

**TAYplan Strategic Development Plan Authority**

**Summary of Unresolved Issues (Schedule 4)**

*Issue 15: Policy 5 Housing – Policy 5 Parts A and B Scale and Distribution*

## Contents

### 1. Summary of Unresolved Issues

### 2. Copy of actual representations pertinent to this issue (*Personal details have been redacted. Full details have been provided to the DPEA separately.*)

- All representations include any attachments submitted by the respondent.
- Where representations were submitted in hard copy or by email these were entered into TAYplan's online system and all material originally submitted has been attached and appears here with the representation.

### 3. Library of documents

- All documents and extracts referred to in the representation and/or the Schedule 4 are either contained in the library attached to this Schedule or where over 50 pages within the Core Library (separate folders).

# 1. Summary of Unresolved Issues

Issue: 015 Scale and Distribution of Housing		
Development plan reference:	Page 17 Policy 5 Part A and Proposal 2 and associated Page 16 supporting text	Reporter: [Note: For DPEA use only]
Body or person(s) submitting a representation raising the issue and representation references		
<b>Seeking a change</b>		
<b>ID Number</b>	<b>Person/Organisation</b>	<b>Representation Reference</b>
548151	Andrew McCafferty for GD Strawson & J Farquharson	PLAN440
548151	Andrew McCafferty for GD Strawson & J Farquharson	PLAN454
548151	Andrew McCafferty for GD Strawson & J Farquharson	PLAN790
443109	Barton Willmore for Scotia Homes	PLAN382
416017	Colliers International for Persimmon Homes Ltd	PLAN43
416017	Colliers International for Persimmon Homes Ltd	PLAN44
416017	Colliers International for Persimmon Homes Ltd	PLAN46
541486	Colliers International for Taylor Wimpey East Scotland	PLAN66
541486	Colliers International for Taylor Wimpey East Scotland	PLAN67
541486	Colliers International for Taylor Wimpey East Scotland	PLAN69
450613	Councillor Michael A Barnacle	PLAN820
548525	Dr Peter Symon	PLAN900
548117	Dundas Estates & Development Co	PLAN463
445201	EMAC Planning for A&J Stephen	PLAN704
548522	EMAC Planning for A&J Stephen Ltd/Bett Homes Ltd	PLAN749
445204	EMAC Planning for Angus Estates Ltd	PLAN617
548523	EMAC Planning for Bett Homes Ltd	PLAN769
445206	EMAC Planning for J G Lang & Son	PLAN538
445203	EMAC Planning for James Keiller Estates Ltd	PLAN718
548383	EMAC Planning for L Porter	PLAN569
548360	EMAC Planning for M Batchelor (B)	PLAN532
548301	EMAC Planning for M Batchelor (K)	PLAN525
445205	EMAC Planning for Mr R Watson	PLAN512
548524	EMAC Planning for Stewart Milne Homes	PLAN785
543145	Forward Coupar Angus	PLAN829
445159	Geddes Consulting for Thomson Homes	PLAN887
445159	Geddes Consulting for Thomson Homes	PLAN888
445159	Geddes Consulting for Thomson Homes	PLAN893
543112	GS Brown Construction	PLAN86
547268	GVA for David Wilson Homes	PLAN450
548389	Halliday Fraser Munro for Barratt Homes	PLAN588
548389	Halliday Fraser Munro for Barratt Homes	PLAN589
548948	Hargest Planning Ltd for MacDonald Estates Ltd	PLAN859
442882	Homes for Scotland	PLAN219
263542	Kingsbarns Community Council	PLAN372
546838	Kinross-shire Civic Trust	PLAN495
450207	Largo Area Community Council	PLAN439
237724	Lomond Land	PLAN409
343111	Montagu Evans for Wallace Land Investment Management	PLAN329
349140	Montgomery Forgan Associates for Headon Developments	PLAN621
331497	Montgomery Forgan Associates for Taylor Wimpey	PLAN274
349134	Montgomery Forgan Associates for VGH (VICO Ltd/Bett Homes/Headon Devts)	PLAN578
548055	Mr Ian Fowler	PLAN393

544468	Mr John Riley	PLAN126
548486	Mr Ken Miles	PLAN834
344874	Mr Stewart McKiddie	PLAN645
543388	Mrs Anne Tynte-Irvine	PLAN93
545391	Mrs Jennifer Byrne	PLAN141
548408	Mrs Marion Lang	PLAN568
450286	Muir Group	PLAN168
450286	Muir Group	PLAN180
548051	Muir Smith Evans for Muir Homes Ltd	PLAN406
344887	Penelope Uprichard	PLAN873
344887	Penelope Uprichard	PLAN879
349010	PPCA Ltd for Alfred Stewart Properties Ltd	PLAN17
538105	PPCA Ltd for Edinmore Properties Ltd	PLAN18
453889	Royal Burgh of St. Andrews Community Council	PLAN915
453889	Royal Burgh of St. Andrews Community Council	PLAN923
453889	Royal Burgh of St. Andrews Community Council	PLAN924
330884	Ryden for Bon Accord Land Ltd/Stewart Milne Homes	PLAN129
443918	Scottish Government	PLAN640
443918	Scottish Government	PLAN661
444087	Scottish Property Federation	PLAN240
442871	Smiths Gore for Errol Park Estate	PLAN674
442870	Smiths Gore for Mansfield Estates	PLAN554
539251	Stewart Milne Homes	PLAN327
539251	Stewart Milne Homes	PLAN328
442290	Stuart Buchanan for Rosasco Properties	PLAN162
546491	TMS Planning for Champion Homes	PLAN228
546491	TMS Planning for Champion Homes	PLAN233
345005	TMS Planning for Mr James Thomson	PLAN241
345005	TMS Planning for Mr James Thomson	PLAN247
345007	TMS Planning for Mr Simon Wilson	PLAN399
345007	TMS Planning for Mr Simon Wilson	PLAN404
345006	TMS Planning for Mr Tim Esparon	PLAN197
345006	TMS Planning for Mr Tim Esparon	PLAN210
346675	TMS Planning for Muir Homes Ltd	PLAN359
346675	TMS Planning for Muir Homes Ltd	PLAN366
543976	Victoria Riley	PLAN107

## Support as written

<b>ID Number</b>	<b>Person/Organisation</b>	<b>Representation Reference</b>
419429	Auchterarder and District Community Council	PLAN108
442149	Bidwells for Zurich Assurance Ltd	PLAN671
423150	Braes of the Carse Conservation Group	PLAN24
445299	Inchture Areas Community Council	PLAN803
442806	Loch Lomond and the Trossachs National Park Authority	PLAN104
443979	Lynne Palmer	PLAN158
444081	Montagu Evans	PLAN461
443912	Montagu Evans for Inverarity Farms Ltd	PLAN362
445161	Montgomery Forgan Associates for Morris Leslie Group	PLAN659
442083	Montgomery Forgan Associates for Strategic Land (Scotland) Ltd	PLAN279
548051	Muir Smith Evans for Muir Homes Ltd	PLAN691
547933	Savills for Pilkington Trust	PLAN620

<b>Provision of the development plan to which the issue relates:</b>	The scale and distribution of house building that is planned for at TAYplan level and the constituent housing market areas on Page 16 supporting text, Policy 5 Part A and Proposal 2.
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**Planning Authority's summary of the representation(s):**

**SUMMARY OF REPRESENTATIONS SEEKING A CHANGE**

**CHANGE THE SCALE OF REGIONAL HOUSE BUILDING PLANNED**

**A. Increase the scale of regional house building being planned for**

Numerous representations seek an increase in the regional build rates set out in Page 16 supporting text and Policy 5 Part A/Proposal 2. Several of these proposals are shared by large groups of respondents, others set out individual proposals. In a number of cases an increase has been proposed along with an alternative. In a small number of cases the same respondent suggests several different increases in separate representations. This section sets out those proposals which are common (below) and then groups them by respondent. Respondents also shared similar justification for their proposals but to varying degrees. Due to the volume of representations this section summarises some of shared views. These propose increasing build rates to:

- 2,310 homes per year at regional level to reflect the Main Issues Report (2010) Option 2 Upper Range and the General Register Office Scotland (GROS) 2008-based population and household projections.
- 2,310 homes per year at regional level to reflect the Main Issues Report (2010) Option 2 Upper Range; Alternatively it is proposed to be '*ambitious and plan for substantial growth*' of between 2,300 and 2,500 homes per year to take account of the 2008 GROS Population and Household Projections.
- between 2,300 and 2,500 homes per year to take account of the 2008 GROS Population and Household Projections. Alternatively it is proposed to be '*more ambitious*' and reflect the upper limit identified by the TAYplan-wide Housing Needs and Demands Assessment (2010) of 3,590 homes per annum because the present build rate of 2,170 homes per year is '*significantly below this and barely above the bottom line*'.
- between 2,300 and 2,500 homes per year to take account of the 2008 GROS Population and Household Projections. Alternatively it is proposed to be '*more ambitious*' and plan for 30% over the existing requirement '*as has been done by other authorities in Scotland*'.
- reflect the TAYplan-wide Housing Need and Demand Assessment (2010) upper range and plan for 3,590 homes per year at regional level.

Issues relating to the effectiveness of housing land and various flexibilities around ensuring this in order to deliver the build targets in Policy 5/Proposal 2 are covered by Issues 016 Policy 5: Housing – Policy 5 Part A Effectiveness of Land, 017 Policy 5: Housing – Policy 5 Part C Areas surrounding Dundee and Perth Core Areas; and, 018 Policy 5: Housing – Policy 5 Part A Up to 10% shift between Housing Market Areas. Other issues relating to the effectiveness of Strategic Development Areas and alternative locations are covered by Issues 012 Policy 4: Strategic Development Areas – Policy 4 Part A Strategic Allocations; and, 013 Policy 4: Strategic Development Areas – Alternative Sites.

***Lomond Land (237724); GS Brown Construction (543112); Muir Group (450286) (PLAN180); Barton Willmore for Scotia Homes (443109); Montgomery Forgan Associates for Taylor Wimpey (331497); GVA for David Wilson Homes (547268); Halliday Fraser Munro for Barratt Homes (548389) (PLAN589); Geddes Consulting for Thomson Homes (445159) (PLAN887 and PLAN888); and, TMS Planning for (Campion Homes (546491) (PLAN233); Mr James Thomson (345005) (PLAN247); Mr Simon Wilson (345007) (PLAN404); Mr Tim Esparon (345006) (PLAN210); and, Muir Homes Ltd (346675) (PLAN366)***): Propose increasing build rates to 2,310 homes per year at regional level to reflect

the Main Issues Report (2010) Option 2 Upper Range and the GROS 2008-based population and household projections. They consider the 2006-based projections to be 'out of date'.

**Montgomery Forgan Associates for Taylor Wimpey (331497)** also propose an alternative to plan for 30% over the existing requirement 'as has been done by other authorities in Scotland including Aberdeenshire'. **TMS Planning for (Campion Homes (546491) (PLAN233); Mr James Thomson (345005) (PLAN247); Mr Simon Wilson (345007) (PLAN404); Mr Tim Esparon (345006) (PLAN210); and, Muir Homes Ltd (346675) (PLAN366))**: also consider the present approach is 'overly cautious' and presents unnecessary obstacles to sustainable economic growth. The respondents also assert that too much of the present supply is in 'large allocations with infrastructure/ phasing issues' which they consider will result in much lower build rates. The respondents suggest that whatever approach is adopted will require additional land allocations over and above the stated output levels to support the strategy. **TMS Planning for (Campion Homes (546491) (PLAN228); Mr James Thomson (345005) (PLAN241); Mr Simon Wilson (345007) (PLAN399); Mr Tim Esparon (345006) (PLAN197); and, Muir Homes Ltd (346675) (PLAN359))**: also propose amendments to Page 16 regarding the 2006-based population projections reflecting their proposed modifications to Policy 5.

**Homes for Scotland (442882); Dundas Estates & Development Co (548117); Smiths Gore for (Mansfield Estates (442870) and Errol Park Estate (442871)); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Montagu Evans for Wallace Land Investment Management (343111); and, Montgomery Forgan Associates for (Headon Developments (349140); and VGH (VICO Ltd/Bett Homes/Headon Devts) (349134))**: propose increasing build rates to 2,310 homes per year at regional level to reflect the Main Issues Report (2010) Option 2 Upper Range; Alternatively it is proposed to be 'ambitious and plan for substantial growth' of between 2,300 and 2,500 homes per year to take account of the 2008 GROS Population and Household Projections. **Montgomery Forgan Associates for VGH (VICO Ltd/Bett Homes/Headon Devts) (349134)** propose a different alternative of 30% above present rates 'as in Aberdeenshire' and they also propose an increase in the scale of Cupar Strategic Development Area.

**Colliers International for Persimmon Homes Ltd (416017) (PLAN43) and Taylor Wimpey East Scotland (541486) (PLAN66); and, Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Angus Estates Ltd (445204); Bett Homes Ltd (548523); J G Lang & Son (445206) James Keiller Estates Ltd (445203); L Porter (548383); M Batchelor (K) (548301); M Batchelor (B) (548360); Mr R Watson (445205); and Stewart Milne Homes (548524))**: all propose an increase to between 2,300 and 2,500 homes per year to take account of the 2008 GROS Population and Household Projections.

- As their alternative **Emac Planning for (Angus Estates Ltd (445204); J G Lang & Son (445206); L Porter (548383); James Keiller Estates Ltd (445203); M Batchelor (K) (548301); M Batchelor (B) (548360); and Mr R Watson (445205))**: propose that a more ambitious growth rate is provided in line with the upper limit identified by the TAYplan-wide Housing Needs and Demands Assessment (2010) of 3,590 homes per annum because the present build rate of 2,170 homes per year is 'significantly below this and barely above the bottom line'.
- As their alternative **Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Bett Homes Ltd (548523); and Stewart Milne Homes (548524))** propose that it would be more ambitious to plan for substantial growth, 'i.e. 30%' over the existing requirement which they suggest is 'similar to the practice of other authorities in Scotland'.
- **Colliers International for Persimmon Homes Ltd (416017) (PLAN43) and Taylor Wimpey East Scotland (541486) (PLAN66)** do not provide any alternative. **Colliers International for Persimmon Homes Ltd (416017) (PLAN43)** imply an increase of some kind but do not specify a particular figure.

**PPCA Ltd for Edinmore Properties Ltd (538105) and Alfred Stewart Properties Ltd (349010)** consider the housing figures to be '*wholly inadequate*' and seek an increase reflecting the TAYplan-wide Housing Need and Demand Assessment (2010) to fulfil Scottish Planning Policy (2010) requirements. This implies 3,590 homes per year.

**Andrew McCafferty for GD Strawson & J Farquharson (548151) (PLAN440, PLAN454 and PLAN790)** make several representations have been made which seek increases in build rates but which present different figures; each based on consideration that Policy 5 constrains growth and is '*inadequate to meet need and demand within the TAYplan region*'.

#### **Justification for these proposals**

The justification for the above approaches is shared by different respondents to varying degrees as summarised below. The key areas are questioning:

- whether Policy 5 presently meets the requirements in the TAYplan-wide Housing Need and Demand Assessment (2010) and whether it considers both the backlog and the anticipated need for affordable housing;
- TAYplan Topic Paper 2: Growth Strategy (June 2011) paragraphs 4.5, 4.7 and 4.8;
- The use of GROS 2006-based and 2008-based population and household projections;
- The consistency of Policy 5 with National Planning Framework 2 (2009) and Firm Foundations (2008); and, - check if this has been missed
- The relationship of the Proposed Plan approach and scale of growth with those of approved Structure Plans.

**Geddes Consulting for Thomson Homes (445159) (PLAN887 and PLAN888) and GS Brown Construction (543112):** consider that the conclusions of the Supporting Statement: *Review of Proposed Housing Requirement* by **Geddes Consulting for Thomson Homes (445159)** justifies their position. It suggests that:

- The housing requirement should be based on meeting both backlog and anticipated need and demand for net and affordable housing. It argues that Policy 5 fails to address the backlog of need identified in the TAYplan-wide Housing Need and Demand Assessment (2010). It also suggests that the rerun of 2008-based population and household projections in the TAYplan Housing Analysis Paper (2010) Section XX does not take into account the backlog of need and demand identified in the TAYplan-wide Housing Need and Demand Assessment (2010).
- Policy 5 fails to acknowledge Scottish Planning Policy (2010) paragraph 86 requiring affordable housing to be provided in the Housing Market Area where the need originates and that sites can be allocated for 100% affordable housing. It also suggests that Policy 5 fails to acknowledge that affordable housing need can be met by unsubsidised affordable housing as set out in Scottish Planning Policy (2010) paragraphs 86 to 88 and Planning Advice Note 2/2010 paragraph 5. Consequently the Supporting Paper concludes that this means the 75:25 ratio of market to affordable housing represents an underestimation in the housing land requirement.
- The GROS 2008-based population and household projections lead to higher levels of growth than planned for in Policy 5 and the TAYplan Housing Analysis Paper (2010) page 9 explains that these projections are equivalent to 2,280 homes per year which is similar to 2,310.
- The conclusions of Topic Paper 2: Growth Strategy (2011) Paragraph 4.5 and the past build rates examined in TAYplan Housing Analysis Paper (2010) section 8 to be incorrect. The Supporting Paper sets out figures based on the Fife Housing Land Audit (2010) and Scottish Government statistics showing that the highest regional build rates exceeded 2,400 in the year 2007/08. This is taken to justify a higher build rates than in Policy 5. The Supporting Paper also concludes that these build rates do not factor in meeting the backlog on need and demand identified in the TAYplan-wide Housing Need and Demand Assessment (2010).

- The Topic Paper 2: Growth Strategy (2011) and TAYplan Housing Analysis Paper (2010), particularly pages 22 and 27, both present unsubstantiated conclusions and these are considered unduly pessimistic by not planning for upper range as set out in the TAYplan-wide Housing Need and Demand Assessment (2010) and therefore represent an underestimation of requirements. The Proposed Plan is also considered to ignore the 54% of respondents to the Main Issues Report who preferred the upper range of the Preferred Option.
- Policy 5 does not reflect elements of Scottish Planning Policy (2010) paragraph 70.

**Homes for Scotland (442882); Dundas Estates & Development Co (548117); Smiths Gore for (Mansfield Estates (442870) and Errol Park Estate (442871)); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Angus Estates Ltd (445204); Bett Homes Ltd (548523); J G Lang & Son (445206); James Keiller Estates Ltd (445203); L Porter (548383); M Batchelor (B) (548360); M Batchelor (K) (548301); Mr R Watson (445205); and Stewart Milne Homes (548524)); and, Montagu Evans for Wallace Land Investment Management (343111)** consider that 2,170 homes per year is contrary to the TAYplan-wide Housing Need and Demand Assessment (2010) of 'between 2,050 to 3,590 homes per year' and falls 'well short of the upper end figure'. This is considered to constrain the potential growth in the housing market and the delivery of affordable housing through the private sector. **PPCA Ltd for Edinmore Properties Ltd (538105) and Alfred Stewart Properties Ltd (349010)** also consider the housing figures to be contrary to the TAYplan-wide Housing Need and Demand Assessment (2010).

**Homes for Scotland (442882); Dundas Estates & Development Co (548117); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Halliday Fraser Munro for Barratt Homes (548389) (PLAN589); Smiths Gore for (Mansfield Estates (442870) and Errol Park Estate (442871)); Montagu Evans for Wallace Land Investment Management (343111); and, Emac Planning for (J G Lang & Son (445206); L Porter (548383) M Batchelor (B) (548360); M Batchelor (K) (548301); and Mr R Watson (445205))** suggest that there has been a failure to plan for growth based on the Topic Paper 2: Growth Strategy; Page 6; Paragraph 4.5 statement that although the upper range figures would provide the best opportunity to meet the unmet need identified in the TAYplan-wide Housing Need and Demand Assessment (2010), the lack of public funding for affordable housing means that these figures are unlikely to be achievable.

**Homes for Scotland (442882); Dundas Estates & Development Co (548117); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Halliday Fraser Munro for Barratt Homes (548389) (PLAN589); Smiths Gore for (Mansfield Estates (442870) and for Errol Park Estate (442871)); Montagu Evans for Wallace Land Investment Management (343111); Andrew McCafferty for GD Strawson & J Farquharson (548151) (PLAN440); and, Lomond Land (237724)** consider that the Topic Paper 2: Growth Strategy; Page 6; paragraph 4.8 statement that it could be as damaging to the location objectives of the plan to have planned for too much development as it would have been to plan for too little to be false. They consider that Local Development Plans are capable of allocating sufficient land to accommodate higher numbers, without damaging location objectives of the Strategic Development Plan. **Lomond Land (237724)** also considers that no justification is provided for the 12 year projection in the Proposed Plan and that Topic Paper 2: Growth Strategy paragraph 4.7 provides no evidence of how the slow down will affect migration.

**Homes for Scotland (442882); Dundas Estates & Development Co (548117); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Smiths Gore for Mansfield Estates (442870) and Errol Park Estate (442871); Montagu Evans for Wallace Land Investment Management (343111); and, Emac Planning for (A&J Stephen (445201); A&J Stephen**

**Ltd/Bett Homes Ltd (548522); Bett Homes Ltd (548523) and Stewart Milne Homes (548524)** consider that the use of previous build rates to calculate how much housing could be built is an *'extremely flawed argument'*. These respondents also consider that Policy 5 at first appears generous because it identifies a larger annual target than was achieved on average 'up to 2008/09' [the start date for this average is not stated by the respondents]. However, this approach is considered to fail to recognise that a historically constrained land supply can artificially reduce build rates. It is suggested that *'highly attractive locations such as parts of North Fife and Perthshire would be able to achieve much higher rates of delivery if more land was allocated. In 2004/05 St Andrews and East Fife delivered build rates of 391 units, in comparison to only 114 in 2007/08. The market was still strong at this time so it must be assumed that it was a land supply issue that produced the lower numbers. The 04/05 figure is in excess of the upper range numbers in the background paper (350 units)'*.

**Homes for Scotland (442882); GVA for David Wilson Homes (547268); Dundas Estates & Development Co (548117); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Smiths Gore for Mansfield Estates (442870) and Errol Park Estate (442871); Montagu Evans for Wallace Land Investment Management (343111); and, Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Angus Estates Ltd (445204); Bett Homes Ltd (548523); J G Lang & Son (445206); M Batchelor (B) (548360); M Batchelor (K) (548301); Mr R Watson (445205); and Stewart Milne Homes (548524)):** consider that the Proposed Plan should be based on the GROS 2008-based Population and Household Projections as *'the most up to date information available'*. These respondents along with **Emac Planning for (L Porter (548383); and James Keiller Estates Ltd (445203))** and excluding **GVA for David Wilson Homes (547268)**; suggest that the Proposed Plan does not meet the ambition of Firm Foundations (to provide 35,000 homes per year) or National Planning Framework 2.

**Homes for Scotland (442882); Dundas Estates & Development Co (548117); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Smiths Gore for (Mansfield Estates (442870) and for Errol Park Estate (442871)); and, Montagu Evans for Wallace Land Investment Management (343111)** consider that recent changes in the housing market and nature of demand to mean that previous spatial strategies, and their influence on completion rates, are no longer relevant. *'Continuing with this approach'* is considered likely to seriously constrain the ability of individual Local Development Plans to react to local circumstances. It is also suggested that allocations in areas with higher market demand would be able to achieve higher rates of delivery if more land was allocated.

**Scottish Property Federation (444087)**

Suggest planning for higher population growth but do not state any particular scale. The respondent supports promoting the growth of Dundee City as a key economic driver and wish to see encouraged the development of sites that are *'capable of coming forward and have low development costs'*. They suggest land north and east of Dundee, which are *'traditionally popular areas for house purchasers'* along with locations on the A90 and A92 corridors, which are considered to have *'significant potential'* to accommodate employment, commercial and residential uses. This implies growth in the South Angus Housing Market Area.

**Hargest Planning Ltd for MacDonald Estates Ltd (548948 )**

Suggest *'explicitly identifying build rates for both 2013-2024 and 2025-2032 for the whole region and for individual housing market areas'*. They suggest build rates for the period 2013-18 should be *'the same as identified in Policy 5 i.e. 1,300 per annum for the region as a whole'*. They suggest that the periods 2019-24 and 2025-32 should be 2,800 per year as the average of the range in the TAYplan-wide Housing Needs and Demand Assessment (2010). This would result in build rates averaging of 2,500 homes per year for the period 2013-2024. This is because recent reductions low build rates resulting from the recession are anticipated to increase in the later part of this period and that this level to be *'very modest given the [GROS]*

2008- based forecasts'. This proposed change is considered to support sustainable economic development and social inclusion objectives. It is also asserted that the Main Issues Report demonstrated that a 'clear majority of respondents, including each of builders, land owners, local authorities, government agencies, community councils and members of the public judged that the upper ranges of housing numbers could be delivered given the present economic climate and recent 2008-based population forecasts'.

#### **B. Decrease the scale of regional house building being planned for**

**Royal Burgh of St. Andrews Community Council (453889 ) (PLAN915, PLAN923 and PLAN924)** propose modifications to reduce TAYplan-wide build rates to 1,870 homes per year and to change each of the housing market areas in Proposal 2. This is based on the assertion that there has been a double count of Annex 4 of the TAYplan-wide Housing Need and Demand Assessment (2010) that means the number of homes, 'both affordable and market, required each year lies between 1,740 and 2,980'. The proposed 1,870 homes per year is because this figure lies at 'the corresponding point within this range' as 2,170 homes per year does. The figures for each Housing Market Area have been produced using a 'corresponding pro-rata reductions of the required rates' based on this proposed reduction. They also consider that the growth in this area should not be based on depriving west of Scotland local authorities of population as suggested in Fig. 3.19 Option A in the TAYplan-wide Housing Need and Demand Assessment in referencing the 2006-based population and household projections.

Modifications are also proposed to Page 16 paragraph 6. The first modification would change the word "estimates" because this is considered to imply a more scientific approach than is appropriate. They cite more recent assessment by the Office of the Chief Economic Adviser suggests that "it may take until 2025/26 for the Scottish Government Budget to return to 2009/10 levels". Knock-on effects on the economy could well continue to be felt until that time. The second modification is a consequence of the proposed changes to the build rate and suggests that build rates beyond 2024 would be substantially lower.

**Penelope Uprichard (344887) (PLAN873) and Largo Area Community Council (450207); Mr Ian Fowler (548055)**: consider that the growth and population figures used by TAYplan are the 2006-based Population and Household Projections and that these are 'out of date'.

**Penelope Uprichard (344887) (PLAN873)** points out that the General Register Office Scotland population and household projections are not predictions but past trends continued which do not indicate what has happened, particularly with regard to second and holiday homes.

### **CHANGE THE SCALE OF HOUSE BUILDING PLANNED IN AN AREA WITHIN THE REGION**

This section summarises where representations seek a change to the level of house building planned at Local Authority or Housing Market Area level. However, in some cases reference has been made to settlements or a broad area which covers more than one Housing Market Area or Local Authority.

#### **A. Increase the scale of house building being planned for in an area**

**Royal Burgh of St. Andrews Community Council (453889) (PLAN924)** propose to increase the build rates for the Cupar and North West Fife Housing Market Area from 110 to 160 homes per year. This is because the present figure is considered insufficient to allow for the 1,400 homes at the Cupar North Strategic Development Area during the 12 year period [Assumed to refer to 2012-24].

**Colliers International for Persimmon Homes Ltd (416017) (PLAN44)** suggest increasing the build rates for the Kinross Housing Market Area to 100 homes per year to reflect the 'more optimistic' GROS 2008-based population and household projections.

**Hargest Planning Ltd for MacDonald Estates Ltd (548948)** proposes increasing build rates for the St Andrews and East Fife Housing Market Area to 275 homes per year (2013-24) and 310 homes per year (2025-32), equivalent to 11% of regional build rates compared with 10% at present. This is considered to support sustainable economic growth and inclusion by '*reducing house price pressure and the affordability of housing to the whole community*'. It is also asserted that two thirds of respondents to the Main Issues Report (2010) question on scale of housing growth support Option 2 Upper Range. It is also suggested that the GROS 2006-based population and household projections have now been superseded by the GROS 2008-based projections; the later of which implies a 1% rise above the previous. The fact that '*the Scottish Economy has now returned to growth*' is considered to mean that a recovery in presently low build rates will require higher output in later years.

**Stuart Buchanan for Rossco Properties (442290); Colliers International for Taylor Wimpey East Scotland (541486) (PLAN67); and, Muir Smith Evans for Muir Homes Ltd (548051)**: all consider that the house building figures for the Strathearn Housing Market Area should increase. **Stuart Buchanan for Rossco Properties (442290)** considers the figures in Proposal 2 to be '*woefully inadequate*' to address affordable housing for families and to provide for future residential requirements in south-west Perth, including Dunning. **Muir Smith Evans for Muir Homes Ltd (548051)** propose increases to reflect the Draft Alteration (Population and Households) to the Perth & Kinross Structure Plan (February 2009).

**Colliers International for Taylor Wimpey East Scotland (541486) (PLAN67)** suggest increasing the house building figures for the Strathearn Housing Market Area from 130 to 150 homes per year.

**Halliday Fraser Munro for Barratt Homes (548389) (PLAN588)**; consider that it is '*too prescriptive*' to allocate housing to housing market areas within Local Authorities. They also suggest it is not appropriate to base figures on recent build rates and should instead plan for accelerated growth. They consider the Proposal 2 build rates for the South Angus Housing Market Area to be a '*low build rate*' that '*does not reflect current demand*' because they consider that greenfield land releases here have been popular and quick to take off.

#### **B. Decrease the scale of house building being planned for in an area**

**Kinross-shire Civic Trust (546838); Councillor Michael A Barnacle (450613); and, Mr Ken Miles (548486)**: All consider the housing figures to be too high because of the current economic downturn. **Kinross-shire Civic Trust (546838)** implies that there will be insufficient demand within Kinross to deliver this scale of house building. **Councillor Michael A Barnacle (450613)** also questions the employment capacity to support such growth. **Councillor Michael A Barnacle (450613) and Mr Ken Miles (548486)** also consider that the housing figures for Kinross are unsustainable given the likely environmental impact.

**Mr Stewart McKiddie (344874); Mrs Anne Tynte-Irvine (543388); Victoria Riley (543976); Mr John Riley (544468); Penelope Uprichard (344887) (PLAN873 and PLAN879); Mrs Marion Lang (548408); Mrs Jennifer Byrne (545391); Largo Area Community Council (450207); and, Kingsbarns Community Council (263542)**: all seek a reduction in the house buildings figures for North East Fife and/or for specific housing market areas within North East Fife. **Mr Stewart McKiddie (344874)** considers the housing figures for North East Fife to be excessive, particularly the '*large scale residential development at Wormit*' and suggests reducing this figure to allow for '*more organic growth*'. **Victoria Riley (543976)** seeks a reduction in the housing allocation for North East Fife because this is '*a rural area with relatively few employment opportunities*'. She also considers that the '*present economic climate*' makes it '*doubtful*' that there is much demand for housing and further suggests that the RAF Leuchars could, if it closes, provide brownfield land for housing. It is also considered that this scale of house building would lead to buildings in the countryside '*outwith the settlement*

*envelope of villages*' and adversely impact on tourism and infrastructure. It is suggested that Dundee could help to solve '*any perceived housing shortfall for North East Fife at a stroke*'. **Mr John Riley (544468)** suggests that the addition of 35,200 homes is totally unrealistic and would place strain on the environment and landscape of North Fife as well on local infrastructure and services. It is asserted that the 'present hard economic times' will suppress demand. It is also suggested that there is plenty of brownfield land at Guard bridge paper mill, small areas of Wormit and possibly RAF Leuchars, and these should be developed first. It is also considered that large developments on greenbelt land should be avoided.

**Mrs Anne Tynte-Irvine (543388); Penelope Uprichard (344887) (PLAN873 and PLAN879); Mrs Marion Lang (548408); Largo Area Community Council (450207); and, Kingsbarns Community Council (263542):** specifically seek a reduction in the figure for St. Andrews and East Fife Housing Market Area. *Kingsbarns Community* seek a reduction from 210 to 150 homes per year because '*the closure of RAF Leuchars*' is considered likely to reduce housing demand such that fewer new homes are needed. **Mrs Anne Tynte-Irvine (543388) and Largo Area Community Council (450207)** consider that the build rates for the St. Andrews and East Fife Housing Market Area should be reassessed because they are '*poorly calculated figures from 2002*' and are '*inappropriately high and will destroy the very landscape which makes the area attractive*'. **Penelope Uprichard (344887) (PLAN873)** asserts that '*the Fife Structure Plan refers to 8% growth and the Proposed Strategic Development Plan to 1.28% growth in North Fife. In St. Andrews the growth is 17% growth or more*'. It is suggested that the lack of assessment of individual settlements is an '*unacceptably broad-brush approach*'. This is considered in the case of St. Andrews to be an attempt to '*exploit the town's popularity and is considered likely to lead to its destruction*'. She also considers there to be no evidence that the conclusions of the St. Andrews Strategic Study (1998) have been considered. The proposals for St. Andrews in the Fife Structure Plan (2009) and the Proposed Plan are considered to run directly counter to the Study's conclusions.

**Mrs Marion Lang (548408); Mrs Jennifer Byrne (545391)** consider the Fife Structure Plan figure of 35,200 homes across Fife to be unrealistic in view of the current economic climate and to be based on inaccurate figures that are now out of date.

### **C. Increase the scale of house building being planned for in an area and decrease it in another by a corresponding level**

**GVA for David Wilson Homes (547268)** suggest that there is a '*heavy reliance*' on high-density brownfield sites in Dundee City that are '*unlikely to make any contribution to the housing land supply*'. There is also considered to be a '*significant reliance*' on large greenfield sites to the west of Perth, which are '*dependent on major infrastructure provision*'. In other representations land is promoted at Kinross/Milnathort. This implies that either land ought to be released elsewhere in the Dundee City and Perth Housing Market Areas or elsewhere in the TAYplan region.

**Ryden for Bon Accord Land Ltd/Stewart Milne Homes (330884)** suggests that the house building rates for North Angus Housing Market Area in Proposal 2 are insufficient to support the growth of the Strategic Development Area at Montrose Port (identified in Policy 4) and therefore there should be a higher build rate. This is considered to support the integration of land uses and existing infrastructure networks. Conversely, they consider that Highland Perthshire and Cupar and North West Fife Housing Market Areas should have their house building targets reduced to allow for the higher level, suggested above, to be made to North Angus. This is because:

- Highland Perthshire is considered to be an area made up of only tier 3 settlements (See Policy 1) and this scale of growth is considered contrary to objectives to reduce carbon emissions. They also cast doubt on whether the market in Highland Perthshire would be capable of supporting this level of growth.
- Cupar and North West Fife because, although comparable with North Angus due to a

mixture of tier 2 and 3 settlements defined in Policy 1, allocates a larger annual figure than North Angus.

**Forward Coupar Angus (543145)** suggests that build rates should increase substantially to a minimum of 600 and up to 1,000 homes over the next 25 years across the Strathmore area and may offer a way to alleviate pressure at Scone. It is suggested that this will provide for a more balanced population in terms of 'educational attainment, skills and income creating more demand for local businesses, shops, community and tourist facilities and this reduce travel and prevent leakage to larger population centres'. These proposals would have potential implications for 'Perth'; 'Eastern'; and 'Forfar, Kirriemuir and the Glens' Housing Market Areas.

**Dr Peter Symon (548525)** suggests that level of housing for Dundee City should be increased by a 'very substantial quantity' because it is 'the most important focus of the regional plan'. It is suggested that build rates for the Perth Housing Market Area should be revised down and that build rates for the Kinross Housing Market Area could be increased.

## **FORMAT AND CLARITY**

### **A. Policy format**

**Colliers International for Persimmon Homes Ltd (416017) (PLAN46) and for Taylor Wimpey East Scotland (541486) (PLAN69)** consider that the Housing Land Audit for 2010 should be used to determine effective land supply instead of the 2008 Housing Land Audit.

**Muir Group (450286) (PLAN168)** suggest that the statement "to support Policy 5 build rates by 2024" is contradicted by the footnote to Policy 5 on Page 17 which says that the stated build rates are meant to be an achieved average over the first 12 years.

**Ryden for Bon Accord Land Ltd/Stewart Milne Homes (330884)** consider that the words 'not annually' contained in the footnote under Policy 5 on Page 17 are confusing and should be removed.

**Halliday Fraser Munro for Barratt Homes (548389) (PLAN588)** suggest the approach to allocating housing to housing market areas within Local Authorities to be too prescriptive and propose removal of 'the diagram' [assumed to be Proposal 2] and the reference to annual housing market area build rates.

**Geddes Consulting for Thomson Homes (445159) (PLAN893)** suggests that present format of Proposal 2, with average annual build rates, does not offer sufficient clarity. The respondent also suggests that the approach does not reflect the requirements of Scottish Planning Policy paragraph 72 to plan for the first 12 years and second 8 years. The respondents suggest a change to Proposal 2 to include total as well as annual figures.

**Scottish Government (443918) (PLAN640)** considers that the Proposed Plan does not explain what is meant by a generous land supply.

### **B. Linkages to elsewhere in the Proposed Strategic Development Plan**

**Scottish Government (443918): PLAN640:** consider that the connection between Policy 4 and Policy 5 is not transparent and that it would be helpful to have an indication of the location and scale of other housing development and an explanation of how Policy 4 and 5 relate to each other.

### **C. Elements of Policy coverage**

**Scottish Government (443918) (PLAN661):** recommend that the Strategic Development Plan should include reference to Gypsies and Travellers as they consider it would be helpful if it

required Local Development Plans to identify suitable locations for meeting the needs of Gypsies and Travellers based on the Housing Need and Demand Assessment.

## **SUMMARY OF REPRESENTATIONS SUPPORTING AS WRITTEN**

**Loch Lomond and the Trossachs National Park Authority (442806); Auchterarder and District Community Council (419429); Lynne Palmer (443979); Braes of the Carse Conservation Group (423150); Montagu Evans for Inverarity Farms Ltd (443912); Montagu Evans (444081); Montgomery Forgan Associates for Strategic Land (Scotland) Ltd (442083); and, Inchtute Areas Community Council (445299):** support Policy 5 as written. **Braes of the Carse Conservation Group (423150)** and **Inchtute Areas Community Council (445299)** consider that this distribution of housing to focus development in Perth and Dundee reducing carbon emissions. **Auchterarder and District Community Council (419429)** support the content layout and form of words but also emphasise the importance of monitoring. **Montagu Evans for Inverarity Farms Ltd (443912)** and **Montagu Evans (444081)** support being bold and clear on shaping better quality places, location emphasis and on being ready and the flexibilities it provides. **Montgomery Forgan Associates for Strategic Land (Scotland) Ltd (442083)** support the flexibility in Policy 5 Part B relating to Dundee City, which they consider to offer the best prospects for securing the wider regeneration aims for Dundee.

**Savills for Pilkington Trust (547933)** support the provision of an effective housing land supply but consider that emphasis should be given to Perth West/North West Strategic Development Area to ensure delivery of 2,170 homes per year.

**Montgomery Forgan Associates for Morris Leslie Group (445161)** supports Page 16 Bullet Point 1 because they consider their Master Plan for Perth Airport to advocate a mix of employment, housing and education within the one location.

**Bidwells for Zurich Assurance Ltd (442149)** welcome ambitious build rates in Policy 5 but have some concerns about 'over-reliance on constrained sites within Perth Core Area' in particular Perth West/North West, Scone.

**Muir Smith Evans for Muir Homes Ltd (548051)** supports the inclusion of Muirhead within the Dundee Core Area as a location for housing as they are promoting a site on the edge of this settlement [as presently defined in the Angus Local Plan Review 2009].

### **Modifications sought by those submitting representations:**

**NOTE TO REPORTER:** The text in italics in this section has been lifted directly from the each individual/organisation's representation with minor typographical errors corrected.

## **CHANGE THE SCALE OF REGIONAL HOUSE BUILDING PLANNED**

### **A. Increase the scale of regional house building being planned for**

#### **Geddes Consulting for Thomson Homes (445159) (PLAN887 and PLAN888):**

- Imply a modification to amend Policy 5 Part A and Proposal 2 to reflect yearly build rates of 2,310 homes per year at regional level.
- Proposed modification to Page 16 Paragraph 3 Sentence 2 to say '*This Plan sets out a framework to identify effective housing land to enable the delivery of 2,320 homes per year as a minimum across the TAYplan region, including sites already with planning permission. the existing effective housing land supply*'.
- Proposed modification to Page 16 Paragraph 4 to say '*Planning for this level of build broadly reflects the changes in the General Register Office Scotland 2008-based projections\*\* but with growth in Dundee City reflecting Policy 1.*
- Proposed modification to Page 16 Paragraph 4 to delete '*Significantly higher levels of*

*growth are presently considered undeliverable*’.

**Barton Willmore for Scotia Homes (443109); Lomond Land (237724); GS Brown Construction (543112); Muir Group (450286) (PLAN180); Montgomery Forgan Associates for Taylor Wimpey (331497); Halliday Fraser Munro for Barratt Homes (548389) (PLAN589)** imply modifications to Page 16, Policy 5 Part A and Proposal 2 that plan for 2,310 homes per year and to replace references to GROS 2006-based population and household projections with the GROS 2008-based projections.

**TMS Planning for (Campion Homes (546491) (PLAN228 and PLAN233); Mr James Thomson (345005) (PLAN241 and PLAN247); Mr Simon Wilson (345007) (PLAN399 and PLAN404); Mr Tim Esparon (345006) (PLAN197 and PLAN210); and, Muir Homes Ltd (346675) (PLAN359 and PLAN366)):**

- Propose modification of Page 16 paragraph 4 to replace the ‘GROS 2006-based projections’ with the ‘GROS 2008-based projections and related assumptions for housing requirement’.
- Propose an increase in the overall build rate to ‘2,310 homes per year’ and modifications of Policy 5 Part A sentence 2 to account for this with an increase from ‘...in the order of 26,000...’ to ‘...in the order of 28,000...’.
- Propose a modification to Policy 5 Part A line three to say ‘...land to promote the delivery...’.

**Homes for Scotland (442882); Dundas Estates & Development Co (548117); Smiths Gore for (Mansfield Estates (442870) and for Errol Park Estate (442871)); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Montagu Evans for Wallace Land Investment Management (343111); and, Montgomery Forgan Associates for (Headon Developments (349140); and for VGH (VICO Ltd/Bett Homes/Headon Devts) (349134))** propose modifications to Page 16, Policy 5 Part A and Proposal 2 to increase build rates to 2,310 homes per year or; alternatively to between 2,300 and 2,500 homes per year

**Montgomery Forgan Associates for VGH (VICO Ltd/Bett Homes/Headon Devts) (349134)** propose alternative modifications to increase to 30% above present rates.

**Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Angus Estates Ltd (445204); Bett Homes Ltd (548523); J G Lang & Son (445206); James Keiller Estates Ltd (445203); L Porter (548383); M Batchelor (B) (548360); M Batchelor (K) (548301); Mr R Watson (445205); and for Stewart Milne Homes (548524))** all propose modifications to Page 16, Policy 5 Part A and Proposal 2 to increase build rates to between 2,300 and 2,500 homes per year.

- As their alternative **Emac Planning for Angus Estates Ltd (445204); J G Lang & Son (445206); James Keiller Estates Ltd (445203); L Porter (548383); M Batchelor (B) (548360); M Batchelor (K) (548301); Mr R Watson (445205)** propose modifications to increase build rates to 3,590 homes per annum.
- As their alternative **Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Bett Homes Ltd (548523); and for Stewart Milne Homes (548524))** propose modifications to increase build rates to 30% over the existing requirement.

**Colliers International for (Persimmon Homes Ltd (416017) (PLAN43) and Taylor Wimpey East Scotland (541486) (PLAN66))** imply deletion of the phrase ‘*significantly higher levels of growth are presently considered undeliverable*’ in the final sentence of Page 16 Paragraph 4.

**PPCA Ltd for (Edinmore Properties Ltd (538105) and Alfred Stewart Properties Ltd (349010))** imply modifications to increase the level of house building 3,590 homes per year.

**Andrew McCafferty for GD Strawson & J Farquharson (548151) (PLAN440):** No

modifications identified that relate to Policy 5 or Page 16.

**Andrew McCafferty for GD Strawson & J Farquharson (548151) (PLAN454 and PLAN790):** propose modifications to Page 16, Policy 5 Part A and Proposal 2 to:

- Increase build rates to 2,310 homes per year.
- Increase build rates to 3,000 homes per year.

**Scottish Property Federation (444087):**

- Propose a modification to Page 16 and Policy 5 Part A and Proposal 2 that would plan for a higher level of population. [No figures are provided as to what this should be]
- Propose modifications that imply changes to Policy 5 Part C to see residential land allocated north and east of Dundee City.

**GVA for David Wilson Homes (547268):** Propose modifications to Policy 5 Part A and imply modifications to Proposal 2 relating to Perth & Kinross; that are based on the GROS 2008 household projections. [This is taken to mean 2,310 homes per year].

**Hargest Planning Ltd for MacDonald Estates Ltd (548948):** Propose modifications to Policy 5 Part A to change house building rates for the TAYplan region as follows:

- 2013-24 – 2,500 per year (1,300 per year 2013-18 and 2,800 per year 2019-24)
- 2025-32 – 2,800 per year

**B. Decrease the scale of regional house building being planned for**

**Royal Burgh of St. Andrews Community Council (453889 ) (PLAN923 and 924)** Propose modifications to:

- Page 16 Paragraph 3 to say "*The TAYplan-wide Housing Need and Demand Assessment identifies the likely need and demand for between 2,050\* and 3,590 affordable and market homes per year if the current backlog of affordable housing is filled over a ten year period. Thereafter lower rates would be appropriate. This Plan therefore sets out a framework to identify effective housing land to enable the delivery of around 1,870 homes per year across the TAYplan region, including sites already with planning permission*".
- Policy 5 Part A Sentence 2 to say "*to provide an effective and generous supply of land to assist in the delivery of in the order of 22,400 units up to year 2024 across TAYplan.*"
- Policy 5 Part A sentence 3 to say "*In the period 2024 to 2032 approximately 15,000 further units may be required.*"
- Policy 5 Proposal 2 to replace build rates with:

Housing Market Area	Average annual build rate
Highland Perthshire	70
Perth	440
Eastern	100
Strathearn	110
Kinross	60
Dundee City	530
South Angus	70
West Angus (Forfar, Kirriemuir & the Glens)	80
East Angus (Arbroath)	70
North Angus (Brechin and Montrose)	70
St Andrews and East Fife	140
Cupar and North West Fife	130
<b>Total</b>	<b>1,870</b>

- Page 16 Paragraph 6 to say "*The TAYplan-wide Housing Need and Demand Assessment suggests that the recovery in demand may be complete by 2018/19*".
- Page 16 Paragraph 6 to say "*If the current backlog of affordable housing has been met by that stage, the scale of growth for 2024-32 is likely to be somewhat lower*".

- Page 16 Bullet Point 2 to say "*Whilst average annual build rates are identified, these are only averages and the period in which these average build rates should be achieved is the 12 years to 2024*".

**Royal Burgh of St. Andrews Community Council (453889 ) (PLAN915):** No modifications identified.

**Penelope Uprichard (344887) (PLAN873) and Largo Area Community Council (450207)** propose modifications to Page 16, Policy 5 Part A and Proposal 2 to reduce the regional build rates.

**Mr Ian Fowler (548055):** No modification identified.

## **CHANGE THE SCALE OF HOUSE BUILDING PLANNED IN AN AREA WITHIN THE REGION**

### **A. Increase the scale of house building being planned for in an area**

**Colliers International for Persimmon Homes Ltd (416017) (PLAN44)** propose modifications to Proposal 2 to increase build rates for the Kinross Housing Market Area to 100 homes per year.

**Hargest Planning Ltd for MacDonald Estates Ltd (548948)** proposes modifications to Proposal 2 to increase build rates for the St. Andrews and East Fife Housing Market Area to 275 homes per year (2013-24) and 310 homes per year (2025-32).

**Stuart Buchanan for Rossco Properties (442290); Colliers International for Taylor Wimpey East Scotland (541486) (PLAN67); and, Muir Smith Evans for Muir Homes Ltd (548051):** Propose modifications to Proposal 2 to increase build rates in the Strathearn Housing Market Area.

**Colliers International for Taylor Wimpey East Scotland (541486) (PLAN67)** propose modifications to Proposal 2 to increase build rates in the Strathearn Housing Market Area to 150 homes per year.

**GVA for David Wilson Homes (547268):** imply modifications to Proposal 2 to reduce build rates for the Dundee City and Perth Housing Market Areas and to increase those for the Kinross Housing Market Area.

**Halliday Fraser Munro for Barratt Homes (548389) (PLAN588)** propose modifications that remove from **Proposal 2** allocations to Housing Market Areas level and increase build rates for the South Angus Housing Market Area.

### **B. Decrease the scale of house building being planned for in an area**

**Kinross-shire Civic Trust (546838); Councillor Michael A Barnacle (450613); and, Mr Ken Miles (548486)** propose modifications to **Proposal 2** to reduce build rates for Kinross housing market area.

**Mr Stewart McKiddie (344874); Mrs Anne Tynte-Irvine (543388); Victoria Riley (543976); Mr John Riley (544468); Penelope Uprichard (344887) (PLAN873 and PLAN879); Mrs Marion Lang (548408); Mrs Jennifer Byrne (545391); Largo Area Community Council (450207); and, Kingsbarns Community Council (263542)** propose modifications to Proposal 2 that would see a reduction in build rates for North East Fife.

**Mrs Anne Tynte-Irvine (543388); Penelope Uprichard (344887) (PLAN873); Largo Area Community Council (450207); and, Kingsbarns Community Council (263542)** specifically propose modifications to Proposal 2 to reduce build rates for St. Andrews and East Fife Housing Market Area.

**C. Increase the scale of house building being planned for in an area and decrease it in another by a corresponding level**

**Ryden for Bon Accord Land Ltd/Stewart Milne Homes (330884)** propose modifications to Proposal 2 that would increase building rates for North Angus Housing Market Area and decrease them for Highland Perthshire and for Cupar and North West Fife Housing Market Areas.

**Forward Coupar Angus (543145)** proposes modifications that would potentially change build rates in Proposal 2 for Perth, Eastern and Forfar, Kirriemuir and the Glens Housing Market Areas.

**Dr Peter Symon (548525)** proposes modifications to Proposal 2 to increase house building rates for Dundee City and Kinross Housing Market Areas and to reduce them for Perth Housing Market Area.

**FORMAT AND CLARITY**

**A. Annual build rates**

**Colliers International for Persimmon Homes Ltd (416017) (PLAN46) and for Taylor Wimpey East Scotland (541486) (PLAN69):** No modifications identified.

**Muir Group (450286) (PLAN168)** propose modification to Page 16 Paragraph 7 (top column 2) to replace 'to support reaching Policy 5 build rates by 2024' with new text to say 'to achieve the Policy 5 build rates over the 12 years to 2024'.

**Ryden for Bon Accord Land Ltd/Stewart Milne Homes (330884)** propose modifications to Page 17 footnote to delete the words 'not annually'.

**B. Format of policy**

**Halliday Fraser Munro for Barratt Homes (548389) (PLAN588)** proposed modifications to Policy 5/Proposal 2 to remove figures for housing market areas and to also remove the diagram/map that forms Proposal 2.

**Geddes Consulting for Thomson Homes (445159) (PLAN893)** propose that a tabular format be inserted into Proposal 2 to show total build rates and the additional amount that Local Development Plans are expected to allocate up to year 7.

**Scottish Government (443918) (PLAN640)** implies the need to explain what is meant by a generous land supply.

**C. Linkages to elsewhere in the Proposed Strategic Development Plan**

**Scottish Government (443918): PLAN640:** propose the addition of text to explain the links between Policy 4 and Policy 5 to indicate the location and scale of other housing development.

**D. Elements of Policy coverage**

**Scottish Government (443918): PLAN661:** propose a possible modification to require Local Development Plans to identify suitable locations for meeting the needs of Gypsies and Travellers.

## **RESPONSES TO REPRESENTATIONS SEEKING A CHANGE**

The Proposed Plan vision and objectives centre on providing for a better quality of life through sustainable economic growth, improving the quality of places, improving resilience and tackling climate change. This reflects the principles set out in the Scottish Government Economic Strategy (2007) (CL/Doc3), National Planning Framework 2 (2009) (CL/Doc1), Scottish Planning Policy (2010) (CL/Doc2), the requirement to plan for sustainable development in the Planning etc. (Scotland) Act 2006 (CL/Doc17), the Climate Change (Scotland) Act 2009 (CL/Doc13), and other environmental legislation.

The Proposed Plan's and Scottish Government's inter-related objectives can only be tackled properly, consistently and completely within the context of sustainable development and sustainable economic growth. For this reason the Proposed Plan focuses the majority of additional development within the region's principal settlements defined in Policy 1. These are where the majority of people, jobs services and infrastructure already exist as discussed in Topic Paper 6: Spatial Strategy (June 2011) Paragraph 3.4 (015/SL/Doc84). Together the Proposed Plan's eight policies provide clarity for where development should and should not be and the expectations for the location, design and layout of new development. Policy 5 explains the overall scale of house building that is being planned for and Proposal 2 explains how this has been distributed to reflect both the TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49) and the requirements of the Proposed Plan as a whole. The Proposed Plan is not a housing plan, rather it is a strategic land use plan which is about place making and place shaping and how the area should change over time. Within this context it sets out, where required, generous levels of housing and employment growth.

The TAYplan-wide Housing Need and Demand Assessment (HNDA) (2010) (CL/Doc49) was declared 'robust and credible' in a letter from the Scottish Government's Centre for Housing Market Analysis in January 2011 (CL/Doc70). The Scottish Government's Housing Need and Demand Assessment Guidance (March 2008) Page 7 (015/SL/Doc68) explains that where a Housing Need and Demand Assessment is robust and credible its approach will not be considered at examination. Instead the examination will focus on the proposed spatial policies for housing set out in the Proposed Plan and their relationship with the findings of the housing need and demand assessment. This is critically important to how some of the issues raised within the Schedule are considered by Ministers.

### **CHANGE THE SCALE OF REGIONAL HOUSE BUILDING PLANNED**

- A. Increase the scale of regional house building being planned for; and,**
- B. Decrease the scale of regional house building being planned for**

Those wishing to build homes or who own land generally wish to see a larger scale of house building at regional level and/or in areas they are promoting. Those who wish to protect their localities from what they perhaps consider to be unnecessary growth seek a reduction in the overall target or, more specifically, in their area. All question the methodology by which the scale and distribution in Policy 5 has been derived, arguably in order to justify their position. However, the fact that they do this does not mean that they are accurate in their assertions and does not mean that what they propose would complement other parts of the Proposed Plan. Any alteration in the scale of house building planned for, whether at TAYplan level and/or within one or more housing market areas, will have some impact on the delivery of other policies and objectives.

***Geddes Consulting for Thomson Homes (445159) (PLAN887 and PLAN888); GS Brown Construction (543112); Homes for Scotland (442882); Dundas Estates & Development Co (548117); Smiths Gore for (Mansfield Estates (442870) and Errol Park Estate (442871)); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Emac Planning for***

**(A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Angus Estates Ltd (445204); Bett Homes Ltd (548523); J G Lang & Son (445206); James Keiller Estates Ltd (445203); L Porter (548383); M Batchelor (B) (548360)); M Batchelor (K) (548301); Mr R Watson (445205); and Stewart Milne Homes (548524)); PPCA Ltd for (Edinmore Properties Ltd (538105) and Alfred Stewart Properties Ltd (349010)); Andrew McCafferty for GD Strawson & J Farquharson (548151) (PLAN454 and PLAN790); and, Montagu Evans for Wallace Land Investment Management (343111):** The Scale of house building in Policy 5/Proposal 2 is based on the conclusions of the TAYplan-wide Housing Need and Demand Assessment (2010) and a series of wider strategic economic, social and environmental considerations consistent with Scottish Planning Policy (2010) paragraph 70 (015/SL/Doc29). These wider considerations include the land supply, demographic and strategy implications of various build rates; which also form part of the TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49) itself. Topic Paper 2: Growth Strategy (June 2011) (CL/Doc31) and the TAYplan Housing Analysis Paper (2010) (015/SL/Doc8), both published alongside the Proposed Plan (2011) provide further background information and clarity on this issue. A number of other assessments and studies support these conclusions including:

- Strategic Environmental Assessment carried out for the Main Issues Report (2010) (CL/Doc41);
- TAYplan Habitats Regulations Appraisal (2011) (CL/Doc66);
- Transport Modelling by MVA Consulting (2010) (CL/Doc68);
- TAYplan Strategic Flood Risk Assessment (2011) (CL/Doc65);
- TAYplan Housing Analysis Paper (2010) (015/SL/Doc8);
- TAYplan Greenhouse Gas Regional Inventory Programme (2011) (CL/Doc67); and,
- Background Technical Note to the Main Issues Report (2010) (CL/Doc58).

The suggestion by some respondents that a new build target closer to the upper range of 3,590 per year should be planned for to better meet affordable housing needs fails to properly understand the TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49). It concluded that the region requires between 2,050 and 3,590 housing solutions per year to deal with the both backlog and the anticipated level of need and demand for affordable and market housing. These figures are not build targets, as some representations suggest; they are instead the number of instances where the present housing stock or new-build will need to provide a solution of some kind; as acknowledged in the TAYplan-Housing Need and Demand Assessment (2010) Page 9 Paragraph 3.16 (015/SL/Doc80). This is because some of the need and demand will be met by moves within or modifications to the existing housing stock. The Proposed Plan identifies the scale of land supply to facilitate the delivery of the new house building component to reflect this and to meet the Plan's locational and place shaping objectives. The TAYplan-wide Housing Need and Demand Assessment (2010) Appendix 1 (015/SL/Doc80) concludes two possible build rates each with an upper and lower range. These were consulted upon at Main Issues Report stage (2010) as explained in Topic Paper 2: Growth Strategy (2011) Section 3 (015/SL/Doc81); and subsequently Policy 5 plans for in the order of 2,170 homes per year to be provided through new build.

The upper range (3,590 per year) has a ratio of almost 50:50 for affordable to market housing solutions (almost 1 for 1) (TAYplan Housing Need and Demand Assessment (2010) Page 41 Section 5.9 for the period 2009-18) (015/SL/Doc79). The lower range (2,050 housing solutions per year) has a ratio of 58:42. The TAYplan Housing Analysis Paper (2011) Section 3 (015/SL/Doc72) makes a crude assumption which annualises these figures and extrapolates them for the 2012-32 Plan period. In doing so it concludes that, considering a broad range of factors, planning for 2,170 homes per year would accommodate the vast majority of market housing along with some new build affordable housing at 75:25 ratio based on Scottish Planning Policy (2010) paragraph 88 (015/SL/Doc19) (the paper recognised that this ratio may vary between housing market areas). This helped understand the outcomes of maximising the

delivery of affordable and market housing at a realistically deliverable ratio.

Although **Royal Burgh of St. Andrews Community Council (453889) (PLAN915 and PLAN923)**; consider this to be a double count the key point is not the figure but the ratio. This is because any approach using the TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49) to justify planning for a build rate of 3,590 homes per year must, in doing so; also accept the accompanying conclusion for the ratio of market to affordable housing. Therefore these respondents must, intentionally or not, be suggesting that they wish to provide for significantly more affordable housing on almost a one for one basis and that the increase they are suggesting would be made up of, almost wholly, affordable housing. TAYplan does not consider this outcome to be realistic.

The **Geddes Consulting for Thomson Homes (445159) (PLAN887 and PLAN888)** assertion that there is an underestimation of the Housing Land Requirement as a result of considering this ratio is false. The 25:75 ratio is a working assumption to understand the broad scale of affordable housing capable of delivery alongside new build market housing. TAYplan Housing Analysis Paper (2010) paragraph 3.2 (015/SL/Doc72) acknowledges that these ratios will vary for different housing market areas, consistent with Scottish Planning Policy (2010) paragraph 88 (015/SL/Doc19). The suggestion that this working assumption has led to some sort of underestimation in the housing land requirement is not credible. The variety of affordable housing solutions envisaged by Scottish Planning Policy (2010) paragraphs 86 to 88 (015/SL/Doc19) and by Planning Advice Note 2/2010 paragraph 5 (015/SL/Doc69) and the extent to which affordable housing needs are balanced against other infrastructure requirements will be a matter for Local Development Plans and individual planning decisions. There is no added value to the Proposed Plan in repeating existing policy and advice.

**Geddes Consulting for Thomson Homes (445159) (PLAN887 and PLAN888); Homes for Scotland (442882); Dundas Estates & Development Co (548117); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Halliday Fraser Munro for Barratt Homes (548389) (PLAN589); Smiths Gore for (Mansfield Estates (442870) and Errol Park Estate (442871)); Montagu Evans for Wallace Land Investment Management (343111); and, Emac Planning for (J G Lang & Son (445206); L Porter (548383) M Batchelor (B) (548360); M Batchelor (K) (548301); and Mr R Watson (445205))**: The suggestion that TAYplan fails to plan for growth because Topic Paper 2: Growth Strategy (June 2011) Paragraphs 4.5 (015/SL/Doc82) refers to considering recent build rates to understand what levels of house building could be achieved is incorrect. Paragraph 4.5 is an extract from the executive summary of the TAYplan Housing Analysis Paper (2010). This paper considers a wide range of factors in drawing its conclusions. Section 8 and Section 9 (015/SL/Doc8) examine recent build rates to understand the recent capacity of the house building industry to deliver the scale of growth planned for and the extent of change necessary to support this, particularly given recent low build rates. It would be illogical not to acknowledge or examine these factors. At no point is any assumption made that these represent any kind of limit of industry capacity as acknowledged in TAYplan Housing Provision Analysis Paper (2010) Paragraph 8.1 (015/SL/Doc73).

There is no evidence that land has been artificially constrained. The only circumstances that TAYplan is aware of where land is constrained is for reasons of infrastructure or environmental capacity. Such issues were investigated with Local Authorities and infrastructure providers prior to publication of the Main Issues Report. Although some locations in North Fife and Perthshire would be considered '*attractive*' by those seeking to build homes it does not automatically follow that these would deliver the objectives and wider policy framework of the Proposed Plan.

The assertion by **Geddes Consulting for Thomson Homes (445159) (PLAN887 and PLAN888)** that the house building figures in the TAYplan Housing Analysis Paper (2010) Page 20 Figure 15 are incorrect is not supported (015/SL/Doc76). The statistics in Figure 15 are based on the Housing Land Audits (2010) for each of the region's Local Authorities. **Homes for Scotland (442882)** and no other individual homebuilders have raised this as an issue in their representations. Initial consideration had been given to the Scottish Government's Housing Completions Statistics (as used by **Geddes Consulting for Thomson Homes (445159)** in their supporting Statement). However, these statistics do not include small sites and are based on NB1 and NB2 returns which in some cases double count housing association completions. Using two different sets of data from different sources is not considered a satisfactory basis on which to make such comparisons. Figure 15 shows that between 2003/04 and 2007/08 build rates were around the 2,000 homes per year mark, although in some years they were a little higher. The key issue, as considered in the TAYplan Housing Analysis Paper (2010) Section 9 (015/SL/Doc76), is the transition from the presently low build rates to those a little higher than before the recession and the nature of change required to support this.

**Geddes Consulting for Thomson Homes (445159) (PLAN887 and PLAN888); Homes for Scotland (442882); Dundas Estates & Development Co (548117); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Smiths Gore for Mansfield Estates (442870) and Errol Park Estate (442871); Montagu Evans for Wallace Land Investment Management (343111); and, Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Bett Homes Ltd (548523) and Stewart Milne Homes (548524)):** The suggestion that TAYplan fails to plan for growth because Topic Paper 2: Growth Strategy (June 2011) Paragraph 4.3 (015/SL/Doc82) mentions the recent reduction in government funding for affordable housing is incorrect. Paragraph 4.3 is an extract from the executive summary of the TAYplan Housing Analysis Paper (2010) (015/SL/Doc8), which examines a series of factors which influence build rates. It acknowledges there has been a reduction in Scottish Government funding for affordable housing and this will likely place greater pressure on individual registered social landlords and private house builders to provide affordable housing. This is not, as some respondents seem to imply, the sole reason for the build rates set out in Policy 5.

**Homes for Scotland (442882); Dundas Estates & Development Co (548117); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Halliday Fraser Munro for Barratt Homes (548389) (PLAN589); Smiths Gore for (Mansfield Estates (442870) and for Errol Park Estate (442871)); Montagu Evans for Wallace Land Investment Management (343111); Andrew McCafferty for GD Strawson & J Farquharson (548151) (PLAN440); and, Lomond Land (237724):** The suggestion that TAYplan fails to plan for growth because Topic Paper 2: Growth Strategy (June 2011) Paragraphs 4.8 (015/SL/Doc1) acknowledges the impacts that increased growth could have on the location priorities of the Proposed Plan is incorrect. Paragraph 4.8 is an extract from the executive summary of the TAYplan Housing Analysis Paper (2010) (015/SL/Doc8). It acknowledges the fact that the scale of growth will have some impact on the delivery of other aspects of the Proposed Plan, and if significant enough, could undermine them. Similarly allocating too little land would limit the opportunities to meet defined need and demand. The suggestion that Local Development Plans are capable of planning for higher levels of growth without adversely impacting on the location priorities of the Proposed Plan could be true in some instances. Policy 5 has already set out flexibilities to support the allocation of higher levels of land release to ensure the delivery of Policy 5 build rates. However, the key issue will remain the extent to which any development proposals comply with the wider policy framework of the Plan. Where these are met and the only issue is the amount of housing then Policy 5 does not prevent development. Critically though, Page 16 bullet point 4 acknowledges that irrespective of scale poor quality development shall be refused.

**Lomond Land (237724)**'s assertion that Topic Paper 2: Growth Strategy (2011) Paragraph 4.7 (015/SL/Doc25) presents no analysis on migration is correct. Topic Paper 2: Growth Strategy (2011) Paragraphs 4.2 to 4.11 (015/SL/Doc82) are the executive summary from the TAYplan Housing Analysis Paper (2010) (015/SL/Doc8). The analysis of migration is considered in Section 6 of that paper (015/SL/Doc75). Section 9 (015/SL/Doc76) and other sections consider the likely changes necessary to move from the present position to 2,170 homes per year or indeed 2,310 homes per year. In so doing they conclude 2,170 homes per year to be the most appropriate level to plan for.

**Barton Willmore for Scotia Homes (443109); Colliers International for Persimmon Homes Ltd (416017) (PLAN43) and Taylor Wimpey East Scotland (541486) (PLAN66); Dundas Estates & Development Co (548117); Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Angus Estates Ltd (445204); Bett Homes Ltd (548523); J G Lang & Son (445206) James Keiller Estates Ltd (445203); L Porter (548383); M Batchelor (K) (548301); M Batchelor (B) (548360); Mr R Watson (445205); and Stewart Milne Homes (548524)); Geddes Consulting for Thomson Homes (445159) (PLAN887 and PLAN888); GS Brown Construction (543112); GVA for David Wilson Homes (547268); Halliday Fraser Munro for Barratt Homes (548389) (PLAN589); Homes for Scotland (442882); Lomond Land (237724); Penelope Uprichard (344887) (PLAN873); Largo Area Community Council (450207); Montagu Evans for Wallace Land Investment Management (343111); Montgomery Forgan Associates for (Headon Developments (349140); for VGH (VICO Ltd/Bett Homes/Headon Devts) (349134) and for Taylor Wimpey (331497); Mr Ian Fowler (548055); Muir Group (450286) (PLAN180); Royal Burgh of St. Andrews Community Council (PLAN915); Smiths Gore for (Mansfield Estates (442870) and Errol Park Estate (442871)); Stewart Milne Homes (539251) (PLAN327 and PLAN328); and, TMS Planning for (Campion Homes (546491) (PLAN228 and PLAN233); Mr James Thomson (345005) (PLAN241 and PLAN247); Mr Simon Wilson (345007) (PLAN399 and PLAN404); Mr Tim Esparon (345006) (PLAN197 and PLAN210); and, Muir Homes Ltd (346675) (PLAN359 and PLAN366)):** Both the GROS 2006-based (015/SL/Doc4) and 2008-based (015/SL/Doc2) population and household projections formed part of the considerations covered by TAYplan-wide Housing Need and Demand Assessment (2010) Appendix 1 (015/SL/Doc80). These were presented as ranges in each of the two housing options at Main Issues Report stage (2010) on Page 20 (015/SL/Doc77). Neither set of projections is out of date. Both are an extrapolation of the most recent respective five year trends for the subsequent 25 years. They help in understanding the scale and nature of change but do not necessarily reflect what will happen, particularly where economic and policy factors intervene. The inference that the scale of house building should instead reflect the GROS 2008-based population and household projections (015/SL/Doc2) is not supported. Policy 5 build rates are based on the TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49) as wider strategic economic, social and environmental considerations, consistent with Scottish Planning Policy (2010) paragraph 70 (015/SL/Doc29).

The TAYplan Housing Analysis Paper (2011) Section 6 (015/SL/Doc75) sets out how the 2008-based projections (015/SL/Doc2) would see a continued fall in the population of Dundee City. The Proposed Plan seeks to prevent this outcome and so plans for a different set of circumstances which do not reflect past trend, as acknowledged in Scottish Planning Policy paragraph 70 (015/SL/Doc29). It may be possible that the scale of migration needed to deliver the population growth implied by the 2008-based projections can be reached at some point before 2024. However, this would need to occur as part of a 'journey' through the recovery to a stronger economy. If the average population growth rate is to be sustained for the whole of the first 12 years then economic and population growth would need to be extraordinarily high and very rapid in the early years of the Plan and then hold constant or be very significant and concentrated in the later years up to 2024.

Although the Proposed Plan sets out a framework to support sustainable economic growth and to allow for growth in house building, the switch from present levels of house building and demographic change to those implied by the 2008-based projections (015/SL/Doc2) will take time and rely on significant growth in the economy. It is for this reason that Page 16 paragraph 4 considers that levels of growth that are significantly higher than the implications of the GROS 2006-based (015/SL/Doc4) population and household projections to be undeliverable.

The scale of growth that is being planned for is broadly reflected in the 2006-based population and household projections (015/SL/Doc4), with the exception of Dundee City where Policy 5 plans for growth. These illustrate the possible extent of demographic change associated with the level of house growth planned for and assist in understanding the nature of change implied by planning for this scale of growth. These considerations are reinforced by the conclusions of the TAYplan Housing Analysis Paper (2010) (015/SL/Doc8) and the Housing Need and Demand Assessment (2010) (CL/Doc49). Such considerations are less evident in the representations proposing to increase or decrease build rates.

**Homes for Scotland (442882); Dundas Estates & Development Co (548117); Stewart Milne Homes (539251) (PLAN327 and PLAN328); Smiths Gore for (Mansfield Estates (442870) and Errol Park Estate (442871)); Montagu Evans for Wallace Land Investment Management (343111); and, Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522); Angus Estates Ltd (445204); Bett Homes Ltd (548523); J G Lang & Son (445206); James Keiller Estates Ltd (445203); L Porter (548383); M Batchelor (B) (548360); M Batchelor (K) (548301); Mr R Watson (445205); and Stewart Milne Homes (548524)):** The approach set out in the Proposed Plan also fulfils the intentions of both Firm Foundations (2007) (CL/Doc23) and National Planning Framework 2 (2009) (CL/Doc1) despite some suggestions that it does not. Both seek a growth in the population of Scotland and an increase in the level and quality of new homes being built. TAYplan shares this ambition as a component of delivering a better quality of life through sustainable economic growth, place shaping, improved resilience and tackling climate change. National Planning Framework 2 (CL/Doc1) also recognises the importance of towns and cities as economic drivers and as the focus for growth and regeneration, an approach that is reflected in Policies 1, 3, 4, 5, 6 and 7 and in the distribution of house building under Proposal 2.

**Royal Burgh of St. Andrews Community Council (453889 ) (PLAN923):** The proposal to change Page 16 Paragraph 6 words ‘...estimates that the recovery in demand would be complete...’ with ‘...suggests that the recovery in demand may be complete...’ is not considered to change what is meant by or add any greater clarity to what is already written.

TAYplan does not support a change to the scale of house building being planned for in Policy 5 and Proposal 2. Therefore TAYplan does not support changes to Page 16 Paragraph 6 to suggest the build rate being ‘somewhat lower’ for the 2024-32 period.

The Proposed changes to Page 16 Bullet Point 2 would substantially alter the meaning of this bullet point. As presently written it plans for the recovery in build rates at some point ‘within’ the period to, and, to have occurred ‘by’ 2024. The proposed modification could be interpreted to mean that these should be achieved annually within the 12 years, this is not the case. Accepting this proposed change would fundamentally affect the flexibilities and the implementation of Policy 5 by requiring this scale of build to be achieved every year rather than averaging this over the first 12 years. This could adversely impact on the delivery of Policies 1 and 3.

**Scottish Property Federation (444087):** The suggested support for growth of Dundee City appears to be contradicted by the implied modifications seeking growth in locations outside of the city and indeed the Dundee Core Area that are considered likely to fuel a growth in road based commuting. This is not consistent with the objectives of the Proposed Plan and is

contrary to Policy 1 and has the potential to adversely impact on Policy 3.

**Hargest Planning Ltd for MacDonald Estates Ltd (548948):** The Proposed Plan already identifies build rates for the first 12 years and second 8 years of the Plan Period for individual housing market areas in Policy 5 Part A Proposal 2. The proposed modification to increase build rates above 'the present 1,300 per year 2012-24' fundamentally misinterprets Policy 5 as written. The suggestions of three times period (two within the first 12 years) to reflect the transition through the recovery is accepted in principle. However, TAYplan does not wish to artificially stifle the recovery and recognises that it will progress at different paces in different localities at different times. Therefore Policy 5 requires Local Development Plans to allocate land capable of delivering the full 2,170 homes per year from the outset. Thus the build rate of 2,170 applies throughout the first 12 years of the Plan and, as acknowledged on Page 16 paragraph 5 the Strategic Development Plan will be reviewed by 2017. This approach was considered by the TAYplan Housing Provision Analysis Paper (2010) Section 9 (015/SL/Doc76).

It is also presumptuous to suggest that increasing the scale of building alone would result in such positive impacts on affordability. Affordability is only one component of market exclusion and the provision of affordable housing is only one part of the solution. Market exclusion is greatly dependent on a series of factors such as range of type, size and tenure of home, place quality and other issues including the availability of work, credit and the impacts of other financial demands upon households. The changes proposed are not considered to add further value or clarity to the Plan and are not supported.

### **CHANGE THE SCALE OF HOUSE BUILDING PLANNED IN AN AREA WITHIN THE REGION**

- A. Increase the scale of house building being planned for in an area;**
- B. Decrease the scale of house building being planned for in an area; and,**
- C. Increase the scale of house building being planned for in an area and decrease it in another by a corresponding level**

**Forward Coupar Angus (543145); Dr Peter Symon (548525); Colliers International for Persimmon Homes Ltd (416017) (PLAN44) and for Taylor Wimpey East Scotland (541486) (PLAN67)); Hargest Planning Ltd for MacDonald Estates Ltd (548948); Stuart Buchanan for Rossco Properties (442290); Muir Smith Evans for Muir Homes Ltd (548051); GVA for David Wilson Homes (547268); Halliday Fraser Munro for Barratt Homes (548389) (PLAN588); Kinross-shire Civic Trust (546838); Councillor Michael A Barnacle (450613); Mr Ken Miles (548486); Mr Stewart McKiddie (344874); Mrs Anne Tynte-Irvine (543388); Victoria Riley (543976); Mr John Riley (544468); Penelope Uprichard (344887) (PLAN873 and PLAN879); Mrs Marion Lang (548408); Mrs Jennifer Byrne (545391); Largo Area Community Council (450207) and Kingsbarns Community Council (263542); Ryden for Bon Accord Land Ltd/Stewart Milne Homes (330884); and, Royal Burgh of St. Andrews Community Council (453889) (PLAN924):** Proposals to modify the build rates for individual Housing Market Areas up or down are, by default, proposing a change to regional build rates; except where they have specified a redistribution that maintains regional build rates. By doing so they compromise the conclusions of the TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49) and the wider strategic economic, social and environmental considerations as already described above. Increases have often been proposed in localities where the respondents appear to have commercial interests. Similarly those seeking a reduction appear to be doing so through opposition to proposed development in their locality. These alone are not logical or justifiable reasons to change the build rate. However, the flexibilities set out in Policy 5 mean that some of these locations may be able to come forward, provided that they meet other requirements of the Proposed Plan as well as appropriate Local Development Plan considerations. Any reduction in build rates brings with it some risk that the need and demand for market and affordable housing identified in the

TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49) will not be met. However, it is possible for up to 10% of the build rate to be accommodated in one or more neighbouring housing market areas within the same local authority in exceptional cases of environmental capacity as set out in Policy 5 Part A Bullet Point 1.

Alternative Strategic Development Areas and additional proposals for Principal Settlements have been considered in Schedule 4s for Issue 013: Policy 4: Strategic Development Areas – Alternative Sites and for Issue 003 Policy 1: Location Priorities - Settlements.

**Royal Burgh of St. Andrews Community Council (453889) (PLAN924)** The suggestion that build rates should increase within the Cupar Housing Market Area to accommodate the Cupar North Strategic Development Area by 2024 are not accepted. The Strategic Development Areas are planned now and will be delivered either wholly or partly during the 2012-32 plan period. This will not preclude the release of other smaller sites within Housing Market Areas which also have Strategic Development Areas. The flexibilities already set out in Policy 5 and on Page 16 also support this. Such a change would therefore be unnecessary and could lead to unnecessary pressure for development, particularly outside of Principal Settlements; this could adversely affect the delivery of Policy 1 and Policy 3.

**Mr Stewart McKiddie (344874); Mrs Anne Tynte-Irvine (543388); Victoria Riley (543976); Mr John Riley (544468); Penelope Uprichard (344887) (PLAN873 and PLAN879); Mrs Marion Lang (548408); Mrs Jennifer Byrne (545391); Largo Area Community Council (450207); and, Kingsbarns Community Council (263542):** Several respondents raise the potential use of RAF Leuchars as an alternative to the Strategic Development Area at St Andrews West and Science Park or suggest its closure could reduce housing demand. These representations predate the announcement by the Secretary of State for Defence on 18 July 2011 (CL/Doc64) that RAF Leuchars will close as an RAF station and transfer to the British Army to base two units of and the headquarters for one of the five new multi-role brigades. The gap between the RAF leaving and the Army arriving will affect housing demand in the area. Departing RAF personnel selling properties may well do so prior to the arrival of Army personnel who may otherwise have purchased them. The St. Andrews West and Science Park Strategic Development Area could provide one source of off-base housing within the locality. (This issue is considered further in Schedule 4 Issue 012 Policy 4: Strategic Development Areas – Policy 4 Part A Strategic Allocations and Schedule 4 Issue 013 Policy 4: Strategic Development Areas – Alternative Sites)

**Ryden for Bon Accord Land Ltd/Stewart Milne Homes (330884)** Little evidence is provided for the proposed modifications to increase build rates for North Angus Housing Market Area and correspondingly decrease them for Highland Perthshire and for Cupar and North West Fife Housing Market Areas. This risks failing to provide for identified need and demand and is contrary to Policy 5 Part A Bullet 1 and Scottish Planning Policy (2010) paragraph 71 (015/SL/Doc30); regarding the transfer of house building rates between Housing Market Areas only within the same local authority and only in exceptional cases of environmental capacity. The scale and location of growth to be focussed in Montrose is a matter for the Local Development Plan based on a series of social, environmental and economic considerations. Should the Montrose Port Strategic Development Area be successful to the extent that it requires more substantial growth in Montrose itself the existing flexibilities in the Proposed Plan would support this. However, substantially more house building cannot not be predicated on the basis of proximity between commercial interests and a Strategic Development Area. Similarly the housing need and demand identified for Highland Perthshire and Cupar and North West Fife Housing Market Areas cannot logically be met in North Angus Housing Market Area as neither share boundaries.

**Dr Peter Symon (548525)** Proposals to increase house building rates for Dundee City are already satisfactorily covered by Policy 5 Part B and other flexibilities within the Policy 5 and identified on Page 16. These explain that the Dundee City Local Development Plan can plan for growth levels that exceed the level of provision in Proposal 2, and indeed fulfil other aspects of the Plan. This is because provided the other elements of the Proposed Plan are fulfilled the scale of growth for Dundee City are the largest settlement in the region are consistent with the locational principles of the Plan.

### **FORMAT AND CLARITY**

#### **A. Annual build rates**

**Colliers International for Persimmon Homes Ltd (416017) (PLAN46) and for Taylor Wimpey East Scotland (541486) (PLAN69):** The 'robust and credible' TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49) used data from the 2008 Housing Land Audits as this was the most up to date at the time. The TAYplan Housing Analysis Paper (2010) considered data from both the 2008 and 2010 Local Authority Housing Land Audits. Section 9 (015/SL/Doc76) considered the 2010 Housing Land Audit Data to help understand the trajectory of the 'journey' from presently low build rates to rates of 2,170 and 2,310 per year. The principle use of the Housing Land Audits will need to be in determining what additional housing allocations will need to be made by Local Development Plans. This has been considered in Schedule 4 Summary of Unresolved Issues for Issue 016 Policy 5: Housing – Policy 5 Part A Effectiveness of Land.

**Muir Group (450286) (PLAN168) and Ryden for Bon Accord Land Ltd/Stewart Milne Homes (330884):** The explanations within Page 16 Supporting Text, Policy 5 and Page 17 footnote are appropriate and adequate. They explain firstly that the annual figures for the period up to 2024 will vary from year to year and that the nature of the market means that it is expected that the higher build rates will be later in the period and that these have greater potential to exceed the average in these later years. The total monitoring period is the first twelve year and 'not annually' therefore where the overall average build rates for the first twelve years falls below the planned average these do not carry over and a low average in one particular year does not require additional land release because build rates will vary from year to year. The outcome of the changes proposed would suggest that the monitoring period is the individual year. In years when build rates fall below the average level this could be used to argue that sites in inappropriate locations that fail to deliver the objectives of the Proposed Plan should be permitted simply because in some years the level of build differs from others. This would compromise the objectives and Policy 1 and potentially adversely impact on the delivery of Policy 2, Policy 3, Policy 5 Part A Proposal 2 and Policy 5 Part C. There is already sufficient flexibility in Policy 5 to enable other sites to come forward where they are consistent with the other parts of the Proposed Plan.

#### **B. Format of policy**

**Halliday Fraser Munro for Barratt Homes (548389) (PLAN588) and Geddes Consulting for Thomson Homes (445159) (PLAN893):** Proposals to remove the diagram from Proposal 2 and replace it with a table do not reflect the move to more map based and diagrammatic Development Plans under the Planning etc (Scotland) Act 2006 (CL/Doc17), which has been expressed throughout the Proposed Plan. The removal of housing market area figures would also detract from the delivery of the Location Priorities because it is these that allow the Proposed Plan to explain the distribution of housing development. Presenting these annual figures at this scale is considered to be more easily understood by a wider range of users and has received positive feedback from attendees at Information Events held during the period for representations.

This is also fundamental in considering the Dundee Core Area in particular, which covers more than one local authority and more than one housing market area. Also, the figures were expressed this way at Main Issues Report (2010) stage. Feedback through the consultation made it clear that this assisted community groups and members of the public, in particular, to better understand the proposed scale of house building in their area. The considerations about how best to express this are set out in Topic Paper 2: Growth Strategy (June 2011) Section 5.

**Geddes Consulting for Thomson Homes (445159) (PLAN887; PLAN888 and PLAN893):**

Supporting Statement appears to blur the issues of responding to Scottish Planning Policy (2010) Paragraph 72 (015/SL/Doc14) requirement to indicate the shortfall of effective land and the proposed change for 2,310 homes per year. In so doing this simply populates a table with 2,310 homes per year distributed amongst the different Housing Market Areas of the region and estimates the likely shortfall of effective housing land based on 2010 Housing Land Audits. Neither arguments provides justification for the other. Issues regarding the allocation of land to year 7 have been considered in Schedule 4 Summary of Unresolved Issues Issue 016 Policy 5: Housing – Policy 5 Part A Effectiveness of land.

**Scottish Government (443918) (PLAN640):** Scottish Planning Policy (2010) paragraph 71 (015/SL/Doc30) explains the purpose of a generous supply of housing land. In effect the definition is a supply which is capable of leading to the outcomes set out in that paragraph. This will vary for different housing market areas. There is no additional value in repeating this but the Page 16 Supporting Text and Policy 5 explain the various flexibilities that have been set out to facilitate a generous land supply to achieve the requirements of Scottish Planning Policy (2010) paragraphs 66 and 72 (015/SL/Doc19). It is for Local Development Plans to determine the appropriate scale and location required to deliver this. Repetition of Scottish Planning Policy (2010) (CL/Doc2) or other elements already covered by the Proposed Plan would detract from the requirements of Circular 1/2009 Page 4 Paragraph 14 (015/SL/Doc67) to be visionary and concise.

### **C. Linkages to elsewhere in the Proposed Strategic Development Plan**

**Scottish Government (443918) (PLAN640):** The link between Policy 4 and Policy 5 is explained in the footnote on Page 17 beneath Policy 5 which explains that '*These figures [those in Policy 5 and Proposal 2] include Strategic Development Areas and affordable housing*'. This is clear that the figures in Policy 4 and indeed for affordable housing are part of rather than additional to those in Policy 5 and Proposal 2.

### **D. Elements of Policy coverage**

**Scottish Government (443918) (PLAN661):** Scottish Planning Policy (2010) paragraphs 89, 90 and 91 (015/SL/Doc19) are already clear on the requirements of Development Plans and Local Housing Strategies regarding Gypsies and Travellers and the proposed modifications appear to repeat these. The Proposed Plan does not cover specific groups but instead requires Local Development Plans to provide for a mix of housing type, size and tenures to meet the needs and aspirations of a range of different household. This includes all groups of society. It is for Local Development Plans to determine the scale of accommodation that needs to be planned for based on their Housing Need and Demand Assessments and what sites will be most appropriate. No further clarity is considered necessary.

## **RESPONSES TO REPRESENTATIONS IN SUPPORT**

**Loch Lomond and the Trossachs National Park Authority (442806); Auchterarder and District Community Council (419429); Lynne Palmer (443979); Braes of the Carse Conservation Group (423150); Montagu Evans for Inverarity Farms Ltd (443912); Montagu Evans (444081); Montgomery Forgan Associates for Strategic Land (Scotland) Ltd (442083); and, Inchtute Areas Community Council (445299):** Support is welcomed.

***Savills for Pilkington Trust (547933) and Bidwells for Zurich Assurance Ltd (442149):***

Support is welcomed and issues relating to specific Strategic Development Areas are considered in Schedule 4 Summary of Unresolved Issues Issue 012: Policy 4: Strategic Development Areas – Part A Strategic Allocations.

***Montgomery Forgan Associates for Morris Leslie Group (445161):*** Support is welcomed and whilst it is noted that although Perth Airport is within the Perth Core Area proposals would be determined against any development policies in the approved Strategic and Local Development Plans.

***Muir Smith Evans for Muir Homes Ltd (548051):*** Support is welcomed although it should be stressed the boundary of what constitutes Muirhead, and indeed other parts of the Dundee and Perth Core Areas, is a matter for the Local Development Plan. Settlement development boundaries around Muirhead are presently drawn very tightly in the Angus Local Plan Review (2009) (015/SL/Doc66). Whether this and other settlement 'boundaries' are changed will be considered through Local Development Plans.

## **CONCLUSIONS**

The arguments put forward for both increases and decreases in the overall build rates and those for individual Housing Market Areas fail to address or properly consider issues that have already been considered in the TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49), the TAYplan Housing Analysis Paper (2010) (015/SL/Doc8) and other studies and analyses. The TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49) has been declared robust and credible and as such its methodology is not an issue for debate at the examination (Page 7 of The Scottish Government's Housing Need and Demand Assessment Guidance (March 2008) (015/SL/Doc68)). Accepting any of the arguments and modifications put forward would undermine the Plan and lead to an incoherent and inconsistent position that would result in a flawed Plan.

As written Policy 5 plans for an appropriate scale of development with flexibilities allowing for a generous supply of effective housing land to ensure its delivery within the plan period 2012-32. Increasing overall build rates, or those of specific housing market areas, along with the flexibilities already set out introduces the potential for a more substantial land supply to be allocated. This could result in even higher build rates which are distributed in such a way that popular area find themselves under greater pressure to accommodate development, sometimes to the detriment of their environment or infrastructure capacity. Conversely other less popular areas, partially as a result of this, would struggle to deliver important regeneration or meet identified need and demand. Policy 5 is therefore considered to meet this fine balance of wider strategic economic, social and environmental considerations and reflecting the conclusions of the TAYplan-wide Housing Need and Demand Assessment (2010) (CL/Doc49). The proposed changes set out fail to adequately examine or justify this range of considerations and impacts. Many of the respondents are focussing on the numbers of outputs and seeing this as central to the Plan; the Plan's focus is on delivering sustainable economic growth through place shaping and responding to the Climate Change (Scotland) Act 2009 (CL/Doc13).

The scale of growth in Policy 5 is not, as some suggest, conservative or cautious; it is generous and offers a 'business ready' approach from the outset.

- The regional build rates are targets; not precise final outputs and these are higher than average build rates during the 'economic boom' period of the early 21<sup>st</sup> century. Considering that build rates are presently very low and must again increase through the recovery this rate is ambitious and offers optimism and certainty.
- Far from making assumptions about the pace of recovery the Proposed Plan sets out a framework about 'being ready for business from the start'. Local Development Plans

therefore need to identify the full amount of land required to deliver these build rates from the outset.

- There are appropriate flexibilities in place to ensure that Local Development Plans can allocate additional land to ensure there is a choice of effective housing land to deliver the build rates set out in Policy 5/Proposal 2. Critically though, these flexibilities are about ensuring that the scale of development planned for can be delivered rather than, as some suggest, pushing for an uncoordinated, higher rate of growth.
- The distribution of house building set out in Proposal 2 ensures that Policies 1, 2 and 3 can deliver the location priorities and place shaping requirements of the Proposed Plan and the requirements of the TAYplan-wide Housing Need and Demand Assessment (2010).
- Good quality development, as set out in Policy 2, which meets the objectives of the Plan should be supported even if it exceeds the scale of growth in Policy 5; because the critical issue is delivering the vision and objectives. Poor quality development should be refused whatever the scale.

This approach provides clarity and certainty of what is expected and what will not be accepted. It is for developers to provide the mix of housing type, size and tenure necessary to meet the needs and aspirations of different households throughout their lives and ensure that the location, design and layout of development reflects all aspects of the Strategic Development Plan.

The Proposed Plan is not in the style of previous Structure Plans, being entwined in precise numbers and tables, as explained in Topic Paper 2: Growth Strategy (June 2010) Section 5 (015/SL/Doc83). Instead it uses a mixture of quantitative and qualitative analysis to understand the implications of land availability and demographic and other changes that will take place or will need to take place, and ultimately what these mean for the strategy in the wider social, economic and environmental context. This is clear, robust and credible, and above all, consistent with delivering the requirements of Scottish Planning Policy (2010) paragraphs 66 to 91 (015/SL/Doc19) and the contextual requirements of the TAYplan region. The Proposed Plan does not start from a blank page as there has, as anywhere, been a legacy of development decisions, issues and policy. Similarly some of the objectives and approaches in present Structure Plans remain relevant and are expressed in the Proposed Plan; however, this brings greater coherence as TAYplan covers an area with one strategic plan where once there were three. The Proposed Plan is concise and visionary (Circular 1/2009, Page 4 Paragraph 14 (015/SL/Doc67)), diagrammatic and light touch but principally focussed on delivering a series of interdependent objectives. The removal or replacement of maps and diagrams with tables would detract from this.

Policy 5 provides house building targets and flexibility ensuring a generous supply of housing land required to help the area grow and support wider objectives relating to sustainable development and a better quality of life for the region's people. Increasing significantly the scale could undermine this as will significantly decreasing it. Delivery rates will instead vary from year to year (as they already do – see Monitoring Statement (2010) Figure 4.22 Page 38 (015/SL/Doc78)) and it will be the role of monitoring to determine whether this scale of variation is consistent or compromising to the strategy.

The approach already set out within Policy 5 Part A, Proposal and on Page 16 Supporting Text provides appropriate flexibility in delivering housing which fits well with other objectives of the Proposed Plan and is consistent with Scottish Planning Policy (2010) (CL/Doc2) and Planning Advice Note 2/2010 (015/SL/Doc9). TAYplan considers that the proposed modifications would reduce the clarity, certainty and coherence that is presently provided to users of the Plan; they would also undermine many Policy 5 and other policies that are specifically set out to deliver the vision and objectives of the Proposed Plan. Several proposed changes would unnecessarily repeat national policy and guidance or add superfluous text.

Therefore TAYplan considers the Policy is consistent with Scottish Planning Policy (2010) (CL/Doc2) and that all of the issues raised do not warrant any change to the Proposed Plan (June 2011) and propose that the elements dealt with in this Schedule 4 Summary of Unresolved Issues remain as written and unchanged.

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

[Note: For DPEA use only.]

## **2. Copy of representations pertinent to this issue**

**3. Library of documents and extracts (less than 50 pages) referred to within representations and/or this Schedule**