

<b>Issue (ref and heading):</b>	Issue 013: Annual Housing Supply Targets and Housing Land Requirements – TAYplan Level	
<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>		
<b>Seeking a change</b> D Barrie (907989) Gladman Developments Ltd (846254)		<b>Supporting as written</b> Colliers International for Scottish Enterprise (835481) NHS Tayside (908896) Scottish Water (762198)
<b>Provision of the development plan to which the issue relates:</b>		
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 in Map 4 are set out for each constituent council area to provide clarity for the respective Local Development Plans. This Schedule relates specifically to points that are TAYplan-wide.		
<b>Planning Authority's summary of the representation(s):</b>		
<b>Summary of Representations Seeking a change</b>		
<b><u>OVERCROWDING</u></b>		
D Barrie (907989) PLAN2015_16 appears to suggest that 'more housing' is needed as a consequence of 'overcrowding'. It is not clear whether they seek a change to the housing supply targets or instead wish to see these homes delivered in full so that there is 'more housing'.		
<b><u>HOUSING LAND REQUIREMENT AT TAYPLAN LEVEL</u></b>		
Gladman Developments Ltd (846254) PLAN2015_374 seeks an increase in the housing land requirement for TAYplan area to 10%. This is because they consider the total level of generosity for the TAYplan area to be 5% and consider this to be contrary to Scottish Planning Policy (2014) Paragraph 116 (Doc84).		
<b>Summary of Supporting Representations</b>		
<b><u>SUPPORT FOR BASIS AND APPROACH OF POLICY 4</u></b>		
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'.		
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:****OVERCROWDING**

**D Barrie (907989) PLAN2015\_16** proposes that 'more housing' is needed

**HOUSING LAND REQUIREMENT AT TAYPLAN LEVEL**

**Gladman Developments Ltd (846254) PLAN2015\_374** proposes an increase in the housing land requirement for the TAYplan area so it includes a generosity margin of at least 10%.

**Summary of responses (including reasons) by Planning Authority:****Context**

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

The Perth & Kinross build rates planned for in approved TAYplan (2012) Policy 5 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). Continuing to plan for this would 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 stage in 2014. It was 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 37 (Doc104) and the TAYplan Housing Analysis Paper (2015) pages 13 to 24 (Doc100).

TAYplan consulted on two housing options in the TAYplan Main Issues Report (2014) on page 29 and 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 100%.

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. 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) (Doc56) consultation. The evidence cited in TAYplan Housing Analysis Paper (2015) persuaded TAYplan that it was most logical and realistic to plan for Main Issues Report Option 1 page 29 and 30 (Doc56) and this now forms Proposed Plan (2015) Policy 4/Map 4 (Doc80).

Scottish Planning Policy (2014) (Doc84) was published in the final week of the Main Issues Report consultation in 2014 (Doc56). It has been fully considered in the preparation of the TAYplan Housing Analysis Paper (2015) (Doc100) and the subsequent Proposed Plan (2015) (Doc80).

**Authority's Response to Proposed Changes****OVERCROWDING****D Barrie (907989) PLAN2015\_16**

Overcrowding and concealed households are considered in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 1 and Chapter 4 (Doc97). Chapter 4 pages 176 to 181 (Doc97) explain how overcrowding has been considered in defining the Current Housing Need (sometimes known as Backlog Housing Need).

Newly arising households are considered in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 2 (Doc97).

These were then brought together using the Centre for Housing Market Analysis spreadsheet tool. This is described in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 2 and the results are discussed in Chapter 5 (Doc97).

TAYplan agrees that overcrowding is a factor and is satisfied that consideration of this, alongside other relevant information, has contributed to the housing supply targets and housing land requirement set out in Policy 4A/Map 4 (Doc80).

TAYplan does not consider that any change is required as a result since the Proposed Plan responds to the conclusions of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) and important related factors discussed in the TAYplan Housing Analysis Paper (2015) (Doc100) and Topic Paper 2 Growth (2015) (Doc104). This is consistent with the evidence and presentational requirements of Scottish Planning Policy (2014) paragraph 110 to 119 (Doc84).

### **HOUSING LAND REQUIREMENT AT TAYPLAN LEVEL**

#### **Gladman Developments Ltd (846254) PLAN2015\_374**

Although these comments are at TAYplan level they are strongly related to those made specifically about Perth & Kinross Housing Market Areas in Schedule 4 Summary of Unresolved Issues 014 Housing Supply Targets & Housing Land Requirement for Perth & Kinross.

These proposed changes are sought on the basis that Policy 4A/Map 4 does not include a 10% generosity margin in the housing land requirement at TAYplan level. The respondent has aggregated the housing supply targets and housing land requirement for each housing market area in TAYplan (from Map 4 page 25 – Doc80) and calculated the aggregate percentage of generosity at TAYplan level. The respondent concludes this to be 5%. TAYplan calculates this as 5.2%.

This 5% figure 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 more details are set out in TAYplan Housing Analysis Paper (2015) pages 41 to 48 (Doc100). 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 its 10% housing land requirement stated in Map 4 (Doc80). Based on the respondent's 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.

Although there is no mathematical disagreement with the respondent's 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 what Map 4 (Doc80) directs it to plan for at housing market area level - reflecting Scottish Planning Policy (2014) paragraphs 115 and 116 (Doc84).

This means that irrespective of the aggregate generosity at TAYplan level the respective councils will plan for a 10% generosity margin in Angus and North Fife housing market areas – not 5% as implied by the respondent’s 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.

This means that the real issue being raised is actually about the margin of generosity for Perth & Kinross. This issue is considered in the Schedule 4 Summary of Unresolved Issues 014 Housing Supply Targets & Housing Land Requirement for Perth & Kinross.

TAYplan does not agree with the respondent that the aggregate generosity situation is contrary to Scottish Planning Policy (2014) paragraph 116 (Doc84). Firstly, for the reasons stated above - aggregating housing land requirements, which vary, does not present a true picture of how housing land requirements are implemented. Secondly, TAYplan considers the proposed changes to be a literal translation of Scottish Planning Policy (2014) Paragraph 116 and Diagram 1 (Doc84) and that these fail to recognise the robust evidence of ‘local circumstances’ provided by TAYplan in the TAYplan Housing Analysis Paper (2015) pages 13 to 18 and 41 to 48 (Doc100).

Scottish Government has not proposed any changes or made any 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 4/Map 4 (Doc80).

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’.

TAYplan clearly understands the concept of generosity margins and housing land requirements. The approved TAYplan (2012) Policy 5 (Doc16) already advocates such an approach but does not stipulate the margin of generosity. Proposed Plan (2015) Policy 4/Map 4 (Doc80) sets out the margin of generosity of land supply (housing land requirement) for each housing market area.

Proposed Plan page 27 paragraph 2 (Doc80) does provide a robust explanation, although the plan is not the appropriate place for all of the technical detail. Users of the Plan are directed to the technical documents throughout the Plan e.g. Proposed Plan (2015) page 29 (Doc80). This information is contained in the TAYplan Housing Analysis Paper (2015) pages 13 to 18 and 41 to 48 (Doc100) and is also referred to in Topic Paper 2: Growth (2015) section D pages 33 to 39 and pages 45 to 52 (Doc104). These explain the specific local circumstances which justify this position. The respondent has provided no alternative evidence to consider or refute these local circumstances.

The evidence presented by TAYplan recognises firstly that the housing supply targets set out for Perth & Kinross in Map 4 (Doc80) are extremely ambitious in themselves. TAYplan Housing Analysis Paper (2015) pages 13 to 18 (Doc100) explain that the scale of transition from currently low build rates to the levels in Map 4 is significant and the factors needed to deliver this will take time. This means that build rates will 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 these levels will be reached in some individual years later in this period.

However, the next Perth & Kinross Local Development Plan will still need to identify all of the land needed to deliver the housing supply target for all years. 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 the evidence which justifies the decision to select housing supply target based on the preferred from Main Issues Report (2014) Option 1 pages 29 and 30 (Doc56) is also the evidence that persuades TAYplan that the housing land requirement should be identical.

Given the evidence link described above TAYplan does not believe it is plausible to argue to change housing land requirement without changing housing supply targets. The respondent has not sought changes to the housing supply targets. TAYplan therefore considers this to mean that the respondent has accepted the evidence for housing supply targets but has chosen not to accept the same evidence and its conclusions for housing land requirement.

The respondent has therefore provided no compelling or robust evidence to refute TAYplan's conclusions and therefore TAYplan is not persuaded 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 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.

The purpose of the generosity margin (housing land requirement) 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, but the local circumstances suggest that there is no greater likelihood that build rates will increase as a result of increasing the margin of generosity. 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).

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

### **SUPPORT FOR BASIS AND APPROACH OF POLICY 4**

#### **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.

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

TAYplan welcomes this support.

### **CONCLUSION**

TAYplan is satisfied that the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) and the Proposed Plan (2015) (Doc80) have appropriately considered issues of overcrowding.

TAYplan is not persuaded that any robust or compelling evidence has been provided of local circumstances which justify an increase in the housing land requirements for

Perth & Kinross in order to increase the overall generosity margin at TAYplan level. Considering generosity at TAYplan level fails to reflect that the generosity margin is applied by each respective Local Development Plan independently at housing market area level to reflect Map 4 (Doc80). TAYplan considers that applying the generosity margin at TAYplan level therefore presents a distorted picture and is unhelpful.

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 circumstances anticipated by the respondent. TAYplan considers that this will instead result in alternative circumstances with a strong potential to fundamentally risk delivery of the sustainable pattern of development needed to deliver the vision and Scottish Planning Policy (2014) paragraphs 40 and 76 to 83 (Doc84).

Neither Scottish Government nor any key government agency have sought changes or raised any issues relating to the interpretation or implementation of Scottish Planning Policy (2014) (Doc84) with regard to this issue.

TAYplan considers that all of the issues raised do not warrant any change to the Proposed Strategic Development Plan (May 2015) 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