

Issue (ref and heading):	Issue 012: Policy 4 Homes - Technical and Background Assumptions	
Development plan reference:	Policy 4, Map 4 and supporting text, pages 24 to 29	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Seeking a change Andrew Dundas (821782) Dr Peter Symon (548525) St Andrews Preservation Trust (910253) Strathkinness Community Council (909092)		Supporting as written Colliers International for Scottish Enterprise (835481) Dundee Civic Trust (845127) NHS Tayside (908896) Scottish Water (762198)
Provision of the development plan to which the issue relates:		
The technical and background assumptions for Policy 4/Map 4 are covered in the 'What the policy is for' and 'how the policy works' sections. These explain some of the reasoning behind the direction of Policy 4/Map 4. More detailed technical information about these matters is set out in the TAYplan-wide Joint Housing Need and Demand Assessment (2013), the TAYplan Housing Analysis Paper (2015) and Topic Paper 2: Growth (2015).		
Planning Authority's summary of the representation(s):		
<p>Summary of Representations Seeking a change</p> <p><u>HOUSING MARKET AREAS</u></p> <p>Dr Peter Symon (548525) PLAN2015_409 seeks amendments to the text on Proposed Plan (2015) pages 27 and 29 (Doc80) regarding the word 'generous' for the Perth & Kinross part of the Greater Dundee Housing Market Area. He suggests this on the basis that it would 'correct a factual inaccuracy' and 'avoid perversity'.</p> <p>He considers that the boundary between Greater Dundee and Greater Perth Housing Market Areas should be tested at a more disaggregated level and, if required, amended on Map 4 (Doc80) along with any consequential adjustments to the housing supply targets and housing land requirements.</p> <p>He bases this view on the analysis of sasines data in the Housing Market Area Refresh (Appendix 5 of the TAYplan-wide Joint Housing Need and Demand Assessment (2013)) (Doc97). Here he suggests that Errol and Errol Airfield/Grange have been grouped together in the exercise instead of separately and he considers this to be 'irrational'.</p> <p>He suggests that 'a relatively large number' of sasines transactions are 'presumably' available for both locations. He also suggests that Errol Airfield/Grange is not technically a settlement. He then refers to the consideration of other settlements along the Carse of Gowrie describing, for example, Rait where he suggests that 'only two sasines results were obtained' by TAYplan for the exercise.</p> <p>Given that Errol Airfield/Grange is located approximately half way between Dundee and Perth the respondent appears to consider there to be a strong likelihood that the housing market area boundary must also sit half way between the two settlements.</p> <p>The respondent also describes what he considers to be the specific characteristics and differences between Errol and Errol Airfield/Grange which he considers reinforce his views. He considers that should the boundary lie between Errol and Errol Airfield/Grange then the 'values for housing outputs and housing land requirement could be 'non-negligible given the scale of effective land supply and projected output at Errol Airfield/Grange in particular'.</p>		

Strathkinness Community Council (909092) PLAN2015_227 proposes an update of the boundary of the Greater Dundee Housing Market Area. They believe it should extend much further into North Fife to include St Andrews and Cupar. They base this on the view that they consider the current boundary to 'include Arbroath and Coupar Angus'.

DEMOGRAPHIC ISSUES

Andrew Dundas (821782) PLAN2015_181 implies changes to the anticipated demographic situation envisaged through the plan. He considers that the plan has not reflected changing technology and demography.

The respondent considers rising life expectancy to be the 'sole driver' of Scotland's population growth and cites a 'decline in Scottish birth rates' as being insufficient to offset the rate of growth in what he terms the 'pensioner population'.

The respondent suggests that the number of one and two person households represents the fastest growing category of household. He also suggests that all other categories of household size are 'much fewer in number and in long-term decline' because of the 'demographic shift' he describes.

Based on this evidence the respondent is 'sceptical' of the TAYplan strategy, implying that he does not feel the demographic factors he describes have been properly reflected in the Plan and that this will ignore what he terms as 'what householders want'.

The respondent also considers that 'few of TAYplan's strategies take account of these fundamental changes' in how people live, which he suggests 'favours more city-centre housing'. He considers that this has resulted in a 'lack of forward looking and commercial awareness' in the strategy and he thinks that this should be remedied.

The respondent considers that 'planning is a rationing system' where government controls the supply of development land. He suggests that this has the potential to create what he terms 'significant development errors' and that developed land can create increases in both Council Taxes and Business Rates with 'consequential errors' that affect government income and economic potential.

Andrew Dundas (821782) PLAN2015_184 implies that changes are needed to the current assumptions underpinning the Proposed Plan so as to cater for more 'smaller households' which he considers to be 'woefully un-provided need'. This is because he considers that households are more likely to be made up of what he terms the 'large and growing numbers of households with one or two persons' and 'much less likely to include children of school age'.

The respondent suggests that most of these 'smaller households' will be 'empty-nesters' (those whose children have grown up and left home) who are seeking to 'down-size'. He also suggests that some of these 'smaller households' will also be aged under 35 and single or unlikely to include school-age children yet. In both instances he suggests that these households 'usually prefer to live in city-centre housing'. He concludes that this also means these households will bring spending money into city and town centres.

Andrew Dundas (821782) PLAN2015_245 would like to see TAYplan 'acknowledge and emphasise' that the growth in numbers of households in the TAYplan area is largely due to what he terms 'the diminishing household size and older ages of their occupants'.

He considers that most growth in households is 'amongst elderly and one & two person households' and suggests these have 'quite different needs and preferences'

to households in the past.

The respondent suggests that these households need 'small units [Homes] with less or no garden space' and 'all within easy walking distance of shops, medical facilities and public transport'. The respondent suggests that 'in Perth & Kinross one in five persons is retired' and that 'in St Andrews and parts of Dundee the needs are for rental and short-term accommodation close to the city centre/university campuses'.

The respondent also asks TAYplan to note that the birth rate in Scotland is 'already at a record lowest since the 19th Century' and as such that what he describes as 'fragmenting households' and 'rising life expectancy' are driving the demand for homes.

St Andrews Preservation Trust (910253) PLAN2015_542 considers a high quality and adequate supply of homes to be 'laudable', however, they also think that more evidence is needed 'listing future needs as forecast by main stakeholders including industry and commerce'. They consider that the current assumptions are more 'hope than fact based' and result from scenario models with 'doubtful assumptions'.

Summary of Supporting Representations

GREATER DUNDEE HOUSING MARKET AREA

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.

Dundee Civic Trust (845127) PLAN2015_282 supports the recognition that the Greater Dundee Housing Market Area extends into parts of the local authorities which surround Dundee City. They consider that this should form the basis of a new unitary authority. They suggest that in specific areas house building targets in specific areas have been exceeded as a result of what they describe as 'rogue' planning approvals.

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'.

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:

Dr Peter Symon (548525) PLAN2015_409 proposes the following changes:

- Pages 27 (twice) and 29: insert after the word "generous", "except in the Perth & Kinross part of the Greater Dundee Housing Market Area".
- Location of boundary between Greater Dundee Housing Market Area and Greater Perth Housing Market Area should be tested at a more disaggregated level of analysis and, if required, amended on Map 4, and the values for Housing Supply Targets and Housing Land Requirements adjusted accordingly.

Strathkinness Community Council (909092) PLAN2015_227 propose extending the Greater Dundee Housing Market Boundary to include Cupar and St Andrews.

Andrew Dundas (821782) PLAN2015_181 implies that changes should be made to the anticipated demographic situation envisaged through the plan.

Andrew Dundas (821782) PLAN2015_184 implies that changes should be made to the current assumptions underpinning the Proposed Plan regarding smaller households.

Andrew Dundas (821782) PLAN2015_245 proposes that TAYplan should acknowledge and emphasise that the growth in numbers of households in the TAYplan area is largely due to the diminishing household size and older ages of their occupants.

St Andrews Preservation Trust (910253) PLAN2015_542 implies changes regarding the realism of the growth assumptions.

Summary of responses (including reasons) by Planning Authority:

CONTEXT

TAYplan and the four constituent councils jointly prepared a housing need and demand assessment to cover Angus, Dundee City, Perth & Kinross and North Fife.

The first stage was a housing market area refresh to understand whether the current housing market area boundaries were relevant. This was published in September 2012 and later became Appendix 5 of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97).

The methodology used was consistent with origin-based and destination-based analysis described in both the Scottish Government's Local Housing Systems Analysis: Good Practice Guide, Chapter 4 (Doc55) and the Housing Market Areas in Scotland: Definition and Review Volume 3: Guidance on Market Area Definitions (2003) by DTZ Piedad for Communities Scotland (Doc51). At the time both of these were the most recent advice available.

During 2013 the partnership worked on the main elements of the housing need and demand assessment. At this time the 2008 guidance was operational and this was used. However, the partnership also worked closely with the Scottish Government's Centre for Housing Market Analysis to pilot the spreadsheet tool which is used to carry out many of the calculations and to run scenarios. The tool was completed and rolled out in summer 2013 and work concluded in October 2013 followed by a consultation of wider organisations (these are listed in Appendix 4 of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97). Minor changes were made and the document was submitted to the Centre for Housing Market Analysis in December 2013.

Following minor amendments the document was declared robust and credible by the Centre for Housing Market Analysis on 24 February 2014 (Doc54). A summary of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) is also included in Topic Paper 2: Growth (2015) on pages 31 to 33 (Doc104).

TAYplan also commissioned Oxford Economics to prepare an Economic Overview for the area. Although separate this considered the scenarios in the TAYplan-wide Joint Housing Need and Demand Assessment (2013). Its conclusions support those drawn by the TAYplan-wide Joint Housing Need and Demand Assessment (2013). A summary of the TAYplan Economic Overview (2014) (Doc98) is contained in Topic Paper 2: Growth (2015) on pages 23 to 29 (Doc104).

The conclusions of both the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) and the TAYplan Economic Overview (2014) (Doc98) informed the housing options considered in the TAYplan Main Issues Report (2014) pages 29 and 30 (Doc56).

Following the Main Issues consultation (2014) (Doc56) TAYplan considered more recent information including the 2012-based population and household projections

(during Autumn 2014 to spring 2015). These had not been published at TAYplan level until summer and autumn 2014. This analysis is contained within the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100) and summarised in Topic Paper 2: Growth (2015) pages 45 to 52 (Doc104).

Authority's Response to Proposed Changes

HOUSING MARKET AREAS

Dr Peter Symon (548525) PLAN2015_409

The TAYplan-wide Joint Housing Need and Demand Assessment (2013) Appendix 5 (Doc97) contains the housing market area refresh exercise which used a hypothesis based approach. This tested whether there was any reasonable evidence to suggest that the existing housing market area boundaries had changed. It also tested whether the 2001 Greater Dundee Housing Market Area boundary was reasonable. The history of the Greater Dundee Housing Market Area is discussed in Topic Paper 2 Growth (2015) on pages 39 and 40 (Doc104).

The Housing Market Area Refresh was prepared jointly by TAYplan and the four councils. It was declared robust and credible as part of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97). There are several key technical points about how the exercise considers Errol and Grange which are explained below:

1. The exercise to look at the Greater Dundee Housing Market Areas in the Carse of Gowrie – as carried out during 2012

TAYplan examined house moves in the Carse of Gowrie between Dundee and Perth to understand whether the 2001 Greater Dundee Housing Market Area boundary was reasonable. This exercise looked firstly at all house moves recorded in sasines during 2008, 2009 and 2010 where named settlements in the Carse of Gowrie were the destination. There were 101 moves where Errol/Grange was the destination. This number filters-out origin locations that were not within the Carse of Gowrie or elsewhere in Greater Perth or the Greater Dundee Housing Market Areas (this figure of 101 corresponds with that in section 3 below). TAYplan-wide Joint Housing Need and Demand Assessment (2013) Appendix 5 pages 29 to 32 and Figure 25 (Doc97) discuss this.

2. The consideration of Errol and Grange together

Some of the destinations for house moves were to countryside locations between Errol and Grange or around them and it was not easy to apportion these house moves to either settlement. There were approximately 14 such moves. Also much of the origin and destination information in sasines was presented at postal town level which meant it was initially difficult to distinguish between Errol and Grange.

Although TAYplan does not consider its approach to be illogical we have presented the same information but separating Errol and Grange (below) to demonstrate its impact on the points raised by the respondent.

3. The output of separate data for both Errol and Grange

In total there were 173 house moves where either Errol or Grange or surrounding areas were the destination during 2008, 2009 and 2010. Of these 35 moves were to Grange, 124 to Errol and 14 to areas surrounding or between both, but where the post town was marked as Errol. Factoring-out the 72 moves that were not from Carse of Gowrie Settlements, the Greater Perth Housing Market Area or from the Greater Dundee Housing Market Area - there were then 20 moves to Grange and 81 moves to Errol during 2008, 2009 and 2010. This total of 101 moves is consistent with the 101 moves described in section 1 above.

Of the 81 moves to Errol 32 originated in Perth, 1 in Glencarse, 28 in Errol itself and 20 in Dundee, Inchtute or Kingoodie. The dominant origins here are Perth and Errol itself, which continues to suggest that it is reasonable to conclude that Errol is part of the Greater Perth Housing Market Area.

Of the 20 moves to Grange 11 originated in Perth or Errol and 9 originated in Dundee or Invergowrie. This shows that there were similar levels of moves originating from both the Greater Dundee and Greater Perth Housing Market Areas. This is unsurprising given that Grange is almost equidistant between Perth and Dundee. This data shows that there is no reasonable evidence to suggest that the 2001 Greater Dundee Housing Market Area boundary is wrong or that it should be extended to include Grange.

4. The impact of this on housing market area boundaries

This exercise shows that despite their location and whether considered together or individually there is no compelling evidence to suggest that either Errol or Grange is part of the Greater Dundee Housing Market Area or that the boundary should shift west to include one or both of them. Instead it is clear that both settlements are part of the Greater Perth Housing Market Area. It is therefore reasonable to continue the assumption, as set out in the Proposed Plan (2015) Map 4 (Doc80), that Grange is part of the Greater Perth Housing Market Area.

5. The impact on Housing Supply Targets and Housing Land Requirements

This shows that there is no reasonable justification for altering the housing supply targets or housing land requirement for the Greater Perth or Greater Dundee Housing Market Areas on the basis of the representations made by the respondent.

Similarly TAYplan considers that the current descriptions of 'generous' on Proposed Plan (2015) pages 27 and 29 (/Doc80) are and continue to be contextually appropriate to the matters being discussed in that respective text. TAYplan sees no reason to make the proposed changes as this would provide no more assistance to a reader and may well cause confusion since the housing land requirement for all housing market areas within Perth & Kinross are identical to the respective housing supply targets. The text in question is explaining these and related issues. TAYplan therefore proposes to make no change.

Strathkinness Community Council (909092) PLAN2015_227

The housing market area boundaries were identified using a consistent approach of origin and destination data for house moves from sasines information. This was a hypothesis approach to determine if current housing markets and the 2001 Greater Dundee Housing Market Area boundaries were reasonable. This forms Appendix 5 of the robust and credible TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97).

This exercise showed the 2001 Greater Dundee Housing Market Area boundary is reasonable and that there is very little evidence to support its extension to include Cupar or St Andrews. The evidence strongly supports the conclusion that Cupar is part of the Cupar and North West Housing Market Area and that St Andrews is part of the St Andrews and East Fife Housing Market Area.

For clarity neither Arbroath nor Coupar Angus are part of the Greater Dundee Housing Market Area and the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Appendix 5 (housing market area refresh) (Doc97) clearly shows these settlements to be part of the East Angus and Strathmore & Glens Housing Market Areas respectively.

DEMOGRAPHIC ISSUES

Andrew Dundas (821782) PLAN2015_181, PLAN2015_184 and PLAN2015_245

TAYplan does not agree with that planning is 'a rationing system' or that it leads to 'significant development errors'. Development rights have been nationalised and we operate within a plan-led system to ensure that problems are identified and resolved prior to development taking place. The Proposed Plan seeks the optimum result to deliver the vision and the outcomes which underpin it.

The planning system is there to support sustainable development as set out in Section 4E of the Planning etc. (Scotland) Act 2006 (Doc74). There must be an acceptance that this sometimes means there is a need to safeguard land for a limited range of land uses to protect an asset or sensitive features (Policy 9 – Doc80). There must also be broader value judgements about social, environmental, physical and also economic outcomes of development versus alternatives.

Development plans and development management provide certainty to citizens, politicians and businesses alike. All have a stake in the decisions that are taken about development. The system ensures that one person's property rights are not compromised by another's without appropriate consideration of the impacts.

Although some of the features pointed out may arise from the existence of a planning system, other contributing factors outside of the planning system are fiscal policy and market choice. Similarly the consequences of failing to think through the impacts of future development in advance (i.e. to plan) are considered to present far greater risks to the delivery of the vision and outcomes. The vision and outcomes are themselves a fundamental part of delivering the TAYplan area's four community plans and single outcome agreements. In city regions this brings together the councils whose areas cover the functional geographies and urban areas of the largest cities in an equal partnership to coordinate planning and action for Scotland's key economic drivers. Failure to plan would be, by default, planning to fail.

TAYplan does not agree that it has overlooked technologies. The Main Issues Report (2014) (Doc56) and work on the Proposed Plan (2015) (Doc80) was underpinned a study into Land Use Strategy Change 2035-2050 (2013) (Doc53). This was jointly commissioned by TAYplan, Tactran Regional Transport Partnership, Scottish Environment Protection Agency and Architecture and Design Scotland. It looked at the anticipated changes in the way we will live and behave over the forthcoming 50 years or so. It considered over 100 pieces of research, included examination of technological changes. It is summarised in Topic Paper 1 Vision and Outcomes (2015) page 11 (Doc104).

TAYplan does not agree that the 'sole driver' of Scotland's population growth is rising life expectancy. Population change is affected by natural change (birth rates and death rates rather than one of these) and net migration. TAYplan accepts that rising life expectancy means people live longer and this coincides with a significant population cohort (the post-world war 2 'baby boom' generations) now entering pensionable age groups.

Examining Table 4 Components of Population Change in both the National Records of Scotland Mid-Year Population Estimates 2013 (012/Extract/2) and 2014 (012/Extract/3) shows the number of births to be 56,843 (mid 2012-mid 2013) and 56,101 (mid 2013-mid 2014). Both figures are higher than the 53,000 suggested by the respondent for 2013. However, natural change was 909 for (mid 2012-mid 2013) and 3,517 (mid 2013-mid 2014). During the same periods net migration was 9,962 and 15,585 people respectively. This suggests that net migration is the dominant driver of population growth at Scotland level in the most recent two years.

This is reinforced by Table 6 National Records of Scotland Mid-Year Population 2014 (012/Extract/3) which looks at Components of Population Change 2004 to 2014. Over this period natural change (births minus deaths) accounted for 25,693 people but net migration accounted for 224,578 people. This suggests that over the last decade net migration was the principal driver of population change. High life expectancy may well have been a significant factor in influencing natural change but it seems clear it was neither the sole factor nor the dominant one in influencing population growth.

The National Records of Scotland Births Time Series Data Table BT1 Births by Sex in Scotland 1855 to 2013 (012/Extract/4) presents slightly different figures based on calendar year rather than mid-year. Again for 2013 these present a births figure of 56,014. BT1 (012/Extract/4) demonstrates gradually falling birth rates, albeit with fluctuations, in the post war era to a low in 2002 with a significant rise to 2008 onwards. The respondent is correct that current birth rates are about half those of the early 1960s peak of 100,000, although such levels have never been repeated in the subsequent 48 years.

TAYplan does not accept the respondent's direct translation of Scottish trends to the TAYplan area. Although some of these trends are apparent the drivers of future population change and demographic structure at Scotland level differs notably for individual areas within TAYplan.

TAYplan considered projected demographic changes in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 2 and Chapter 5 (Doc97). These used the 2010-based population and household projections which were then the most recent. These assumptions informed the development of scenarios which were then examined.

After the Main Issues Report consultation (April-June 2014) National Records of Scotland published the 2012-based population projections at TAYplan level. This is shown in TAYplan Housing Analysis Paper (2015) Figure 12 page 33 (Doc100). This shows the very distinct variations in projected population change for the different council areas covered by TAYplan compared with the equivalent projected trends for Scotland. In particular it shows the strong difference in proportional growth of specific age groups. This differs considerably from Scottish trends for North Fife, Dundee City and Perth & Kinross in particular.

Similarly TAYplan Housing Analysis Paper (2015) Figures 13A and B on page 34 (Doc100) show that net migration is projected to be a more dominant driving force in the TAYplan population than natural change. In other words despite the growth in life expectancy it is net inward migration, particularly to Perth & Kinross that will drive population growth at TAYplan level. It is also apparent at TAYplan level in Figure 13A that natural change is projected to diminish in its significance post 2027 but net migration is not.

All of this suggests that irrespective of whether the respondent accurately describes Scotland's demographic situation or not it is clear that he does not accurately describe the TAYplan demographic situation. TAYplan is therefore satisfied that it has properly and fully considered these matters at the appropriate stages and that these have properly informed the Proposed Plan.

TAYplan agrees that the number of elderly people will increase as people live longer and that these age groups will represent an increasing share of the population. However, TAYplan does not agree that other households will fall in number. Examination of the 2010-based population and household projections in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 3 (Doc97) concludes that the number of families with children is expected to grow.

However, the more significant growth in the number of elderly people will mean that the former falls as a proportion of households but not numerically.

The Proposed Plan (2015) page 26 (Doc80) presents the 2012-based projected population composition for 2012 and 2037. It shows growth in populations of all three of the groups. The largest proportional increase is children (20.8%), then pensionable age groups (19.6%) and then working age groups (10.4%).

The National Records of Scotland Mid-Year Population Estimates 2014 Table 7 (012/Extract/4) shows that 24 % of Perth & Kinross population are of pensionable age. However, this does not automatically mean that all those within this age group are retired and does not account for those who may have retired before reaching pensionable age. Given these factors 20% may not be an unreasonable proxy for this. But the information shows that this figure is identical to Angus and many other authorities in Scotland show proportions of retirement aged populations in excess of 20%. Therefore although the statement may not be inaccurate it does not appear especially unusual.

Although the respondent is correct that the growing number of elderly households is a major driver of future housing need and demand he has not provided any evidence to demonstrate that this, or indeed any other factor of TAYplan's evidence, is inaccurate.

The respondent has also not provided any evidence that means that current housing provision is inadequate. TAYplan accepts that there are likely to be instances where the needs of older age groups, or indeed others, are not properly met in the market. However, the respondent's evidence does not automatically support that conclusion or the implication that it applies universally.

TAYplan also does not agree with the assertions that elderly people only need particular types or sizes of housing 'with no garden'. This is a gross generalisation which is based on no evidence of housing aspiration or consumer wishes – or at least none has been provided.

The issues of household size versus size of home and stage of life were considered in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 5 page 195 in Part D (Doc97). This concludes that there is no evidence to suggest that small households and/or elderly households automatically 'need' or aspire to small homes and little or no garden. The respondent has not provided any evidence to consider situations where this is not the case, such as where the 'empty nesters' he describes may choose to remain because the property is 'home' or supports their lifestyle or allows space for family or other visitors to stay. There are also very clear health and wellbeing benefits to gardens which may well be sought by people of all age groups, as recognised in Proposed Plan (2015) page 17 (Doc80) through the concept of Lifetime Communities. The respondent has made a series of sweeping generalisations which fail to recognise the range of varying needs and aspirations dependent on circumstances and householder preferences. The respondent has provided no evidence to support their claims.

TAYplan does not accept that the way we live our lives now favours city centre housing only, as implied by the respondent. The Proposed Plan (2015) Policies 1 and 5 (Doc80) support city centre living and also focus the majority of new development within principal settlements. However, there is no evidence to suggest that city centre living is either the dominant aspiration or indeed a practical or deliverable solution for the entire population. This is not to say that some people do not have these preferences rather that the assertions made by the respondent appear to be all-encompassing when this is unlikely. The respondent has provided no evidence to substantiate this.

Proposed Plan (2015) Policy 4C (Doc80) plans for a range of housing type, size and tenure to meet the needs and aspirations of a range of households throughout their lives. It is for local authorities to consider priorities for more detailed aspects of this through their Local Housing Strategies and Local Development Plans.

TAYplan does not agree in totality with the comments on demographic structure but does agree that there will be commercial opportunities to meet the changing demography of our area. Some of these will be realised through new homes being built that reflect the needs and aspirations of these groups but the majority will be the consequence of moves within the existing housing stock. No evidence has been presented which suggests that new housing, whatever it is, will or will not be 'what householders want'.

TAYplan disagrees with the assertion that 'on the whole, there is a lack forward looking and commercial awareness in this Strategy'. TAYplan has considered a breadth and depth of research and other material to understand the key drivers of emerging and future change. This has included those we can influence and those we cannot. TAYplan has involved commercial operators and key government agencies in the process. It is true that there will not always be agreement but TAYplan's central motivation as a public body is the delivery of the vision and the four outcomes which underpin it.

Given the differences described above, TAYplan remains satisfied that its strategies appropriately account for the fundamental changes taking place in the demographic structure of the area and future changes in lifestyle and technology. The broader consideration of economic factors including the TAYplan Economic Outlook (2014) (Doc98) and its consideration of TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) suggest that TAYplan has considered economic and commercial realities. The respondent has provided no evidence to counter this work and has not presented alternatives.

The argument that the need in St Andrews and parts of Dundee City is primarily for rent is made without any evidence and appears to be based principally on the existence of universities. Student accommodation was examined in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 3 pages 169 to 171 (Doc97). It is clear in parts of both settlements that the universities bring market pressures and demands to specific areas. However, the generalisation appears to miss the depth of work carried out in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) which concludes the scale of new homes in the purchase and various rental sectors. No equivalent evidence has been provided by the respondent to substantiate their claims or to refute the evidence from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97).

The respondent has made several further generalisations which appear to have no factual evidence to back them up. TAYplan is satisfied that it has fully and properly considered the technological, economic and demographic issues facing the region in the future. The economic and demographic factors were also considered more recently in the TAYplan Housing Analysis Paper (2015) pages 13 to 48 (Doc100). These have properly informed the Proposed Plan. TAYplan therefore proposes to make no changes.

St Andrews Preservation Trust (910253) PLAN2015_542

TAYplan is satisfied that it has appropriately examined the implications of the recent populations and household projections through the robust and credible TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 2 and Chapter 5 (Doc97) and subsequent work in the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100).

TAYplan disagrees with the assertion that these are 'more hope than fact based'. Recent evidence cited in the TAYplan Housing Analysis Paper (2015) pages 12 to 24 (Doc100) suggests that the situations anticipated by the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) are taking place with a 'bumpy' road to recovery in the economy and the housing market. TAYplan is also satisfied that the TAYplan Economic Outlook (2014) (Doc98) appropriately considered the macro-economic factors that influence the economy of our area and appropriately analysed the likelihood of the scenarios taking place from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97).

TAYplan also disagrees with the view that the assumptions are 'doubtful'. Although the respondent expresses doubt about these assumptions TAYplan is satisfied that the breadth and depth of factors considered is appropriate and that these show our conclusions to be reasonable. The respondent has not provided any additional evidence which refutes that provided by TAYplan in order to support their view of doubt. Therefore TAYplan does not propose to make any changes.

Authority's Response to Supporting Representations

GREATER DUNDEE HOUSING MARKET AREA

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).

Dundee Civic Trust (845127) PLAN2015_282

TAYplan welcomes the support for the whole Policy, including the research into housing market areas.

Any decisions about new councils or the establishment or otherwise of public bodies are matters for UK and or Scottish Governments. These are not affected by TAYplan or its preparation of a Strategic Development Plan.

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.

Scottish Water (762198) PLAN2015_269

TAYplan welcomes this support.

Conclusions

Having looked again at its work TAYplan is satisfied with the robustness of its conclusions about housing market area boundaries. As such there is no issue for these or the related scale of housing supply target or land requirement as stated in Policy 4A/Map 4.

TAYplan agrees that the ageing population is one of the drivers of future change in demographic and household structure. However, TAYplan is also satisfied it has properly examined the related evidence at the appropriate geographical levels. TAYplan is also satisfied that it has taken a measured approach to more qualitative factors and is therefore satisfied that Policy 4C considers the variations in housing need and aspiration without making sweeping generalisations which are not backed up by any detailed analysis or evidence.

TAYplan is satisfied that it has considered a range of technological, economic and demographic factors as well as physical, social and environmental factors that will

affect the TAYplan area in the future. This includes information about recent trends and future projections to help understand the drivers of change and the likely way in which these will manifest themselves. The respondents have not presented any additional evidence to refute this or which cast doubt over TAYplan's assumptions.

TAYplan is therefore satisfied that the evidence base for the Proposed Plan is sound.

Neither the Scottish Government nor any other government agency has raised any issues regarding Policy 4C or the evidence base and background assumptions for Policy 4.

TAYplan 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