

<b>Issue (ref and heading):</b>	Issue 016: Policy 4 Homes - Annual Housing Supply Targets and Housing Land Requirements – Perth & Kinross	
<b>Development plan reference:</b>	Policy 4 Part A/Map 4 and supporting text, pages 24 and 25	<b>Reporter:</b> [For DPEA use only]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p><b>Seeking a change</b>  Emac Planning LLP for A&amp;J Stephen Ltd &amp; Avant Homes (910368)  Emac Planning LLP for Delson Contracts Ltd (846826)  Emac Planning LLP for F M &amp; G Batchelor (846821)  Emac Planning LLP for J G Lang &amp; Son (846827)  Emac Planning LLP for Landvest PCC Ltd (910292)  Emac Planning LLP for Linlathen Estates (Tayside) Ltd &amp; James Keiller Estates Ltd (846825)  Emac Planning LLP for R Watson &amp; Son (846824)</p>	<p>Emac Planning LLP for Scotia Homes Ltd (910294)  Emac Planning LLP for Stewart Milne Homes North Scotland (347277)  Homes For Scotland (785148)  Montagu Evans LLP for Wallace Land Investment Management (343111)</p> <p><b>Supporting as written</b>  Colliers International for Scottish Enterprise (835481)  NHS Tayside (908896)  Savills for The Pilkington Trust &amp; Stewart Milne Group (904840)  Scottish Water (762198)</p>	
<b>Provision of the development plan to which the issue relates:</b>		
<p>Policy 4A and Map 4 work in conjunction setting out the housing supply targets (how much housing is planned to be built) and housing land requirement (the amount of land to be provided to deliver this). Map 4 presents these at TAYplan level, for each housing market area and for the constituent council areas within TAYplan. The Greater Dundee Housing Market Area is the only housing market area to cover part(s) of more than one council area. Here the figures are set out for each constituent council area to provide clarity for the respective Local Development Plans. This Schedule relates specifically to Perth &amp; Kinross.</p>		
<b>Planning Authority's summary of the representation(s):</b>		
<p>Note to Reporter  For clarity Dundee City is the same as Dundee City Council's administrative area. This is one part (the largest part) of the Greater Dundee Housing Market Area. The Greater Dundee Housing Market Area is bigger than Dundee City and covers all of Dundee City and some parts of all three local authorities which surround it. The Perth &amp; Kinross part of the Greater Dundee Housing Market Area includes the settlements of Invergowrie. This is part of the Dundee Core Area and is a principal settlement (see Policy 1 Part A). There are also some smaller settlements within this area that are not principal settlements and are not part of the Dundee Core Area in Policy 1 Part A. Topic Paper 2: Growth Strategy (2015) pages 39 to 42 (Doc104)</p>		
<p><b>Summary of Representations Seeking a change</b></p> <p><b><u>SEEK INCREASE IN PERTH &amp; KINROSS HOUSING SUPPLY TARGETS</u></b></p> <p><b>Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_533 and Montagu Evans LLP for Wallace Land Investment Management (343111) PLAN2015_249</b> propose an increase in the Housing Supply Targets for Perth &amp; Kinross to represent 100% of the identified need and demand for new homes set out in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 5 pages 219 (Doc97). <b>Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_533</b> acknowledge the 'jump in completions that will be required' but they wish to see a principle for this established across Scotland.</p>		

**Note to Reporter:** 100% of identified need and demand for new homes from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) for Perth & Kinross became Main Issue 5 Option 2 in the TAYplan Main Issues Report (2014) pages 29 and 30 (Doc56).

## **SEEK INCREASE IN PERTH & KIRNOSS HOUSING LAND REQUIREMENT**

### **A) Seek Increase to 10% generosity margin**

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015\_553, Homes For Scotland (785148) PLAN2015\_239, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_404, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_518, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_494, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_465, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_482, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_441 and Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_431** propose an increase in the housing land requirement for Perth & Kinross from being the same as the housing supply target in Map 4 to being 10% higher to provide for a generous supply of housing land. This is justified on the basis of Scottish Planning Policy (2014) Paragraph 116 (Doc84). They also note that what they describe as 'no generosity' in Perth & Kinross results in only 5% generosity at the TAYplan level.

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015\_553, Homes For Scotland (785148) PLAN2015\_239 and Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015\_533** each considers that their proposed increase in the housing land requirement would 'increase the likelihood of the housing supply target being met'.

**Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_404, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_518, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_494, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_465, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_482, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_441 and Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_431** each acknowledge that the exact extent of the margin of generosity will 'depend on local circumstances, but a robust explanation for it should be provided in the plan' as set out in Scottish Planning Policy (2014) paragraph 116 (Doc84).

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015\_553, Homes For Scotland (785148) PLAN2015\_239, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_404, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_518, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_494, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_465, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_482, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_441 and Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_431** do not seek changes to the housing supply targets for Perth & Kinross that are set out in Map 4.

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015\_553 and Homes For Scotland (785148) PLAN2015\_239** specifically accept planning for housing supply targets that are 90% of identified need and demand for Perth & Kinross (as set out in Main Issues Report (2014) Option 1 pages 29 and 30 (Doc56)). This is based on the arguments presented in the TAYplan Housing Analysis Paper (2015) pages 13 to 18 and Figures 4 and 5 (Doc100). The

respondents consider this to reflect Scottish Planning Policy (2014) Paragraph 115 (Doc84) and therefore, on this basis, would not wish to see the housing supply target fall as a means to achieve a higher generosity margin.

### **B) Seek Increase to 10-20% generosity margin**

#### **Emac Planning LLP for Stewart Milne Homes North Scotland (347277)**

**PLAN2015\_533** seeks an increase in the generosity of housing land requirement for Perth & Kinross from 0% to 10-20%. This is proposed on the basis of Scottish Planning Policy (2014) Paragraph 116 (Doc84) and to 'increase the likelihood of the housing supply targets being met'. They also suggest that 'no generosity' in Map 4 for Perth & Kinross results in only 5% generosity at the TAYplan level. They seek this increase because they wish to see a principle established across Scotland for this and the associated generosity of at least 10%. This increase in the generosity margin would be applied to the increase in the housing supply targets proposed by this respondent above.

### **Summary of Supporting Representations**

**Colliers International for Scottish Enterprise (835481) PLAN2015\_370** supports all of Policy 4 (Doc80) as the basis for the identification of housing land as consistent with Scottish Planning Policy (2014) paragraphs 110, 123 and 125 (Doc84). They also support the role of the Strategic Development Areas (Policy 3 - Doc80) in contributing to an effective housing land supply.

**NHS Tayside (908896) PLAN2015\_325** consider that the ability to be 'flexible' and 'respond to changes in terms of Housing Need and Demand Assessment' is important and recognises that 'population projections are not always reliable'.

**Savills for The Pilkington Trust & Stewart Milne Group (904840) PLAN2015\_255** supports Policy 4 including the housing supply targets and land requirements. They consider the approach set out to reflect Scottish Planning Policy (2014) (Doc84). They also make particular reference to land at Almond Valley, where they have an interest, which forms part of the West/North West Perth Strategic Development Area set out in Proposed Plan (2015) Policy 3 (Doc80). They note in particular the contribution they consider this site will make to the housing land requirement in the Greater Perth Housing Market Area.

**Scottish Water (762198) PLAN2015\_269** supports this policy and reinforces its duty as an infrastructure provider to support the delivery of this.

**Modifications sought by those submitting representations:****Summary of Representations Seeking a change****SEEK INCREASE IN PERTH & KINROSS HOUSING SUPPLY TARGETS**

**Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015\_533 and Montagu Evans LLP for Wallace Land Investment Management (343111) PLAN2015\_249** propose changing the housing supply targets in Policy 4A/Map 4 for Perth & Kinross to those set out below:

Area	Proposed Increase in Housing Supply Target
Highland Perthshire	100
Strathearn	150
Strathmore & Glens	160
Greater Perth	620
Kinross	80
Perth & Kinross part of Greater Dundee Housing Market Area	5
<b>Perth &amp; Kinross</b>	<b>1,115</b>

Figures are average annual figures for the years 2016-28

**SEEK INCREASE IN PERTH & KIRNOSS HOUSING LAND REQUIREMENT****A) Seek Increase to 10% generosity margin**

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015\_553, Homes For Scotland (785148) PLAN2015\_239, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_404, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_518, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_494, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_441, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_431, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_465 and Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_482** each propose changing the housing land requirement figures for Perth & Kinross set out in Policy 4A/Map 4 to those set out below:

Area	No change to Housing Supply Target	Proposed Increase in Housing Land Requirement of 10%
Highland Perthshire	90	99
Strathearn	135	149
Strathmore & Glens	145	160
Greater Perth	555	611
Kinross	70	77
Perth & Kinross part of Greater Dundee Housing Market Area	5	6
<b>Perth &amp; Kinross</b>	<b>1,000</b>	<b>1,100</b>

Figures are average annual figures for the years 2016-28

**B) Seek Increase to 10-20% generosity margin**

**Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015\_533** propose changing the housing land requirement in Policy 4/Map 4 (Doc80) for Perth & Kinross to those set out below/overleaf (these are 10% to 20% higher than the housing supply targets proposed by this respondent above):

Area	Proposed Increase Housing Supply Target (based on other changes sought by this respondent – above)	Proposed Increase in Housing Land Requirement of 10% to 20%
Highland Perthshire	100	110-120
Strathearn	150	165-180
Strathmore & Glens	160	176-192
Greater Perth	620	682-744
Kinross	80	88-96
Perth & Kinross part of Greater Dundee Housing Market Area	5	6-6
<b>Perth &amp; Kinross</b>	<b>1,115</b>	<b>1,227-1,338</b>

Figures are average annual figures for the years 2016-28

### Summary of responses (including reasons) by Planning Authority:

#### Context

The TAYplan-wide Joint Housing Need and Demand Assessment (2013) was declared 'robust and credible' by the Centre for Housing Market Analysis on 24 February 2014 (Doc54). Homes for Scotland (785148) and others with an interest in housing were offered the opportunity to comment on the methodology for the exercise and later on a draft of the document. A summary of the general involvement in this process and the bodies involved are set out in TAYplan-wide Joint Housing Need and Demand Assessment (2013) Appendix 4 (Doc97). Appendix 3 (Doc97) details the role of different groups and those individuals and organisations involved.

The TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 5 Figure 5.5 on page 199 (Doc97) concludes that the identified need and demand for new homes for Angus, Dundee City and North Fife is less than currently planned for in approved TAYplan (2012) Policy 5 (Doc16). For Perth & Kinross it is higher.

This meant that the Perth & Kinross build rates planned for in approved TAYplan (2012) Policy 5 (Doc16) represented almost 80% of the total identified need and demand for new homes in the subsequent TAYplan-wide Joint Housing Need and Demand Assessment (2013) page 219 (Doc97).

Continuing to plan for approved TAYplan (2012) Policy 5 (Doc16) build rates would therefore mean not planning for one fifth of identified need and demand for new homes. This was not considered to be a reasonable option at Main Issues Report stage in 2014. However, TAYplan was aware that the scale of the transition from currently low build rates to those of identified need and demand for new homes in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) page 219 (Doc97). TAYplan was also aware of the associated wider economic, social and environmental factors and capacity, resource and delivery issues that would govern this transition.

At Main Issues Report stage TAYplan therefore considered that planning for 90% of the identified need and demand for new homes recognised the need to balance ambitions for growth with the practical realities of economic recovery and the resource and delivery implications of the transition to higher build rates. These practicalities are considered further in Topic Paper 2: Growth (2015) pages 33 to 39 (Doc104) and the TAYplan Housing Analysis Paper (2015) pages 13 to 24 (Doc100). The Main Issues Report was then approved by the TAYplan Joint Committee in February 2014 and the consultation ran from April to June 2014.

The TAYplan Main Issues Report (2014) consulted on two housing options (pages 29 to 30 – Doc56). The only difference between these was the scale of homes planned for in Perth & Kinross. Option 1 (the preferred option) was 90% of identified need and

demand for new homes from the TAYplan-wide Joint Housing Need and Demand Assessment. Option 2 was for 100%. Option 1 was the preferred option because it recognised the practicalities associated with capacity, resources and deliverability (described above) as well as the wider economic, social and environmental factors that continue to be described by Scottish Planning Policy (2014) paragraph 115 (Doc84).

The TAYplan Housing Analysis Paper (2015) (Doc100) considered additional information following the Main Issues stage to understand the factors influencing how many new homes to plan for. The purpose of this was to be open and transparent about the information and analysis on which TAYplan based its decision. This included the newly published 2012-based population and household projections, which were not available at TAYplan level until after the Main Issues Report (2014) consultation. These and other information were used to 'sense test' the work for the Main Issues Report Options (Doc56) as explained in TAYplan Housing Analysis Paper (2015) pages 25 to 41 (Doc100). The evidence cited in TAYplan Housing Analysis Paper (2015) (Doc100) persuaded TAYplan that it was most logical and realistic to plan for Main Issues Report Option 1 (Doc56) and this now forms Proposed Plan (2015) Policy 4/Map 4 (Doc80). This is reinforced by the factors described in the TAYplan Economic Outlook (2014) pages 32 to 36 (Doc98).

Scottish Planning Policy (2014) (Doc84) was published in the final week of the Main Issues Report consultation in 2014. It has been fully considered in the preparation of the TAYplan Housing Analysis Paper (2015) and the subsequent Proposed Plan.

Proposed Plan (2015) has used the evidence requirements stated in Scottish Planning Policy (2014) paragraph 115 (Doc84) to justify housing supply targets in the TAYplan Housing Analysis Paper (2015) (Doc100). These also have relevance for the housing land requirements.

The approved TAYplan (2012) Policy 5 (Doc16) already includes an approach to generosity which is similar to the housing land requirement approach. The supporting text for approved TAYplan (2012) Policy 5 on page 16 (Doc16) directs Local Development Plans to identify a supply of land larger than the house building targets in Policy 5 (Doc16) to ensure that there is enough land. However, the specific scale was a matter for Councils based on local circumstances.

As a consequence of Scottish Planning Policy (2014) paragraph 116 (Doc84) the Proposed Plan (2015) Policy 4 (Doc80) has set out and clearly distinguished between housing supply targets and housing land requirements. The TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100) explain the technical evidence and policy thinking which justifies these.

## **Authority's Response to Proposed Changes**

### **SEEK INCREASE IN PERTH & KINROSS HOUSING SUPPLY TARGETS**

**Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015\_533 and Montagu Evans LLP for Wallace Land Investment Management (343111) PLAN2015\_249**

As noted above in the context section TAYplan's preferred option at Main Issues stage (Doc56) was to plan for 90% of the identified need and demand for new homes in Perth & Kinross from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 5 page 219 (Doc97). TAYplan's preferred Option also included the transfer of 35 homes per year from the Perth & Kinross part of the Greater Dundee Housing Market Area to Dundee City as explained in Topic Paper 2: Growth (2015) pages 39 to 44 (Doc104). TAYplan considered Option 1 to best reflect the evidence regarding the practicalities of the transition from currently low to higher

build rates and balance these with ambitions for growth. Given these issues Option 1 was also considered to be more realistic than Option 2. This evidence was presented in the earlier version Topic Paper 2: Growth (2014) pages 39 to 44 (Doc104) which was published alongside the Main Issues Report in April 2014.

Further work after Main Issues Report (2014) stage showed that this situation had not changed and that the transition to higher build rates remained significant for both Main Issues Report (2014) Options for new homes (Doc56). This is presented in the TAYplan Housing Analysis Paper (2015) pages 13 to 19 in Figures 4 and 5 (Doc100). Several other respondents specifically cite this as persuading them to seek no changes to the housing supply target in Map 4.

Further analysis in the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100) considered the implications of the 2012-based population and household projections. These showed that planning for Main Issues Report (2014) Option 2 (100% of identified need and demand for Perth & Kinross) (Doc56) would now be the consequence of far higher levels of migration than even the 2012-based projections high migration scenario.

This is inconsistent with the original assumptions which underpinned the TAYplan-wide Joint Housing Need and Demand Assessment (2013) - discussed in Chapter 2 (pages 131 to 144) and Chapter 5 (Pages 189 to 192) (Doc97). It is also considered unlikely by the TAYplan Economic Outlook Study (2014) by Oxford Economics (pages 32 to 36 – Doc98). New information presented on pages 13 to 24 of the TAYplan Housing Analysis Paper (2015) (Doc100) suggested that the evidence for the economic and market assumptions had not changed in a way that compromised the original basis for the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97). The analysis of the 2012-based projections also more strongly reinforced to TAYplan that the original conclusions supporting the preferred Main Issues Report (2014) Option 1 (pages 29 to 30 –Doc56) remained appropriate and relevant. They further reinforced the greater likelihood that Main Issues Report (2014) Option 2 (pages 29 to 30 – Doc56) was unrealistic.

The respondent's proposal to 'establish a principle across Scotland' that the housing need and demand assessment output should automatically become the housing supply target has the potential to conflict with the important wider factors considered by Scottish Planning Policy (2014) paragraph 115 (Doc84). It is this paragraph which establishes 'a principle across Scotland' for how to consider housing supply targets. The respondent has also failed to provide any additional robust or compelling evidence to refute that presented by TAYplan regarding the wider economic, social and environmental factors, capacity, resources and deliverability.

Scottish Planning Policy (2014) (Doc84) was published in the closing days of the Main Issues Report (2014) (Doc56) consultation. Paragraph 115 (Doc84) clarifies that the housing supply targets is a policy view of the number of homes to be planned for taking into account wider economic, social and environmental factors, issues of capacity, resource and deliverability. It should also reflect the respective housing need and demand assessment estimate of housing demand in the market sector and should be supported by compelling evidence. These factors were considered fully by the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100) and are reflected in Map 4. TAYplan considers the Proposed Plan (2015) Policy 4 (Doc80) to be consistent with the requirements of Scottish Planning Policy (2014) paragraph 115 (Doc84).

Other respondents in this Schedule 4 Summary of Unresolved Issues make clear that they recognise and support the conclusions reached by TAYplan regarding the transition from currently low to higher build rates. The Scottish Government (910172)

has not made any representations which seek a change to either the housing supply targets or the housing land requirements. TAYplan considers this to indicate that Scottish Government (910172) do not perceive there to be any issues with the method by which TAYplan has determined housing supply targets (and housing land requirements) or with the conclusions of this work as stated in Proposed Plan (2015) Policy 4A/Map 4 (Doc80).

No respondent has provided any compelling or robust evidence to justify their proposed changes to housing supply targets or to refute TAYplan's conclusions. Neither have any respondents presented any evidence to explain how their proposed changes would be better placed to support the delivery of the Plan's vision or the outcomes which underpin it (Doc80).

TAYplan considers this to reinforce its view that it has provided robust and compelling evidence to support the position presented in Proposed Plan (2015) Policy 4/Map 4 (Doc80). TAYplan is therefore satisfied that the current approach is appropriate and does not propose to make any changes to the housing supply targets for Perth & Kinross.

### **SEEK INCREASE IN PERTH & KIRNOSS HOUSING LAND REQUIREMENT**

There are three inter-related categories of response to the issues raised by the respondents seeking an increase in the housing land requirement:

1. The interpretation of Scottish Planning Policy (2014) paragraph 116 (Doc84);
2. The collective inconsistency in the application of the evidence base by respondents to justify these changes and those sought elsewhere; and,
3. The implications for the Housing Land Requirement at TAYplan level.

#### **A) Seek Increase to 10% generosity margin**

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015\_553, Homes For Scotland (735148) PLAN2015\_239, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_404, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_518, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_494, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_465, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_482, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_441 and Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_431**

#### **Interpretation of Scottish Planning Policy (2014) Paragraph 116**

TAYplan does not agree with the respondents that the Proposed Plan (2015) Policy 4A/Map 4 (Doc80) is contrary to Scottish Planning Policy (2014) paragraph 116 (Doc84). Scottish Government (910172) has also not raised any proposed changes or comments relating to this matter. TAYplan considers this to reflect the fact that this is not contrary to Scottish Planning Policy (2014) paragraph 116 (Doc84) and that TAYplan's evidence is robust and compelling in making the case for the position set out in Policy 4A/Map 4 (Doc84).

Scottish Planning Policy (2014) paragraph 116 (Doc84) states that 'the extent of the margin [of generosity i.e. housing land requirement] will depend on local circumstances, but a robust explanation for it should be provided in the plan'. This is specifically acknowledged by some of the respondents in their representations although many of these appear to ignore the element about demonstration of 'local circumstances'.

TAYplan clearly understands the concept of generosity margins and housing land requirements. The approved TAYplan (2012) Policy 5 and page 16 (Doc16) already advocates such an approach but does not stipulate the margin of generosity. This



forms part of the broader strategy adopted by TAYplan and the constituent councils to support sustainable growth in order to deliver the vision. Proposed Plan (2015) Policy 4A/Map 4 (Doc80) sets out the margin of generosity of land supply (housing land requirement) for each housing market area. This continues the approach of the approved TAYplan (2012) Policy 5 (Doc16); the position set out in Scottish Planning Policy (2014) paragraph 116 (Doc84) and the continued ambition for sustainable economic growth to support delivery of the vision and outcomes of the Proposed Plan (pages 4 and 8 – Doc80).

Proposed Plan page 27 paragraph 2 (Doc80) does provide a robust explanation for housing land requirements in Perth & Kinross. This refers to the specific local circumstances which justify this position. Users of the Plan are also directed (on page 29 – Doc80) to the TAYplan Housing Analysis Paper (2015) (Doc100) and also Topic Paper 2: Growth (2015) (Doc104). These documents contain more detail and technical analysis on housing land requirements and other matters covered in Proposed Plan (2015) pages 24 to 29 (Doc80). The respondents have provided no alternative evidence to consider or refute these local circumstances.

The evidence presented by TAYplan recognises that the housing supply targets for Perth & Kinross in Policy 4/Map 4 (Doc80) are extremely ambitious in themselves. TAYplan Housing Analysis Paper (2015) pages 13 to 19 (Doc100) explain that the scale of transition from currently low build rates is significant and the factors needed to deliver this will take time. This means that build rates are likely to be lower in the early years and higher later. Based on the housing land audit information that was analysed it is unlikely that average build rates for the first 12 years (2016-28) will reflect the housing supply targets, although it is possible that they will be reached in some individual years to the latter end of this period.

However, the forthcoming Perth & Kinross Local Development Plan will still need to identify all of the land (the housing land requirement) needed to deliver the housing supply target for all years to 2028. This means that there will be more land than is likely to be used, which provides an implicit level of generosity within the housing supply targets.

Therefore this evidence, which justifies the decision to select housing supply target from preferred Option 1 from the Main Issues Report (2014) (Doc56), is also the evidence that persuades TAYplan that the housing land requirement should be identical. This is because it is this evidence which, firstly, points out the scale of transition and the practicalities of such, and secondly, recognises its implications for delivery and its impact on both supply targets and the likely take up of land which ultimately impacts on housing land requirement. It is therefore false for the respondents to suggest that there is currently 'no generosity' for Perth & Kinross.

For these reasons TAYplan does not believe it is plausible to argue to change the Perth & Kinross housing land requirement without changing Perth & Kinross housing supply targets. Many of these respondents have either specifically or implicitly accepted this evidence for the setting of housing supply targets. TAYplan therefore considers this to mean that the respondents have accepted the evidence for housing supply targets but have chosen not to accept the same evidence and its conclusions for housing land requirement. TAYplan considers this to be inconsistent.

The respondents have also provided no compelling or robust evidence to refute TAYplan's conclusions and to explain why there are local circumstances which support their conclusions. Therefore TAYplan is not convinced that there is any justification for the changes sought.

Overall therefore TAYplan concludes that for Perth & Kinross the achievement of the housing supply target will take time and that the identification of all of the land for this

by the Local Development Plan will build-in significant, implicit generosity of land supply in the period to 2028. TAYplan considers this to reflect the local circumstances described in Scottish Planning Policy (2014) paragraph 116 (Doc84) and to provide the robust and compelling evidence it demands.

TAYplan agrees that the purpose of the generosity margin is to ensure that there is enough housing land to support the delivery of the housing supply targets. Many of the respondents have referenced this as a reason for their representations and the proposed changes they seek. TAYplan considers this principle to be laudable. The evidence shows that there already is implicit generosity and that there is no greater likelihood that build rates will increase as a result of increasing the housing land requirement beyond the levels already stated within Map 4 (Doc80). Doing so may result in different sites being developed instead. However, this is not the same thing and TAYplan considers such a situation risks delivery of the sustainable pattern of development demanded by the Vision (Doc80) and Scottish Planning Policy (2014) paragraphs 40 and 76 to 83 (Doc84). The respondents have provided no robust or compelling evidence to explain how the changes they propose would result in more homes being built than would otherwise be the case if their proposed changes were not made.

The implications of making the proposed changes are set out in the conclusions within this schedule.

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015\_553, Homes For Scotland (785148) PLAN2015\_239 and Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015\_533**

TAYplan agrees that the purpose of the generosity margin is to ensure that there is enough housing land to support the delivery of the housing supply targets. This is laudable and TAYplan supports this principle. The evidence shows that there already is implicit generosity and that there is no greater likelihood that build rates will increase as a result of increasing the housing land requirement beyond the levels already within Map 4 (Doc80). Doing so may result in different sites being developed instead. However, this is not the same thing and TAYplan considers such a situation risks delivery of the sustainable pattern of development demanded by the Plan's vision and Scottish Planning Policy (2014) paragraph 40 and 76 to 83 (Doc84).

The respondents have not provided any compelling or robust evidence of local circumstances or other factors (described above) that mean that the implicit levels of generosity in Map 4 will prevent the transition to higher build rates. Neither have the respondents provided any compelling or robust evidence to explain how their proposed changes to housing land requirements would bring about the circumstances needed to support a speedier transition with higher build rates earlier than anticipated. These matters are arguably driven by macro-economic factors that govern lending, job security, fiscal policy and the capacity of supply chain industry (See TAYplan Housing Analysis Paper (2015) pages 13 to 19 (Doc100) and Topic Paper 2: Growth (2015) pages 34 and 35 (Doc104)). The respondents do not appear to have considered these factors in their representations.

TAYplan is therefore not persuaded that the housing land requirement set out in Policy 4A/Map 4 (Doc80) is contrary to Scottish Planning Policy (2014) Paragraph 116 (Doc84) and is satisfied that Policy 4/Map 4 (Doc80) should remain as written and unchanged.

**Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_404, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_518, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_494, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_465, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_482, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_441 and Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_431**

The respondents have correctly shown that the housing supply targets for Perth & Kinross are identical to the housing land requirement for Perth & Kinross. TAYplan welcomes the specific acknowledgement by these respondents of the need for 'robust evidence' based on 'local circumstances' as set out in Scottish Planning Policy (2014) paragraph 116 (Doc84). However, despite pointing this matter out the respondents have provided no compelling or robust evidence to justify the proposed changes they seek. Nor have they provided any which refutes TAYplan's conclusions.

For the reasons stated above TAYplan is satisfied that it has considered a multitude of local and strategic factors that influence the transition from currently low build rates to higher build rates for Perth & Kinross. These were considered when preparing the Main Issues Report (2014) (Doc56) and in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97), Topic Paper 2: Growth (2015) (Doc104) and the TAYplan Housing Analysis Paper (2015) (Doc100). TAYplan is therefore satisfied that it has appropriately demonstrated robust evidence of local circumstances that justify its decision in relation to housing land requirements. There is no evidence, and none that has been presented by the respondents, to refute this.

TAYplan is therefore not persuaded that the housing land requirement set out in Policy 4/Map 4 is contrary to Scottish Planning Policy (2014) Paragraph 116 (Doc84) and is satisfied that Policy 4/Map 4 (Doc80) should remain as written and unchanged.

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015\_553, Homes For Scotland (785148) PLAN2015\_239**

#### **Collectively inconsistent application of evidence**

The approach taken by all of these respondents presents a paradox where many of the same respondents overtly or implicitly support the housing supply targets for Perth & Kinross yet they seek increases to the housing supply targets and housing land requirements for Dundee City (see Schedule 4 Summary of Unresolved Issues for Issue 017 Housing Supply Targets and Housing Land Requirements – Dundee City).

The increases they propose for Dundee City are justified on the basis of the analysis of the 2012-based population and household projections contained in the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100). However, applying this same logic to the same evidence elsewhere would lead to a reduction in the respective housing supply targets and housing land requirements for Perth & Kinross, North Fife and Angus. It is clear that this is not what is sought by the respondents. There is a lack of evidence to support the proposed increase in housing land requirement (described above). This also contradicts the proposed increase to the housing land requirement for Perth & Kinross without lowering the housing supply targets. TAYplan considers this to undermine the already limited argument for the proposed changes.

To be clear TAYplan is not advocating these changes but is instead pointing out that the respondents have sought a change in Dundee based on one outcome of evidence but they have specifically not sought the equivalent changes elsewhere,

including for Perth & Kinross, even though this is implied by the same evidence. This represents a selective approach to applying the technical outcomes of the exercise in the TAYplan Housing Analysis Paper (2015) (Doc100).

TAYplan considers that the only robust and logical approach is to accept that the Proposed Plan (2015) Policy 4/Map 4 (Doc80) is robust and to therefore accept the approach taken by TAYplan who:

- jointly prepared robust and credible housing need and demand assessment that drew conclusions about the scale of anticipated need and demand for new homes.
- considered the conclusions of an economic outlook report which reinforced the scenario decisions in the housing need and demand assessment as well as considering wider macro-economic drivers.
- considered the evidence of wider economic, social and environmental factors, capacity, resources and deliverability in formulating a policy view of the scale of new homes to be planned for and the different options for this.
- presented the reasonable options in a Main Issues Report and consulted on them.
- considered new evidence, including new population and household projections, and used these to 'sense test' the Main Issues Report options whilst accepting that this work does not constitute a replacement for the housing need and demand assessment.
- presented this evidence and the conclusions for the preferred position to plan for in a housing analysis paper that was published alongside the Proposed Plan.
- accepted that the 2012-based projections are not a replacement for the housing need and demand assessment which remains robust and credible for the 5 years following 24 February 2014.
- accepted that the 2012-based projections are a bit lower than the Main Issues Report Option 1 (preferred option) Housing Supply Targets for Perth & Kinross, Angus and North Fife and that this reinforces the decision to plan for Main Issues Report Option 1 with some implicit generosity. This also makes it very difficult to argue that there is not already generosity in the housing supply targets.
- accepted that the evidence of the scale of transition from currently low build rates also continues to justify Main Issues Report Option 1 for Perth & Kinross and that the practicalities involved with delivering this mean that despite identifying all of the land for this in the Local Development Plan it will not all be used in the first 12 years – thus implying generosity.
- accepted that 2012-projections show for Dundee City the possibility of a higher number of new households but that there is no evidence yet that this is taking place. Therefore a way was created to ensure that there is enough land through the housing land requirement in Policy 4/Map 4 (Doc80) and then Policy 4E (Doc80) to allow Dundee City to respond to this. This also accepts that the same evidence does not imply the need for an equivalent situation elsewhere.

TAYplan's position therefore establishes the robust and compelling evidence demanded by Scottish Planning Policy (2014) paragraphs 115 and 116 (Doc84). It also treats that evidence consistently for all areas and responds to 'local circumstances' through the housing land requirements. By contrast the respondents have presented no compelling or robust evidence to justify their proposed changes and none that refutes the position set out by TAYplan. One cannot simply pick the most preferred conclusions and apply them selectively to one location but then not do so for locations where it doesn't suit one's preferred outcome. This approach has further undermined the already limited case to increase the housing land requirement without necessarily reducing the housing supply target.

TAYplan has shown that the only plausible use of the evidence presented by respondents would also result in a reduced housing supply target for Perth & Kinross, which the respondents do not support.

TAYplan does not support changes to either the housing supply targets or the housing land requirement on the basis of the 2012-based projections because:

- the central justification would be on the basis of the 2012-based population and household projections. These do not constitute a replacement for the housing need and demand assessment. The current TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) is robust and credible for 5 years following 24 February 2014 (Doc54). Before this time TAYplan will be looking to carry out a new housing need and demand assessment during 2017/18 and this is likely to use the 2014-based or even 2016-based population and household projections dependent on publication date.
- there has been no Main Issues Report to test public reaction to the 2012-based projections and their potential impacts. Their sense test implications have been fully and properly considered in the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100). No equivalent analysis is presented by the respondents.
- changes to the housing land requirement (whether housing supply targets are changed or not) fails to recognise the local circumstances regarding the transition from currently low to higher build rates discussed in TAYplan Housing Analysis Paper (2015) pages 13 to 19 and Figures 4 and 5 (Doc100). Irrespective of what is implied by the 2012-based projections there is still no evidence that the housing supply targets will be any more likely to be delivered as a result of increasing the housing land requirement than if it was not changed.

Overall this gives TAYplan further confidence that the housing supply targets and land requirements set out in Policy 4/Map 4 (Doc80) for Perth & Kinross are appropriate and generous. The respondents have presented no compelling or robust evidence to refute TAYplan's conclusions or to substantiate their own views. Again, therefore TAYplan is satisfied that the approach as currently written in Policy 4/Map 4 (Doc80) continues to be based on robust and compelling evidence and is therefore not persuaded that any changes should be made.

The implications of making the proposed changes are set out in the conclusions section within this Schedule.

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015\_553, Homes For Scotland (785148) PLAN2015\_239, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_404, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_518, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_494, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_465, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_482, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_441 and Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_431**

#### **Lack of operational relevance in generosity at TAYplan level**

One premise for these proposed changes is the view that Policy 4A/Map 4 (Doc80) results in a 5% generosity margin in the housing land requirement at TAYplan level.

The respondents have aggregated the housing supply targets and housing land requirement for each housing market area (from Map 4 page 25 Doc80) and calculated the aggregate percentage of generosity at TAYplan level. The respondents conclude this to be 5%. TAYplan calculates this as 5.2%. This matter is also considered in the Schedule 4 Summary of Unresolved Issues for Issues 013

## Housing Supply Targets and Housing Land Requirements for the TAYplan Area.

This 5% figure at TAYplan level is explained by the fact that the housing supply targets and housing land requirements for Perth & Kinross are identical. Proposed Plan (2015) page 27 paragraph 2 (Doc80) explains why and users of the Plan are directed to further details in TAYplan Housing Analysis Paper (2015) (Doc100) and Topic Paper 2: Growth (2015) (Doc104). Perth & Kinross accounts for approximately half of the total housing supply target for the TAYplan area and therefore, unsurprisingly, has this statistical impact on the aggregated percentage margin of the housing land requirement.

This calculation fails to factor in that Dundee City, under Policy 4E (Doc80), can plan to exceed the 10% housing land requirement in Map 4. Based on the respondents' calculations this suggests that 5% would be the minimum level of generosity when considering aggregated figures at TAYplan level. If Dundee City was, for instance to plan for additional land equivalent to 20% generosity, then this would increase the aggregate TAYplan level of generosity to 11.4% - using the equivalent calculation. This shows the potential for variation at TAYplan level and also illustrates the limitations of using figures aggregated to higher level geographies when making points about generosity.

TAYplan has also met the requirements of Scottish Planning Policy (2014) paragraph 118 (Doc84) by stating a housing supply target and land requirement at the necessary geographical levels from the expected date of approval to year 12 in Map 4 (Doc80).

Although there is no mathematical disagreement with the calculation TAYplan does not consider it to properly recognise how Policy 4/Map 4 (Doc80) will be implemented. This is because, irrespective of the aggregate figures for the TAYplan area, each Council will plan for and identify land on the basis of what Map 4 (Doc80) directs it to do at housing market area level reflecting Scottish Planning Policy (2014) paragraphs 115, 116 and 119 (Doc84).

Therefore although this may be statistically correct the implications for the margin of generosity at TAYplan level are operationally irrelevant and have no impact on the implementation of Scottish Planning Policy (2014) paragraph 116 (Doc84). This means that the respective councils will plan for a 10% generosity margin in Angus and North Fife housing market areas – not 5% as implied by the respondents' calculation. Similarly in Dundee City it will be at least 10% (and possibly higher as discussed above) and not 5% as implied by the respondent's calculation.

The only remaining issue is therefore the margin of generosity for Perth & Kinross and whether higher housing land requirements are needed there. TAYplan is satisfied (see above) that no compelling or robust evidence has been provided to support an increase in the housing land requirement for Perth & Kinross and therefore proposes to make no changes.

### **B) Seek Increase to 10-20% generosity margin**

#### **Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015\_533**

Although the respondent seeks an increase in the housing land requirement of 10% to 20% following from an increased housing supply target for Perth & Kinross much of the reasoning for this is identical to that which has been presented by other respondents above. Therefore all of the points raised above relating to interpretation of Scottish Planning Policy (2014) paragraph 116 (Doc84), inconsistent application of evidence and the aggregated TAYplan level generosity are directly applicable in response to the proposed changes sought by this respondent.

Further, however, TAYplan has explained in the TAYplan Housing Analysis Paper (2015) pages 41 to 48 (Doc100) how it considers the application of the generosity margin through housing land requirement and the factors that are relevant to this.

In particular higher ends of the generosity margin (e.g. 20%) are justified where there is either an anticipated factor or a policy trigger that would mean more homes would need to be planned for in a particular area. The TAYplan Housing Analysis Paper (2015) pages 41 to 48 (Doc100) recognise that the 2012-based population projections suggest this is only plausible in the case of Dundee City. Although the 2014 mid-year population and household estimates each show that there is no evidence of this taking place as yet.

In all other areas, including Perth & Kinross, there is no evidence from the 2012-based projections to suggest the potential likelihood of more homes. In fact the 2012-based projections indicate the opposite. When considered alongside the local circumstances regarding the transition from currently low to higher build rates there is already considerable implicit generosity within the respective housing supply targets (TAYplan Housing Analysis Paper (2015) pages 13 to 19 and Figures 4 and 5 (Doc100)).

Therefore there is no compelling or robust evidence to support an increase in the housing land requirement for Perth & Kinross. There is also no evidence to suggest that the proposed increase in housing land requirement would be any more likely to result in more homes being delivered. The respondent has not provided any robust or compelling evidence of any local circumstances or other factors providing justification for the changes they seek. TAYplan is therefore not persuaded that any change should be made to the housing land requirement (or the housing supply targets – see above) for Perth & Kinross.

#### **Additional Evidence**

During 2015 Perth & Kinross Council's Housing Team have prepared a refreshed Housing Need and Demand Assessment (Doc97) and the Council has also published its Housing Land Audit (2015) (Doc69). TAYplan has prepared a Housing and Demography Update Paper (016/Extract/1) which describes the key implications of these two documents and considers these alongside the conclusions from the TAYplan Housing Analysis Paper (2015) (Doc100).

The central conclusions of TAYplan's TAYplan Housing and Demography Update Paper (016/Extract/1) are that both the Perth & Kinross Housing Need and Demand Assessment (2015) (Doc70) and the Housing Land Audit (2015) (Doc69) reinforce the original conclusions of the TAYplan Housing Analysis Paper (2015) and TAYplan's policy thinking to choose Main Issues Report (2014) Option 1 pages 29 and 30 (Doc56). TAYplan considers this to reinforce its views that housing supply targets for Perth & Kinross should not increase, that the same housing supply targets are implicitly generous and that there is therefore no evidence or greater likelihood of delivering the housing supply targets as a consequence of increasing the housing land requirement. There is also no additional compelling or robust evidence of any new local circumstances which justify the changes to the housing land requirement proposed by the respondents.

TAYplan is therefore not persuaded that there is any evidence to support the calls for changing either the housing supply targets or the housing land requirements for Perth & Kinross as set out in Proposed Plan (2015) Policy 4A/Map 4 (Doc80).

## **Authority's Response to Supporting Representations**

### **Colliers International for Scottish Enterprise (835481) PLAN2015\_370**

TAYplan welcomes this support and agrees that the principles and approach set out contribute to the delivery of Scottish Planning Policy (2014) paragraphs 110, 123 and 125 (Doc84).

### **NHS Tayside (908896) PLAN2015\_325**

TAYplan welcomes the support and notes that successive population and household projections can vary in their conclusions. TAYplan agrees that the current approach provides flexibility to respond to these issues in a way which delivers the vision.

### **Savills for The Pilkington Trust & Stewart Milne Group (904840) PLAN2015\_255**

TAYplan welcomes the support for the housing supply targets and housing land requirements in Policy 4 (Doc80) and the view that these reflect Scottish Planning Policy (2014) (Doc84).

TAYplan notes that the respondent is promoting land at Almond Valley which forms part of the West/North West Perth Strategic Development Area identified in Proposed Plan (2015) Policy 3 (Doc80). The contribution of any individual site to the housing supply targets and housing land requirements for a given housing market area is a matter for the respective council in its Local Development Plan.

### **Scottish Water (762198) PLAN2015\_269**

TAYplan welcomes this support.

## **CONCLUSIONS**

Whether looking at Perth & Kinross individually or whether considering the range of arguments presented for proposed housing policy changes elsewhere there are three clear issues with the representations received:

1. The interpretation of Scottish Planning Policy (2014) paragraph 116 (Doc84);
2. The collective inconsistency in the application of the evidence base by respondents to justify these changes and those sought elsewhere; and,
3. The implications for the Housing Land Requirement at TAYplan Level.

TAYplan is satisfied that the Proposed Plan (2015) Policy 4 (Doc80) is consistent with and has properly considered the evidence and presentational requirements of Scottish Planning Policy (2014) paragraph 116 (Doc84). TAYplan is also persuaded that the respondents have interpreted elements of this literally and without the benefit of considering 'local circumstances' despite some quoting this in their representations. It is clear to TAYplan that the respondents have sought changes but have provided no evidence, robust or otherwise, to justify the increases in housing supply targets or housing land requirements which they seek. They appear to have not considered the compelling and robust evidence put forward by TAYplan and have not brought any evidence to refute this or to properly consider the practicalities of the transition from currently low to higher house building rates in Perth & Kinross. They have also not considered how this affects the availability of housing land over the time period to 2028. By contrast TAYplan has considered this.

The respondents have applied TAYplan's analysis of the 2012-based population and household projections from the TAYplan Housing Analysis Paper (2015) (Doc100) in a wholly inconsistent way. This effectively uses the conclusions to make points that suit them, when it suits them, and ignores the evidence when it does not suit them. This undermines their overall case and also reinforces TAYplan's interpretation of the evidence. If this evidence is applied elsewhere in the way the respondents propose for Dundee City then the outcome would be a fall in both the housing supply target and the corresponding housing land requirement for Perth & Kinross. This is contrary to what they seek and undermines their overall case for housing policy changes.



TAYplan is not persuaded that the aggregated housing land requirement for TAYplan level is a relevant issue since this has no bearing on the implementation of the Proposed Plan (2015) though Local Development Plans identifying a range of effective sites. Policy 4/Map 4 will instead be implemented at housing market area level and as such any use of the aggregated housing land requirement for TAYplan level would be misleading and unhelpful. The respondents' analysis also fails to reflect the flexibility for Dundee City offered by Policy 4E (Doc80).

Although many respondents have pointed out that the housing supply targets and land requirements for Perth & Kinross are identical they have not provided robust or compelling evidence to counter this argument. Nor have they presented any robust and compelling evidence of local circumstances which justify an alternative position. Similarly they have not acknowledged the evidence of implicit generosity.

The more recent Perth & Kinross Housing Need and Demand Assessment (2015) (Doc70) and the Perth & Kinross Housing Land Audit (2015) (Doc69) each reinforce TAYplan's thinking as set out in the TAYplan Housing Analysis Paper (2015) (Doc100) and Proposed Plan (2015) Policy 4A/Map 4 (Doc80). This new evidence further refutes that presented by the respondents in support of their proposed changes.

All of this persuades TAYplan that both the housing supply targets and housing land requirement set out in Map 4 would ensure that there are sufficiently generous land supplies being identified in Local Development Plans.

TAYplan is not persuaded that any robust or compelling evidence has been provided which justify the proposed increases in housing supply targets and housing land requirements set out in Policy 4/Map 4 for Perth & Kinross (Doc80). Again, no respondent has provided any evidence which refutes or counters this. Therefore TAYplan remains persuaded by the evidence of the TAYplan Housing Analysis Paper (2015) (Doc100).

TAYplan remains satisfied that Policy 4/Map 4 (Doc80) appropriately respond to the 'local circumstances' that have been identified for Perth & Kinross with respect to Scottish Planning Policy (2014) paragraph 116 (Doc84).

TAYplan is not persuaded that the changes sought will bring about the delivery of more homes. Instead TAYplan considers that an increase in the housing supply target would mean planning for additional homes for which the need and demand is unlikely to exist. Both this and the increases proposed in housing land requirement would provide even more land (added already to the implicit generosity described in the TAYplan Housing Analysis Paper (2015) pages 13 to 19 (/Doc100)). This would mean an even greater supply of land to meet a comparatively lower level of anticipated house building. Such an eventuality would fundamentally risk delivery of the sustainable pattern of development needed to deliver the vision and Policy 1 (Doc80) and Scottish Planning Policy (2014) paragraphs 40 and 76 to 83 (Doc84). The respondents have provided no robust or compelling evidence to consider these practicalities or any analysis to consider the impacts of these changes.

Proposed Plan (2015) page 27 (Doc80) also explains that the regular review of the Strategic Development Plan and supporting evidence provides the appropriate timing and process through which to consider new evidence and amend the Plan should this be necessary. Page 27 recognises that this is likely to happen twice by 2028 (the end point of the first 12 years of the Plan). TAYplan is therefore satisfied that there is appropriate opportunity to involve these respondents and other interested parties in determining how to respond to changing circumstances at regular intervals in the future through a legally defined and openly democratic process of plan preparation.

Neither Scottish Government (910172) themselves nor any key government agency, have sought changes or raised any issues relating to housing supply targets or housing land requirements and the interpretation or implementation of Scottish Planning Policy (2014) (Doc84) or other national policy. These organisations have been involved throughout the preparation of the Proposed Plan (2015) (Doc80).

TAYplan therefore considers that all of the issues raised do not warrant any change to the Proposed Strategic Development Plan (May 2015) (Doc80) and propose that the elements dealt with in this Schedule 4 Summary of Unresolved Issues remain as written and unchanged.

**Reporter's conclusions:**

DPEA use only

**Reporter's recommendations:**

DPEA use only

Committee Version