Compared to the Scottish average, Dundee has a higher percentage of private renting at 15% (survey) versus around 12% for Scotland. The survey also shows that Dundee has the highest proportion of householders renting social housing compared to any other partner area, at 33%.

### 5.2 Stock by Dwelling Size

The HNDA survey demonstrates that in Dundee, 46% of dwellings are flats/tenements, which is the highest proportion among all Tayside partners. Houses/bungalows make up just over half (53%) of dwelling types in the area. Additionally, the survey highlights that 2 and 3 bedroom properties account for 75% of all dwellings in Dundee.

Dundee has approximately 17,000 social housing properties, with 55% being flats and 23% being houses. Furthermore, 80% of social housing properties in Dundee have 2 bedrooms or fewer. In terms of the private rented sector (PRS), Dundee City holds 45% of the total PRS properties across the Tayside partner areas, with 15,531 properties out of a total of 34,331.

The number of registered HMO's in Dundee is the highest among the Tayside partner areas, at 1,434, with 60% of them having between 3 and 4 occupants. Additionally, Dundee City is the most densely populated Tayside partner area, with 25.84 dwellings per hectare.

According to Scottish Government Statistics, in 2017, 55% of dwellings in Dundee had up to 3 rooms, with (45%) offering 4+ rooms per dwelling. This dwelling size profile has remained static since 2007 and echoes with Census outcomes in 2001. The 2021 survey results indicate that across Dundee, 54% of homes offer 1-2 bedrooms, with 44% offering 3-4 bedrooms. The 2021 survey results indicate that this bedroom size profile varies significantly by housing tenure with the owner-occupied sector offering a greater proportion of larger homes. In the owner-occupied sector, 47% offer 1-2 bedrooms, with the majority (53%) offering 3+ bedrooms.

In contrast in the social housing sector, a significantly higher proportion of homes have 1-2 bedrooms (82%) with fewer 4+ bedroom dwellings (3%). Whilst 45% of homes across Dundee offer 4+ bedrooms, the house size profile in the social housing sector will restrict the available housing options of larger household types. The growing population of smaller and single person households across Dundee also raises questions over a growing mismatch of households to homes by property size. According to the HNDA survey, 53% of all dwellings are houses across Dundee, with 46% flats. The Scottish Household Survey 2019 indicates that there is a much higher proportion of houses in the owner-occupied sector (80%) than flats (20%).

There are more flats (68%) than houses (32%) in the social housing sector which is similar to private rented sector, where there are 87% flats and 13% houses. There are 1,434 registered HMOs in Dundee, the majority (464) have three occupants.

As of 31st March 2023, there were a total of 15,434 houses in multiple occupation licences in force in Scotland. Of the licences in force, 93% are accounted for by just six local authorities – Aberdeen City, Dundee City, City of Edinburgh, Fife, Glasgow City, and Stirling – all of which have cities in.

### **5.3 House Condition**

The HNDA notes that 1% of dwellings in Dundee are considered to be Below the Tolerable Standard based on the SHCS. The survey notes that over one third (35%) of dwellings in Dundee are in urgent disrepair and almost half (48%) of pre-1945 dwellings have evidence of urgent disrepair, the highest proportion of all Tayside partners. Almost 9 in 10 (88%) of Dundee's dwelling have evidence of disrepair, the highest of all Tayside partners and 17% higher than the Scottish average (71%). Dwellings with evidence of condensation in Dundee (16%) is double the rate of the Scottish average (8%). The Scottish Housing Regulator, however, taking into account abeyances and exemptions and a detailed inspection regime, records 99% of social rented stock in Dundee as meeting the SHQS.

## 5.4 Empty Homes

The Strategic Empty Homes Framework has been informed by a clear understanding of the extent and nature of empty homes across Dundee City Council and their impact on neighbourhoods, communities, homeowners and local residents. To achieve this, an evidence-base has been developed by the Council detailing the number and types of empty homes across the City, as well as important contextual information on tenure estimates, unmet housing need, the incidence of homelessness, the role of the private rented sector and housing condition and quality issues.

This evidence-base provides a strong understanding of the scale of empty homes as well as the challenges faced in bringing them back into use. This analysis is crucial to informing decisions on how partnerships, investment and innovation should guide empty homes activity and interventions.

The table below details the scale of ineffective housing stock within the City and provides a helpful measure of the number of homes which are not in use and are not contributing to meeting housing needs on a permanent basis.

Ineffective Housing Stock	Dundee City Council
Total Dwellings	75,839
Long-term Empty Dwellings	1,067
Dwellings with Unoccupied Exemptions	1,671

*Table 6: Ineffective Housing Stock*

*Source: DCC Empty Homes Officer (Private Sector Services Unit)*

The table shows that empty homes, both ‘long-term empty dwellings’ and ‘dwellings with unoccupied exemptions’, account for 3.6% of all dwellings in Dundee City Council. Table 7 sets out how levels of long-term empty and unoccupied dwellings within Dundee City Council compare with levels in Scotland as a whole.

Geography	% of dwellings long term empty (all)	% of dwellings long term empty (12 months+)	% of dwellings unoccupied exempt	% of Scottish Housing Stock	% of Scottish vacant housing stock
Dundee City Council	1.4% (1,067)	0.6% (485)	2.2% (1,671)	2.81%	2.31%
Scotland	1.7% (46,217)	1.05% (28,280)	1.75% * (47,293)		

*Table 7: Empty Dwellings National Comparison*

*Source: DCC Empty Homes Officer (Private Sector Services Unit)*

## 5.5 Buy Backs

The Open Market Acquisition Scheme allows for the purchase of properties in sizes and types that there is currently the greatest unmet need for within the city’s social housing supply. The introduction of the strategy would complement the existing new build Council

housing programme and the previously outlined activities within the Strategic Housing Investment Plan (SHIP) for the local social housing sector.

## **5.6 Demolitions**

The HNDA referred to 128 programmed demolitions and these have subsequently been demolished. There are currently no known occupied houses scheduled for demolition which would require an additional allowance to be added to the housing supply target, to avoid replacement houses being counted as additional units when measuring progress towards meeting the main housing supply target.

## 6. Housing Completions

### 6.1 Completions by Tenure

A review of Dundee City completions between 2013 – 2023 demonstrates an average build rate of 314 units per year. This is similar to the build rate between 2009 – 2019 reported in NPF4 which formed the basis for the MATHLR figure.

The annual audit of housing land provides a factual statement of land supply within the administrative boundaries of Dundee City Council as at 31 March on each audit year. The audit identifies that there is an effective supply of land for housing across the City.

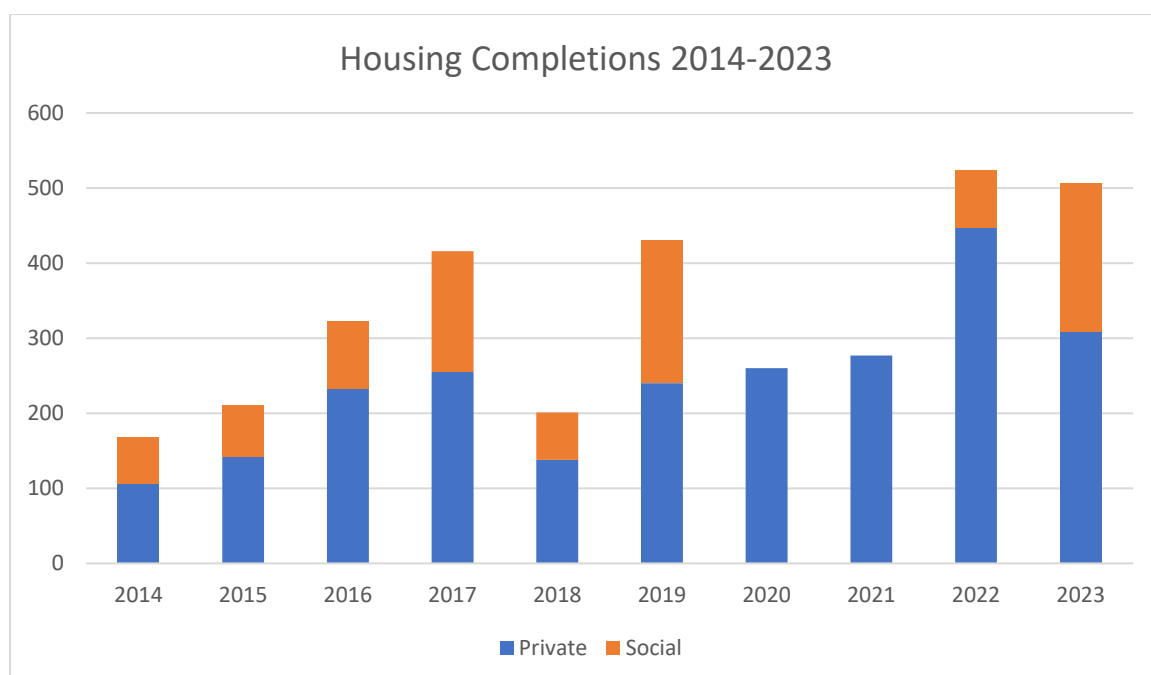


Figure 2: 10 Year Completions Analysis  
Source: HLA (2023)

The ten-year trend in Figure 2 demonstrates that historically, private completions are being delivered at a higher rate in the City than social completions. A look forward to the projections of HLA 2023 demonstrates that this trend is set to continue with private completions projected to continue to exceed social completions.

Tenure	Completions	% of total supply
<b>Private</b>	2298	58%
<b>Affordable</b>	948	24%
<b>Mixed/TBC</b>	743	18%

Table 8: 10 Year Tenure Split Projections  
Source: HLA 2023

## 6.2 Small Sites & Windfall Sites

Housing development sites of 4 or less residential units on land that has not been allocated for housing are known as small sites. These sites are recorded separately within the Dundee HLA and so are in addition to windfall completions. It is clear from analysing completion rates that small sites make a consistent contribution to the supply of new housing within Dundee. An analysis of historical HLA data evidence that small sites have provided capacity for over 90 units in the past 10 years.

Windfall sites are those which become available for development unexpectedly during the life of the local development plan, and so are not identified individually in the Plan. The urban nature and the ongoing regeneration within the city has resulted in windfall sites making a sizeable contribution to the supply of land for new housing in Dundee.

Year	Completions on Windfall Sites	Total Completions
2014	168	168
2015	173	210
2016	130	323
2017	169	416
2018	97	201
2019	217	430
2020	209	260
2021	248	277
2022	405	524
2023	375	506

*Table 9: Historic Completions*  
*Source: Uniform*

Table 9 demonstrates that windfall sites have consistently been delivered in the City. The development of these sites has been consistent with the current spatial strategy of the LDP. The re-use of brownfield sites has been promoted through Policy 9 of our current LDP, providing proposals meet the requirements set out in Appendix 3 and it can be demonstrated that it will improve the tenure mix in an area where existing choice is limited, and would make a positive contribution to the regeneration objectives of the area. This has allowed the planning authority to be responsive to housing developments coming forward in the right locations and supporting sustainable development.

## 6.3 Self-build

The Town and Country Planning (Scotland) Act 1997 (Section 16E) requires planning authorities to prepare and maintain a list of people interested in acquiring land in the authority's area for self-build housing, and to publish that information. DCC host an online form of parties interested in self-build housing in Dundee to support this potential housing delivery model. The list is hosted on the Council's [Local Development Plan webpage](#) and is published quarterly to establish if demand for self- build exists in the local area.



In addition, as part of the annual Housing Land Audit, completions on small sites (of less than 4 units) are recorded and it is reasonable to consider that these units are likely to fall into self or custom build categories.

## **6.4 Short-term Lets**

From 1st October 2022, the Scottish Government introduced legislation covering the letting of accommodation and new requirements for accommodation to be licensed by the local authority. For those who wish to offer accommodation on a short-term let basis, this legislation means they cannot trade without a licence. Once approved, a licence is valid for 3 years.

Licences are required for:

- those who wish to let a property where they don't usually reside (i.e. a second home),
- let their all or part of their home while they are absent (i.e. on holiday)
- use part of their home on a short term let (i.e. home sharing)

Since legislation came into force, Dundee has received 31 planning applications and 224 licensing applications for short-term lets (STL). We anticipate an increase in STL applications as applicants become aware of the requirement for planning permission. A GIS-system is being maintained with details of all applications. No significant or city-wide issues are evident in Dundee and there is no intention to focus resources on designating a control area at this time. It is, however, our intention to monitor impact of STLs on an individual basis, and if the need arises in the future, a STL Control Area can be established.

## 7. Household and Population Projections

### Household Projections

The HNDA captures contextual information on the operation of the housing system to develop policies on new housing supply, the management of existing stock and the provision of housing related services. It uses National Records of Scotland (NRS) data from 2018 to estimate the housing need and demand for Dundee from 2021-2041. The output over the projected period is for total number of new households ranging from 2450 – 4060. The housing estimates are projected against two scenarios: principal projection and high migration over 5-year periods.

Informed by demographic analysis presented in Core Output 1 (Housing Market Drivers), the Dundee City area has shown positive household growth in the last decade, albeit at half the rate of the wider Tayside region (2.5% between 2008 and 2018). Given the ambitious economic growth strategy within the Tayside City region but in Dundee City specifically, partners felt that an ongoing growth projection could be justified as a reasonable scenario with the HNDA calculation.

On this basis, partners opted to create two scenarios: one using the NRS principal household projection for the Dundee City area and one using the NRS High Migration scenario.

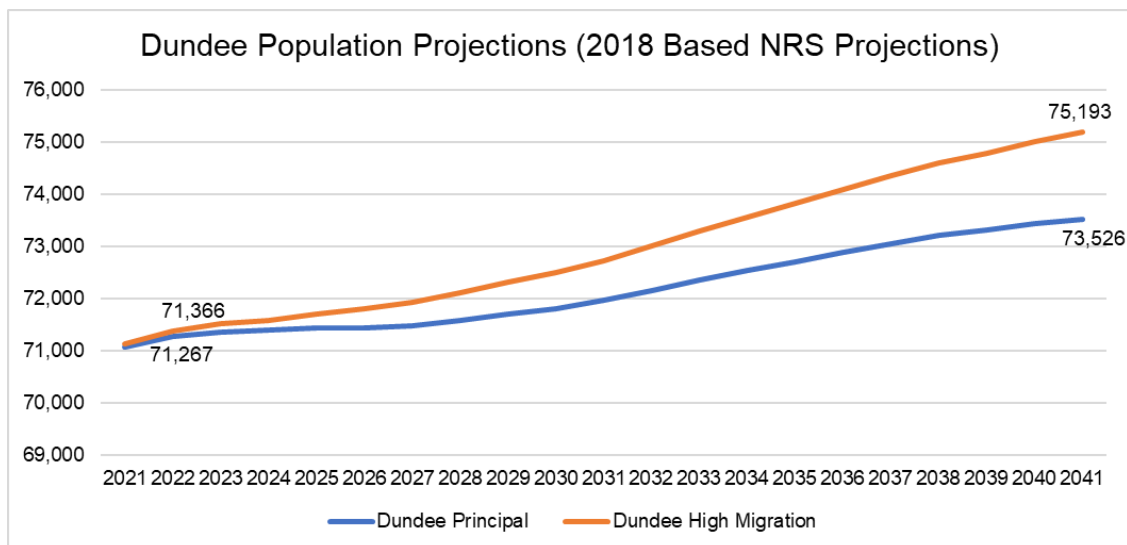


Figure 2: Dundee Household Projections  
Source: National Records for Scotland

The outcomes of household projection scenarios create an estimate of new households emerging in the Dundee region over the next 20 years of between 2,449 using the principal household projections and 4,060 using the high migration/growth scenario.

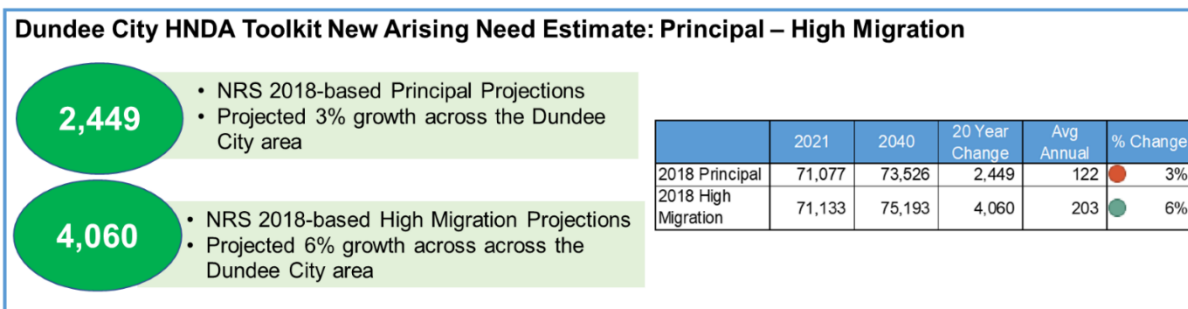


Figure 3: Migration Scenarios  
Source : HNDA 2023

The principal household projections estimate an overall growth in households across the Dundee City region of 3%. These projections create an average annual increase of 122 households in Dundee. The high migration/growth scenario estimates an overall growth in households across Dundee of 6%. These projections create an average annual increase of 203 households across the City.

There has been a 2.5% increase in the number of households between 2008-2018 in Dundee which is the smallest change in the Tayside area. Dundee is expected to have a 4% increase in the number of households between 2021 and 2043, which could stretch to 6% if there is high migration. The HNDA Survey revealed that Dundee had the highest percentage of people with a desire to move (47%) and the lowest percentage (77%) of respondents who wanted to move within Dundee. Furthermore, 2018-based household projections suggest that Dundee’s household numbers will increase slightly between 2018 and 2028 from 70,337 to 71,581.

### Population Projections

Dundee has experienced minimal population growth at 2% between 2000-2019. In terms of population projections, the population in Dundee is projected to change by less than 1% across the period 2018-43.

In 2018/19 Dundee City experienced the highest % of overseas in migration (113%) and within Scotland out migration (-38%). Like all other Tayside areas, Dundee’s younger and working age population is expected to decrease between 2018 and 2038 and the 65+ older people age group is expected to increase (17%) although this increase is the lowest amongst Tayside partners.

## 8. Housing Land Supply

The annual audit of housing land provides a factual statement of land supply within the administrative boundaries of Dundee City at 31<sup>st</sup> March 2023. The audit identifies that there is an effective supply of land for housing across the City.

HLA 2023 indicates that Dundee has the capacity to deliver an estimated 4408 units city-wide on a range of brownfield and greenfield sites. Of this figure, 3998 are programmed as deliverable and a number of sites have been categorised as constrained and do not contribute towards the housing supply at this time.

Figure 4 illustrates how the housing supply has been programmed, with the majority of units projected to be deliverable in the period 2024-2033. DCC aim to adopt LDP3 by 2028 and analysis of HLA 2023 indicates that 1906 units are programmed to be delivered prior to the adoption of LDP3 – leaving a deliverable supply of 2092 units to be carried forward into the Plan.

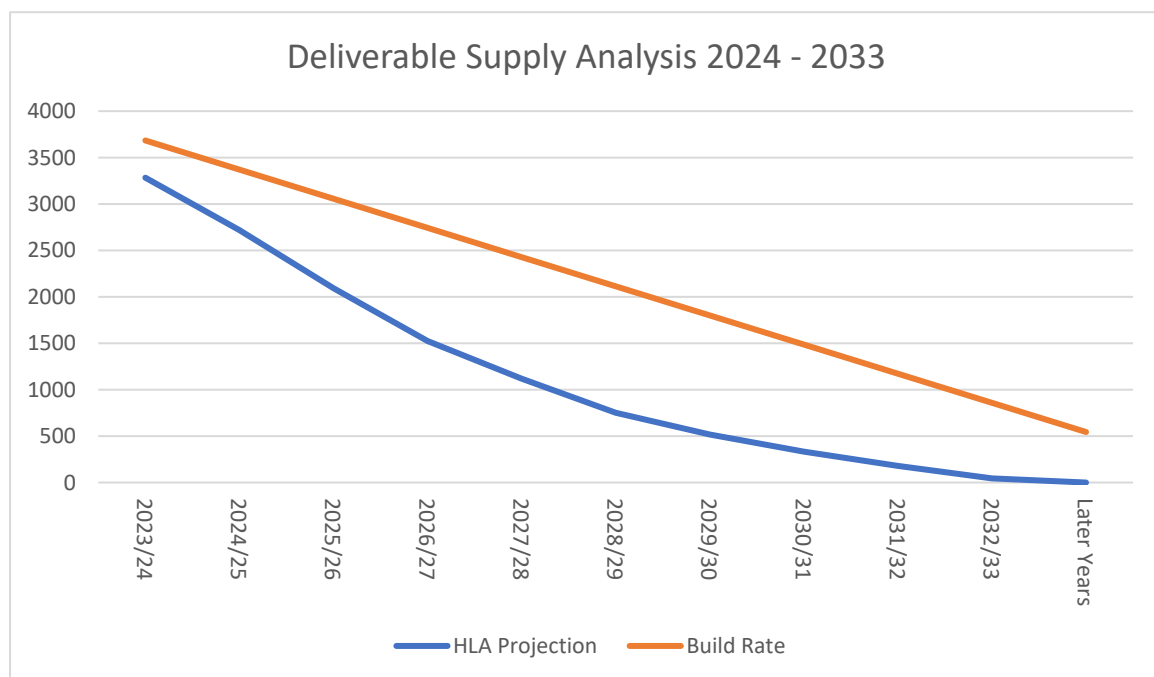


Figure 4: Supply Scenario Comparison HLA 2023 based.

A range of market pressures are anticipated to slow the build rate and so a conservative and proven build rate is of relevance when assessing our Housing Land Supply. This would result in an increase in the support of deliverable housing sites being brought forward into LDP3. Additionally, the LDP review will trigger an assessment of allocated sites and may lead to the removal of inefficient sites, impacting housing supply.

## 9. Local Housing Land Requirement

A key role for LDPs is to identify a Local Housing Land Requirement (LHLR) with a transparent and understandable explanation of how the figure has been calculated. NPF4 states that the LHLR figure must exceed the 10-year Minimum All Tenure Housing Land Requirement (MATHLR). The planning authority's views on the matters listed under Section 15(5) of the Act are expected to inform the LHLR which will provide a target for meeting housing needs of people living in the area as required by Section 15(1A). The indicative figure will be informed by MATHLR, HNDA, HLAs, self-build, windfall assumptions and LHS. This chapter will discuss the range of factors that will influence the LHLR and will provide an evidence-base to establish what an appropriate uplift from the MATHLR would be for Dundee.

### 9.1 MATHLR

NPF4 Annex E provides a 10-year MATHLR for each planning authority area. Planning authorities must take this into account in arriving at their indicative LHLR. It is expected that the MATHLR is the minimum amount of land for housing to be included within LDPs, and that the LHLR will exceed the MATHLR.

The methodology for the MATHLR is set out in the Scottish Government [Housing Land Requirement: Explanatory Report](#) and Dundee's MATHLR figure is set out below:

Existing Housing Need (A)	Newly Forming Households (B)	Total (A+B = C)	Flexibility Allowance (D)	Flexibility Allowance Calculation (C x D) = E	MATHLR (C + E)
2250	1200	3350	0.25	863	4300*

Table 10: Dundee's MATHLR Calculation

The Minimum All-Tenure Housing Land Requirement (MATHLR) is contained within Annex E of National Planning Framework NPF4. In finalising the MATHLRs, the Scottish Government have continued to use an evidence-based approach to refine the figures. For those instances where a local authority has completed a new Housing Need and Demand Assessment (HNDA) since Draft NPF4 was published, where applicable, information from this has been used to update existing need inputs.

An analysis of Dundee's build rate over the last ten years demonstrates an average annual build rate of 314 units per year. Based on this, it is not rational to propose a significant uplift on the MATHLR figure as this will not necessarily result in higher build rates. As identified in [section 9.5](#) a host of challenges and constraints still exist for developers, and these must be managed to bring sites forward within the plan period.

The MATHLR has a robust evidence base and combines past development rates with future projections in line with local policy ambitions. However, the LDP Guidance states that where more recent evidence is available this should be used to inform the Evidence Report.

The Dundee Housing Need and Demand Assessment 2023 has been signed off by the Scottish Government Centre for Housing Market Analysis as being “robust and credible”. The NPF4 figure for Dundee of 4300 covers a 10-year period. The HNDA covers a 20-year period, so a figure of 8600 can be assumed to cover this period. This figure reflects levels of house completions in Dundee which have averaged 433 units over the last 5 years. If we can continue to deliver at this rate, this would result in the delivery of 8660 homes over a 20-year period. For comparison purposes, in the Dundee Local Development Plan 2019, the Council identified a housing land requirement of 5280 units for a 10-year period and this provides a sensitivity check on the MATHLR figure.

## 9.2 Updated Projections

The population projections for MATHLR and HNDA are based on 2018 data. No local authority (sub-national) projections were created using 2020 data. The next sub-national population projections based on 2022 data are not expected until early 2025, and household projections are expected mid-year 2025. We will review these projections when they become available.

## 9.3 Indicative Local Housing Land Requirement

There is a requirement for the Council to settle on an indicative LHLR figure for presenting the Evidence Report the Gate Check stage. Acknowledging that there is an expectation that the figure should exceed the MATHLR, whilst ensuring that the level of delivery is achievable within the plan period and consider the various market factors that might influence build rates. The MATHLR for Dundee is set at 4300 for the Dundee Area, and we would suggest that an uplift of 430 units (10%) would be justified based on the evidence presented in this paper.

	LHLR (10 years)	Estimate of existing and deliverable supply	Difference between MATHLR and estimate of existing supply	Windfall	Potential additional land required (units)
MATHLR	4300	3500	800	750	50
MATHLR + 5%	4515	3500	1015	750	265
MATHLR + 10%	4730	3500	1230	750	480

Table 11: MATHLR Scenarios

As demonstrated, and based on historic trends it is anticipated that a large proportion of the LHLR is expected to be met through existing supply carried forward into the next LDP. The current HLA estimates an effective deliverable supply of almost 4000 units, and these have been programmed over 10 years.

An analysis of Dundee's effective supply since the adoption of LDP2 (2019) demonstrated an 11% decrease in the our supply averaged from 2019 – 2023. We have therefore applied an 11% decrease to the 2023 figure over the same time period to arrive at our estimate of existing and deliverable supply figure of 3500 (see calculation in [Appendix 2](#)).

Dundee has historically demonstrated a high contribution of windfall completions (see [Section 6.2](#)) and we have therefore included a modest allocation of 750 units over the 10-year period to take account of this. We also acknowledge the contribution that small sites and constrained sites that may come forward in the plan period, but these are not included within the calculation.

The site assessment process will prompt the review of existing HLA sites, and non-contributing sites and this will provide an updated evidence-base for inclusion in Evidence Report. Table 11 shows how each scenario would impact upon the allocation of additional land which might be required over the plan period.

It is suggested that a 10% increase in the LHLR (Local Housing Land Requirement) for Dundee would be a challenging yet attainable target. Achieving this increase would involve reviewing the capacity of both existing and new brownfield and greenfield sites, without the need for releasing significant additional greenfield land. Going beyond this 10% increase would be unfeasible based on historical completions, and would likely necessitate significant new land allocations, potentially requiring substantial release of greenfield land, which goes against NPF4's principles concerning 20-minute neighbourhoods and urban growth.

## **9.4 Consideration Of Additional Need**

Dundee HNDA housing estimates range from 4,699 to 6,310 over the next 20 years. The high migration/growth scenario projects a 40% increase in estimated need from the principal scenario. This results in an additional net housing requirement of 81 homes per annum. As stated above, the MATHLR figure for Dundee is 4,300 units over a period of 10 years.

Homes for Scotland have commissioned a Scotland-wide study (the Diffley Report) on housing need – the approach adopted takes a broader definition of housing need and the survey suggests that 38% of Scottish households have some form of housing need.

For Dundee, the Diffley Report estimates a form of need in 35% of households which equates to a gross current housing need of 25,400 households. However, as demonstrated in Table 12 below, the net housing need is estimated significantly lower at 10,900.

HNDA Step		%	Approx. No. of Households
x	Gross Current Housing Need		25,400
y	In Situ Solutions Most Suitable		7,300
z	% and Number Able To Buy in Market	40% (x-y)	7,200
A	Net Current Housing Need (Backlog)		10,900

Table 12: Estimate of Net Current Housing Need  
Source: Diffley Report (2024)

The Diffley Report is not an HNDA and takes a much broader definition of housing need than the approach of the Greater Dundee HNDA, including hidden households not facing overcrowding and those struggling to afford their home. As referenced in [Section 4](#) the HNDA underwent significant engagement and consultation with stakeholders and was deemed robust and credible by the Scottish Government’s CHMA. The HNDA also informed the MATHLR calculation and is our primary evidence in considering housing need.

### Home Ownership

Dundee had the smallest increase in the volume of house sales between 2008 and 2020 at 7.4%. The median house sales value in Dundee (£145,942) was the lowest of all Tayside areas. In Dundee, 45% of households cannot afford a lower quartile market home. Households would need to spend 4.53 times the average local income to afford the average house price – a factor in excess of the typical 3.9 multiplier.

The average house price in Dundee was £137,000 in March 2024 (provisional), similar to the revised figure for March 2023. Across Scotland, the average house price rose by 6.7% over the same period last year. The average house price in Scotland rose by the same percentage (6.7%) to £192,000.

### Affordability

The HNDA Survey data estimates that 17% of households in the Dundee area are spending more than 30% of their income on rent/mortgage costs. RSL rents are on average 24% higher than local authority rents with a monthly average of £420 compared to £339. 30% of households cannot afford an RSL rent without subsidy based on a 30% income to rent ratio.

The Covid-19 pandemic has seen housing affordability levels diminish across Dundee, with three times more people stating they are experiencing serious financial difficulties post pandemic. Housing solutions for lower income households need careful consideration as most options, even at entry level, are unaffordable.



## **9.5 Strategic Capacity Considerations**

In order to present a robust LHLR, we must consider a range of factors that will impact the capacity of the City to accommodate new housing allocations and the delivery of sustainable places.

### **9.5.1 Environmental Considerations**

In all localities, there are a range of physical constraints that exist and limit growth, as well as environmental considerations. Dundee is one of the most constrained Local Authority areas in Scotland due to its tight administrative boundary. Dundee City Council has a long-sustained history of achieving significant amounts of development on previously developed (brownfield) land. Brownfield land is generally more sustainable but does raise issues such as a need for contaminated land treatment in some cases. Dundee's administrative boundaries are such that there exists relatively little quantities of greenfield land and development of such land must therefore be strictly controlled. As the quantity of land being developed increases this can give rise to other effects such as additional flood risk and pollution through increased transportation requirements.

Six water courses run through Dundee some of which are subject to localised flooding. The Flood Plain mainly affects residential and other property at Broughty Ferry, along the River Dighty and at the Central Waterfront. Sustainable Urban Drainage Systems are now a standard feature of new development. There are no major strategic issues with regard to water infrastructure available now or in the foreseeable future.

The entire Dundee City Council administrative area was designated as an Air Quality Management Area in July 2006 and redefined in October 2010. The area was designated in relation to breaches and likely breaches of the Nitrogen Dioxide annual mean Particulate Matter air quality objective in the vicinity of 24 several main junctions within the City.

The City's network of existing open space has been protected, developed and enhanced by targeted improvements. An updated Open Space Audit and Open Space Strategy is currently being progressed with the aim of further improving the network across the City.

### **9.5.2 Infrastructure Considerations**

NPF4 promotes an infrastructure first approach that encourages the facilitation and early adoption of infrastructure within placemaking. This strengthens the development of infrastructure that meet the needs of a place and its communities. Infrastructure capacity in Dundee is considered comprehensively within the Infrastructure First & Local Living Topic Paper, and this will directly inform the spatial strategy.

In relation to transport, sustainable and active travel methods will be supported to enable local living. From a housing perspective, it is important to reduce car dependency and build in infrastructure that eases pressure on the road network. Further information can be found in Sustainable Transport Topic Paper.

### **9.5.3 Economic Considerations**

According to Scottish Government income estimates for 2018, the median income in Dundee in 2018 was £24,440. It is the lowest median income within the Tayside partner area with the highest being in Perth & Kinross (£30,160). This profile reflects the median income benchmarks which populate the HNDA Tool v4.0 (sourced from CACI Paycheck data).

Between 2014-18, Dundee median household incomes increased by 2% from £23,920 in 2014 to £24,440 in 2018. Analysis of data from the Scottish House Condition Survey (SHCS) 2017-19 reveals that the average income in Dundee was £23,500, which is significantly lower than both Scotland (£29,100) and all other Tayside partner areas.

CACI Paycheck data (2020) sets the median income in Dundee at £24,628 which is slightly higher than both Scottish Government 2018 estimates and SHCS estimates 2019. ONS Annual Survey of Hours and Earnings (2020) suggests a median weekly pay for all employees in Dundee is £460.

#### **Access to Mortgage Finance**

Analysis from Bank of England data detailing residential loans provided via the FCA, shows that first time buyer mortgages accounted for 21-24% of all mortgage loans between 2015-22, with a rise of almost 3% taking place between 2019 and 2020. The percentage of home-owners re-mortgaging accounted for 28% of all mortgages in Q4 2021 which is its highest rate since 2017. The Covid pandemic coupled with stricter bank lending requirements on large LTV mortgages have played a role with the figure for 2021 bouncing back to previously seen levels. In Q4 2021, the mean Loan-to-Value (LTV) ratio on new mortgages to first-time buyers in Scotland stood at 82%, an annual increase of 4.8 percentage points. Meanwhile, the mean LTV ratio for home movers in Scotland stood at 71% in Q4 2021, up 1.4 percentage points on the previous year (Source: UK Finance). Analysis of Bank of Income data on lending multiples reveals that for buyers on a single income, the most consistent lending multiple is 4.0 or over in 2021 (the highest in the 7-year period of data). For joint income borrowers, the most consistent LTV income multiple is 3 or over, representing 43% of all loans in Q4 of 2021. As the affordability calculation in the HNDA Toolkit uses a default LTI of 3.2 this analysis suggests there is no strong case to change this with 3.00 or over LTI (joint income) being the most recurring lending multiplier between 2015 and 2021.

#### **Private Renting**

The Local Housing Allowance across Dundee (£571) averages at 30% less than the costs of market rents (£744) and as a result 6 in 10 households cannot afford to rent privately when applying a 25% income to rent ratio and 5 in 10 cannot afford to rent privately applying a 30% income rent ratio.

Private rent prices rose to an average of £800 in April 2024, an annual increase of 11.4% from £718 in April 2023. This was higher than the rise in Scotland (10.0%) over the year.

According to Citylets, average private rents in Dundee have increased on average by 36.9% in the last three years to 2024 and rents average at £879 at quarter 1 of 2024

### **Economic Growth**

Dundee's Gross Value Added (GVA) per head is consistently the lowest of each Tayside partner and at a level of £39,050 sits well below the Scottish average of £52,549.

### **Employment**

Across Dundee, just under 67,000 people were employed in 2019, and whilst there has been a modest growth (1.7%) since 2009, growth is one of the lowest of Tayside partners and 15% lower than the growth experienced by Perth and Kinross.

Key industries in Dundee include (i) construction (ii) professional, scientific & technical sectors, (iii) accommodation and food services and (iv) retail which collectively account for half of all employment opportunities in the area.

Average Dundee weekly pay equals £498 which is the lowest of all Tayside partners and lower than the mean for Scotland (£558). Dundee City has the highest levels of economic inactivity at 27.2% across Tayside in 2019 and also a higher claimant count rate (7.2%) than the Scottish average (6%)

In 2020, 59 of the 188 (31%) of Dundee data zones were in the top 15% most deprived areas, this was an increase of 4 from the 55 data zones in 2016. There are only three local authorities who have a higher percentage of data zones in the 15% most deprived category.

## 10. Site Assessment Methodology

### Local Development Planning Guidance

The Scottish Government's Local Development Planning Guidance sets out the details of the expectations for implementing LDPs and brings together requirements from NPF4 and the Development Planning Regulations. In terms of relevance to a development site assessment process the Local Development Planning Guidance establishes that;

- Detailed policies and site proposals should not be included in the Evidence Report. Detailed site assessment will not be appropriate at the Evidence Report stage, but the planning authority could usefully establish a site assessment methodology that will be used to appraise sites and inform allocations for the Proposed Plan. This could also be linked or ideally integrated with the approach to SEA assessment.
- Following Gate Check, planning authorities may wish to undertake an optional 'Call for Ideas' consultation to allow all stakeholder to propose ideas and submit sites for consideration. The expectation of a 'Call for Ideas' consultation is to allow stakeholders to submit suggestions for proposed ideas and is not limited to proposing development sites or proposing a specific type of development. It is expected that proposals submitted would support the preparation of the spatial strategy within the Proposed Plan.
- All sites should be assessed using the site appraisal assessment methodology that was considered at the Evidence Report and Gate Check Review. The site assessment should cover (i) sites allocated in the current local development plan; (ii) sites proposed through any call for ideas; and (iii) any other sites the planning authority considers may have potential.
- No sites should automatically roll forward from one plan to the next without being assessed. All sites proposed to be allocated for the development in plans should have been assessed for their deliverability through the site assessment process.
- The site selection process should take an infrastructure first approach.
- De-allocations should be considered where sites are no longer deliverable.
- NPF4 is a key consideration. It is expected that planning authorities will use the framework's policies to support the development of their spatial strategy.

## **Strategic Environmental Assessment and Strategic Flood Risk Assessment**

The Local Development Plan is a qualifying plan that requires a strategic environmental assessment (SEA) under the Environmental Assessment (Scotland) Act 2005. The SEA will consider the environmental effects of the plan's spatial strategy, policies and site allocations. It will also consider how negative effects could be avoided or mitigated and how positive effects could be enhanced. The draft SEA scoping report has been submitted to the SEA Gateway Group for comment and will be finalised for submission as part of the Evidence Report.

The Strategic Flood Risk Assessment (SFRA) is to provide a high-level appraisal of the extent and nature of flood risk from all sources. The Water Environment topic paper includes the evidence and data that will inform the preparation of the SFRA. The SFRA and SEA will inform the level of current and future flooding and the suitability of these sites in terms of flood risk.

### **Site Assessment Methodology**

The Council will take into account sites that already benefit from planning permission and identify other sites that have the potential to accommodate appropriate development for the benefit of the City.

To achieve this a Development Site Assessment survey of land and buildings will be undertaken to assess development potential and deliverability. Using the survey information and taking account of other matters, decisions will be made as to which land to allocate for development in the Proposed Plan. The extent of survey necessary will vary depending upon the characteristics of a location: A brownfield site with existing planning permission may require less detail than a location with no history but at the conclusion of the process there should be confidence that the information gathered is sufficient to make an informed decision on whether to designate somewhere for development.

In addition to technical characteristics of a site, decisions must also consider whether designating a site would be in accordance with the policies and aims of the National Planning Framework and other plans and policies etc as well as being reviewed as part of the Strategic Environmental Assessment. Accordingly, achieving a high confidence through the Development Site Assessment process does not guarantee a site will be allocated.

In preparing the Proposed Plan, the Council propose four stages to the development site assessment.

#### **Stage 1: Information Gathering**

(in previous Local Development Plans this has included what has been referred to as a "call for sites"). Dundee City Council will collate together a list of all known land with development potential. This list is generated from sites already known to the Council as well as those suggested by communities and commercial interests during the "Calls for Ideas" consultation.

Technical information is then collated for each site on that list.

### **Stage 2: First Sieve**

The list is assessed to remove any sites that are unsuitable for development. Some sites may be restricted at this point for consideration only for particular uses – e.g. for industrial use if already surrounded by similar use.

### **Stage 3: Detailed Assessment of q (Second Sieve)**

The list is assessed to check if the sites can actually be developed – this may lead to conclusions that the site:

- a) Can be fully developed
- b) Only part of the site can be developed
- c) Cannot be developed and should be removed from the list

The assessment will include consideration of both physical aspects of the site and how well the site complies with National Planning Framework 4.

### **Stage 4: Detailed assessment**

With confidence that a site (or part of) can be physically developed this stage then includes measuring the capacity of the site and understanding the financial, environmental, infrastructure and resource demands of each site.

### **Development Site Information**

The following information that will be sought for each site:

1. A unique name for the site
2. Any previous site references: e.g. reference numbers from allocations in a Local Development Plan, designation numbers from the Employment Land Audit etc
3. Site Address
4. Site Area
5. Ownership Details
6. Planning History: any planning permissions or other works, is the site included in any Local Place Plan.
7. Is there a site planning brief for the location
8. Proposed Use
9. Projected Delivery Timescales

### **Physical Characteristics**

10. Brownfield or Greenfield?
11. Current Use.
12. Neighbouring uses
13. Topography / Site Orientation
14. Physical Constraints: e.g. pylons or substations
15. Vacant / Derelict Land: including if the site is on the Vacant and Derelict Land Register.

### **Environmental Characteristics**

16. Water Issues: Including known flood risk, drainage issues etc and any known mitigation requirements

17. Trees and Woodland: does the site have any tree cover and/or are there any tree protection orders in place?
18. Open Space & Nature: Is the site designated as open space, parkland or used for recreation. Does the site have any elements of known natural or biodiversity value. Is there capacity for positive contributions to open space / biodiversity provision? Are there any known protected species in the area or will surveys be required?
19. Environmental Protection Status: Is the site subject to any designations not covered elsewhere. Should include consideration of any adjacent land that might influence consideration of the site.
20. Contamination: to include any known contamination or knowledge of potential sources.
21. Air Quality: any uses on or adjacent to the site which might influence consideration of the site.
22. Historic Environment : is the site within a conservation area or otherwise affected by any historic designations
23. Green Network / Green Infrastructure: how well served is the site? Are there opportunities for improvement? Any core paths in the site or nearby?

#### **Infrastructure & public Services**

24. Transportation / Network Accessibility: both existing accessibility and to include notes on any opportunities that the site may offer.
25. Services and Digital Infrastructure: including Gas, Electricity, Broadband / District Heating
26. Waste Infrastructure
27. Education Services
28. Health Services

## **11. Spatial Strategy**

### **11.1 Current Spatial Strategy**

The spatial strategy for housing set out in the Dundee LDP 2019 was established by TAYPlan2, and set a strategic housing supply target of 6340 units. The LDP 2019 encouraged the delivery of more homes across the City, including significant development within the Strategic Development Area at the Western Gateway as well as the redevelopment of housing sites in regeneration areas such as Hilltown and Whitfield.

In accordance with the TAYplan Strategic Development Plan the LDP 2019 set the delivery of the housing supply target for Dundee City at a ratio of 25% affordable homes to 75% market homes. The LDP spatial strategy and policy approach will help to meet the Local Housing Strategy outcomes through improvements to the quality, affordability and choice of housing across tenures and markets. This was through the allocation within the Local Development Plan of a range of housing sites across the City to support the delivery of a variety of affordable housing types and tenures. Furthermore, the Local Development Plan strategy supports the delivery of affordable housing within the City through enabling the continued partnership working with the Scottish Government, affordable housing providers and developers and by guiding the managed release of surplus Council owned land through the Council's programme of land disposal.

The strategy for identifying additional land to meet the housing land requirement is to prioritise the reuse of brownfield land within the existing urban area. Greenfield land allocations at Baldragon and Linlathen were carried forward from the Dundee LDP 2014. To further support the growth of Dundee, the indicative capacity of the Linlathen allocation increased with an additional release of greenfield land in the north east at Ballumbie and the west at the Western Gateway. The additional greenfield land release at the Western Gateway is phased over the first 5 year period (2019-2024) and the second 5 year period (2025-2029) of the Plan. The land release at the Western Gateway was to support the continued delivery of what was a Strategic Development Area and together with the other housing land allocations to provide flexibility and choice in Dundee's housing market for house builders and occupiers. To ensure the housing strategy is delivered, the development of brownfield land must be carefully managed to ensure that the benefits of new developments are fully realised.

Under the Planning (Scotland) Act 2019 Strategic Development Plans will no longer be produced but groupings of authorities will instead identify the need and proposed locations for strategic development through the preparation of Regional Spatial Strategies. An indicative Regional Spatial Strategy for the Tayside area has been produced and was submitted to the Scottish Government to inform NPF4.



## **11.2 NPF4 Requirements**

NPF4 contains a national spatial strategy that guides decisions on development proposals and aims to introduce new concepts such as “just transition”, “conserving and recycling assets”, “local living”, “compact urban growth”, “rebalanced development”, and “rural revitalisation”.

These will be guiding principles in the adoption of our local spatial strategy and will influence how settlement options are considered. In terms of housing, local living and compact urban growth is in line with limiting greenfield expansion where appropriate. Consideration will be given to sustainable, liveable places and higher density options will be supported where these support transport, local living and meet housing needs.

## **11.3 Future Spatial Strategy**

The resulting spatial strategy will be largely developed based on existing allocations and capacities, whilst taking into account the constraints that exist in settlements across the local authority area. Whilst we appreciate that new housing offers benefits in relation to housing choice, addressing need and household growth we recognise that finding viable plots that deliver growth in the area is becoming increasingly difficult.

We recognise that some of the housing need could be met through a variety of means such as: addressing under-occupancy in existing homes; bringing empty homes back into use and regeneration of existing buildings. However, a significant part of meeting the net current housing need will be through the delivery of new homes.

The development plan will promote higher density housing options, and ensure their connection to existing settlements in terms of layout, density and mix, landscape and scale. LDP3 will demonstrate a commitment to continued growth, and will look to support initiatives such as town centre living, local living and a place-based approach to development which aligns with NPF4.

## **12. Proposed Plan Implications**

There is a national commitment to increasing house building levels and providing sufficient land to meet housing needs. The aim of LDP3 is to set out where housing developments will take place in a transparent way to ensure that successful places can be created, and positively impact upon Dundee.

Access to good quality housing is a key component of quality of life within our communities. To continue to deliver this it is important to ensure an effective and generous supply of land for housing is available at all times and to provide for a balance and choice in the type, size, tenure and location of housing within the City.

The Local Development Plan seeks to encourage a design-led approach to sustainable, high-quality placemaking, with the purpose of achieving quality residential environments through delivering new housing and in guiding the changes to existing homes and residential areas. The aim is to create places that complement the distinct character and identity of the different parts of the City and promote an integrated mix of land uses, including well-designed, energy efficient homes of different types and tenures.

### **Summary of Population, Households and Housing Stock**

Dundee has experienced a 2.5% increase in the number of households between 2008-2018 in Dundee, which is the smallest change in the Tayside area. Dundee is expected to have a 4% increase in the number of households between 2021 and 2043, which could stretch to 6% if there is high migration.

The outcomes of household projection scenarios create an estimate of new households emerging in the Dundee region over the next 20 years of between 2,449 using the principal household projections and 4,060 using the high migration/growth scenario.

The HNDA Survey data estimates that 17% of households in the Dundee area are spending more than 30% of their income on rent/mortgage costs. RSL rents are on average 24% higher than local authority rents with a monthly average of £420 compared to £339. Subsequently, 30% of households cannot afford an RSL rent without subsidy based on a 30% income to rent ratio.

The Covid-19 pandemic has seen housing affordability levels diminish across Dundee, with three times more people stating they are experiencing serious financial difficulties post pandemic. Housing solutions for lower income households need careful consideration as most options, even at entry level, are unaffordable.

### **Performance of Policy Interventions in Dundee**

Dundee has undertaken a range of large-scale regeneration projects across the city in terms of housing in Mill O'Mains, Whitfield, Lochee and Hilltown. These key regeneration areas have made significant contribution to the provision of high-quality homes in Dundee, with a desirable housing mix. The planned regeneration has guided development in these areas,

and proved successful as a mechanism for delivering quality environments through a masterplan approach.

The City Development Department prepared Site Planning Briefs to guide future development on specific development sites and Development Frameworks for Strategic Development Areas such as Western Gateway Development.

DCC have published a City Centre Strategic Investment Plan (CCSIP) with an ambition to double the resident population living in and around the city centre, ensuring that a diverse range of people and families choose to live in the heart of the city, supported by key services. The CCSIP encourages high-density development and design to improve and redefine our city centre to create liveable neighbourhoods. The CCSIP highlights the value of long-term planning, and integrates interventions such as reuse, repurposing and redevelopment to deliver homes and create better places.

### **Affordable Housing**

Consideration is required as to whether there is an evidence-base to support the formation of an Affordable Housing Policy and the potential impacts this could have on economic growth, development viability and overall house building in the city.

The introduction of an affordable housing policy would need extensive consideration based on the assumption that a need was identified at Proposed Plan stage. If progressing, a delivery mechanism would also need to be considered and established and there are a range of policy approaches and options that may be considered, such as:

- An exemptions framework – NPF4 Policy 16 could be a blanket policy across all private residential development proposals, but local guidance could provide a list of exemptions that would need to be demonstrated through the application process
- Developer Contributions – through pre-application discussions, can be determined on a site by site basis e.g. Residential developments comprising wholly social rented properties are exempt from most developer contributions in order to support their viability
- Greenfield land release for a negotiated Affordable Housing Contribution, subject to assessment in accordance with the LDP

At Proposed Plan stage consideration will be required to give regard to the resource implications of administering an affordable housing policy, and evaluate this against the benefits the policy would bring. Existing practice across planning authorities indicates that there is a significant resource requirement for administering a developer contribution based affordable housing policy. For DCC, this would likely require a dedicated team across a range of services. DCC would need to consider policy wording that is appropriate to meet the needs of the local people, whilst ensuring this does not negatively impact upon site density and viability.

## **Student Accommodation**

A current analysis of Purpose Built Student Accommodation (PBSA) in Dundee has revealed that a significant development pipeline has been established, with a number of units under construction, approved or pending decision. To ensure that there is not an oversupply of this type of accommodation future proposals will need to demonstrate that there is a need in the area for the accommodation proposed. It is likely that we will continue to need a policy approach to manage PBSA in Dundee, and have the flexibility to promote in suitable locations i.e. brownfield, or re-use of existing building to promote regeneration objectives.

## **HMO / Co-Living**

The NPF4 policy suite does not reflect the HMO market in Dundee, HMOs provide an important supply of housing within Dundee for a range of different people. Whilst many of the concerns relating to HMOs can be more appropriately managed through the licensing regime, there are a number of land use issues that HMOs can raise due to increased number of residents such as increased pressures on parking, amenity space and refuse facilities. In order to avoid an excessive concentration of HMOs within a particular area thresholds have been applied to HMO unit numbers within the census output areas.

## **Housing for Older People**

Dundee has a proportionately higher level of housing for older people than many other Scottish Local Authorities. Though there have been programmes to decommission sheltered housing, there is still evidence of low demand for some types. The increased provision of alarm services and other community care services have diminished the demand for traditional sheltered housing. The Council and its partners will continue to rationalise specialist housing for older people. As a result of this, it is not envisaged that there is a requirement for significant new development of specialist housing for older people. However, there may be need for higher dependency housing, as well as the flexibility for housing to be adapted to meet the needs of older people based on assessments with the Dundee Health and Social Care Partnership.

The current LHS sets out an ambition to improve housing quality of private rented sector tenants, especially the elderly and those vulnerable to adverse living conditions. This will remain a priority in the upcoming Local Housing Strategy, as will the consideration and needs of this demographic.

## **Housing for Disabled People**

As set out in the Dundee Local Housing Strategy (2019), the Dundee Health & Social Care Partnership identifies housing service development targets for individuals who require care and support or physically adapted housing, such as a wheelchair adapted house, to live independently in their respective communities. This includes physical disabilities, mental

health and well-being and learning disability and autism. Within the LHS, the Community Care Action Plan provides a baseline, target and timescale for the delivery of suitable accommodation to meet the specific needs of residents.

Within Dundee City there is a large demand for wheelchair adapted housing, the requirements are considered in every new build social rented development. Since 2015 there has been 45 new build social rented wheelchair units either completed or currently under construction in the City, there are also a further 137 proposed wheelchair units for future developments identified in the Strategic Housing Investment Plan (SHIP) 2019 – 24.

### **Housing for Gypsies and Travellers**

Dundee is projected to have a substantial surplus in site provision, at around 55 to 60 pitches over the next 5 years (an average of 11 – 13 pitches per annum). This surplus is in part a reflection of the relatively limited need for accommodation within the City. The Local Housing Strategy will make a commitment to engaging with this community to ensure that their needs are met in the locality, and provision can be reviewed as required.

### **Self-Build**

DCC has committed in the LHS to exploring self-build as an alternative delivery model, and will assess whether demand in the city would prompt a policy to encourage the supply of self-build homes. The Council will also explore the potential to consider self-build through Masterplan consent areas.

### **Short Term Lets**

The proposed plan should consider the spatial distribution of short-term lets and determine whether there is a need to designate a Control Area in Dundee. As a minimum, the planning authority should consider amenity implication at proposed plan stage. At the time of drafting, there were 224 STL applications for licencing and 31 applications for planning permission. Whilst the number of applications for planning permission are low, we anticipate an increasing as applicants become aware of the requirement for planning permission.

### **Windfall sites**

The urban nature and the ongoing regeneration within the city has resulted in windfall sites making a sizeable contribution to the supply of land for new housing in Dundee. As such, it may be appropriate to state that DCC are supportive of windfall sites coming forward on brownfield sites, where appropriate.

## **Development Site Assessment**

The Council intends to use a development site assessment checklist as part of the site assessment process. The site assessment methodology provides a high level overview of the process and the development site information checklist will be further customised to reflect the evidence required to prepare the new LDP and to ensure that it is fit for purpose. As part of the preparation of the Proposed Plan the draft site assessments will be circulated to statutory and internal consultees to add knowledge from their specialist remits. This information alongside the SEA will allow for the determination on the suitability of sites for inclusion in the LDP. All sites that may be deemed suitable for inclusion in the new LDP will be subject to further assessment to ensure that they are deliverable and effective. Landowners and developers will be required to complete an effectiveness and delivery checklist as part of the development site assessment process.

## 13. Summary of Findings

The key points from the Evidence Report are:

- Dundee has experienced minimal population growth at 2% between 2000-2019. In terms of population projections, the population in Dundee is projected to change by less than 1% across the period 2018-43.
- A review of Dundee City completions between 2013 – 2023 demonstrates an average build rate of 314 units per year. The ten-year trend demonstrates that historically, private completions are being delivered at a higher rate in the City than social completions.
- The HNDA estimates that between 2021 – 2040, between 2449 and 4060 new housing units are required to meet housing need (based on 3% and 6% population growth)
- The current HLA indicates that there is a substantial existing supply of housing land (4408 units of which 3954 are programmed as deliverable). There is an expectation that a significant proportion of this supply can be carried forward to LDP3; however, the deliverability of these sites will be reassessed as part of the site assessment process
- The MATHLR in NPF4 is set at 4300 for Dundee and scenarios for an indicative LHRL have been explored to exceed the MATHLR.
- In exploring options for our LHRL, we have evidenced that an uplift of 10% would be ambitious target but appropriate and based on evidence.

## 14. Appendices

DUNDEE CITY HOUSING NEED & DEMAND ASSESSMENT				
Key Findings Template: Estimate of Additional (New) Future Housing Units				
Total households with existing need (net)	2,250	Number of years to clear existing need	5	
<b>Household Projection Period</b>				
	2021-2041			
Total number of new households over the projection period	2,450	4,060		
<b>HNDA Projection Period</b>				
	2021-2041			
<b>HOUSING ESTIMATES - YEARS 1 TO 5</b>				
Total households over the projection period who may afford:	Scenario 1 - Principal Projection	Scenario 2 - High Migration		
<b>OWNER OCCUPATION</b>	116	216		
<b>PRIVATE RENT</b>	77	144		
<b>BELOW MARKET HOUSING</b>	82	152		
<b>SOCIAL RENT</b>	2,332	2,400		
<b>Total additional future housing units</b>	<b>2,607</b>	<b>2,912</b>		
<b>HOUSING ESTIMATES - YEARS 5 TO 10</b>				
Total households over the projection period who may afford:	Scenario 1 - Principal Projection	Scenario 2 - High Migration		
<b>OWNER OCCUPATION</b>	181	322		
<b>PRIVATE RENT</b>	120	215		
<b>BELOW MARKET HOUSING</b>	117	210		
<b>SOCIAL RENT</b>	106	190		
<b>Total additional future housing units</b>	<b>524</b>	<b>937</b>		



<b>HOUSING ESTIMATES - YEARS 10 TO 15</b>					
Total households over the projection period who may afford:	Scenario 1 - Principal Projection	Scenario 2 - High Migration			
<b>OWNER OCCUPATION</b>	330	485			
<b>PRIVATE RENT</b>	219	323			
<b>BELOWMARKET HOUSING</b>	201	296			
<b>SOCIAL RENT</b>	171	253			
<b>Total additional future housing units</b>	<b>921</b>	<b>1,357</b>			
<b>HOUSING ESTIMATES - YEARS 15 TO 20</b>					
Total households over the projection period who may afford:	Scenario 1 - Principal Projection	Scenario 2 - High Migration			
<b>OWNER OCCUPATION</b>	242	413			
<b>PRIVATE RENT</b>	162	275			
<b>FELOWMARKET RENT</b>	135	230			
<b>SOCIAL RENT</b>	109	186			
<b>Total additional future housing units</b>	<b>648</b>	<b>1104</b>			

<b>CUMULATIVE TOTAL AT END OF PROJECTION</b>					
Total households over the projection period who may afford:	Scenario 1 - Principal Projection	Scenario 2 - High Migration			
<b>OWNER OCCUPATION</b>	869	1,436			
<b>PRIVATE RENT</b>	578	957			
<b>BELOWMARKET HOUSING</b>	535	888			
<b>SOCIAL RENT</b>	2,718	3,029			
<b>Total additional future housing units</b>	<b>4,700</b>	<b>6,310</b>			

## Appendix 2: Existing and Effective Land Calculation

The effective land supply is derived from the established land supply (a) – constrained sites (b), we have then taken a 4-year average to reflect the time period since LDP2 was adopted.

HLA Audit	Established Land Supply (a)	Constrained Sites (b)	Effective Land Supply (a – b)	4 year average (ELS)
2019	4624	235	4398	4491
2020	4747	200	4547	
2021	4672	281	4391	
2022	5004	364	4640	

The 4 year average is then compared to the 2023 Audit Effective Land Supply figure of 3998, and the % decrease over the time period equates to an 11% decrease in the effective land supply.

We have then applied the same % decrease to the 2023 Audit figure to account for the projected 4 year period, based on evidenced average of delivery in the previous 4 years.

$$3998 - (1 \times 0.11) = 3558^*$$

\*Please note that we have rounded to 3500 for ease of interpretation in our LHLR calculations