

Issue (ref and heading):	Issue 017: Policy 4 Homes - Annual Housing Supply Targets and Housing Land Requirements – Dundee City and the Greater Dundee Housing Market Area	
Development plan reference:	Policy 4 Part A/Map 4 and supporting text, pages 24 and 25	Reporter: [For DPEA use only]
Body or person(s) submitting a representation raising the issue (including reference number):		
Seeking a change Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) Emac Planning LLP for Delson Contracts Ltd (846826) Emac Planning LLP for F M & G Batchelor (846821) Emac Planning LLP for J G Lang & Son (846827) Emac Planning LLP for Landvest PCC Ltd (910292) Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) Emac Planning LLP for R Watson & Son (846824)	Emac Planning LLP for Scotia Homes Ltd (910294) Emac Planning LLP for Stewart Milne Homes North Scotland (347277) Homes For Scotland (785148) Mr David Wardrop for Strategic Land (Scotland) Ltd/Iain Bett, Esq (752940) Springfield Properties (910130) Supporting as written Colliers International for Scottish Enterprise (835481) NHS Tayside (908896) Scottish Water (762198)	
Provision of the development plan to which the issue relates:		
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 focuses on Dundee City and the Greater Dundee Housing Market Area.		
Planning Authority's summary of the representation(s):		
<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. Topic Paper 2: Growth Strategy (2015) pages 39 to 42 (Doc104) explain this and the history of this area.</p>		
<p>Summary of Representations Seeking a change</p> <p><u>HOUSING LAND REQUIREMENT FOR THE WHOLE GREATER DUNDEE HOUSING MARKET AREA</u></p> <p>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 Landvest PCC Ltd (910292) PLAN2015_404, 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 seek an increase in the housing land requirement for the Greater Dundee Housing Market Area to 20% above the respective housing supply targets on the basis that the current approach 'fails to take the opportunity for a more generous growth'. Emac Planning LLP for</p>		

Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825)

PLAN2015_431 also suggest that this would provide for what they term 'a sustainable pattern of growth in close proximity to the city and services'.

These respondents also seek an increase in the housing land requirements for the remaining three Angus Housing Market Areas to 20% of their respective housing supply targets. This is to become what the respondents describe as 'consistent with the approach' for Dundee City/Greater Dundee HMA that they propose above and also because they consider this to 'ensure flexibility in housing land provision'. Issues relating to the housing supply targets and housing land requirement for Angus are considered separately in the Schedule 4 Summary of Unresolved Issues for Issue 014 Policy 4 Homes – Housing Supply Targets and Housing Land Requirements – Angus.

HOUSING SUPPLY TARGETS AND HOUSING LAND REQUIREMENT FOR DUNDEE CITY

Homes For Scotland (785148) PLAN2015_240, Springfield Properties (910130) PLAN2015_343, Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015_554, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015_432 and Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_534 seek an increase in the housing supply target for Dundee City to 120% of the need and demand indicated in the TAYplan-wide Joint Housing Need and Demand Assessment (Page 219 – Doc97) (from 480 to 576 homes per year) with a 10% generosity allowance giving a housing land requirement of 634 homes per year.

Note to Reporter - the figure from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) is 445 homes per year for Dundee City and not 480 homes per year. A later policy decision was taken to add 35 homes per year to Dundee City from the Perth & Kinross part of the Greater Dundee Housing Market Area. This increased the Dundee City housing supply target to 480 homes per year as stated in Main Issues Report (2014) options on page 29 to 30 and 33 to 35 (Doc56) Proposed TAYplan (2015) Policy 4/Map 4 (Doc80).

The respondents also consider that the evidence set out in the TAYplan Housing Analysis Paper Feb 2015 Page 30 (Doc100) and paragraph 6.93 of Topic Paper 2: Growth (2015) (Doc104) supports this proposed change. These contain TAYplan's analysis of the 2012-based projections which indicate that around 4,360 more households may form in Dundee City by the mid-2030s, compared with the 2010-based projection.

Homes For Scotland (785148) PLAN2015_240, Springfield Properties (910130) PLAN2015_343, Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015_554, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015_432 and Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_534 also suggest information in Figure 5 on page 16 of the TAYplan Housing Analysis Paper (2015) (Doc100) supports this. The respondents describe the data shown in the table below which shows anticipated build rates for the years 2016/17 to 2020/21 based on Dundee City Council's housing land audit (2014) (Doc32).

Year	Anticipated build rates
2016/17	802
2017/18	711
2018/19	708
2019/20	635
2020/21	593

Source: Dundee City Council Housing Land Audit 2014

These respondents report this as an average of 636 homes per year. The respondents consider that if these anticipated build rates are accurate then with their proposed housing supply target increase to 576 homes per year Dundee City could 'reasonably be expected to maintain a housing land supply that is in excess of the 5-year minimum expected by Scottish Planning Policy (2014)' (Doc84).

Note to Reporter – 636 is actually the average of anticipated build rates for the whole 7 year period for anticipated build from 2014/15 to 2020/21. The average for the 2016/17 to 2020/21 period described by the respondents is actually 690 homes per year.

Homes For Scotland (785148) PLAN2015_240, Springfield Properties (910130) PLAN2015_343 and Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015_554 also consider TAYplan's approach in Policy 4A/Map 4 and Policy 4E to represent what they term as 'hesitancy' over increasing the housing supply target for Dundee City. They suggest that this would be understandable if the 'evidence suggested the higher target would not be deliverable' but they consider their analysis of anticipated build rates (above) shows this is not the case.

Mr David Wardrop for Strategic Land (Scotland) Ltd/Iain Bett, Esq (752940) PLAN2015_450 proposes an increase in the housing supply target for Dundee City to 110% of the figure indicated in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Page 219 – Doc97). The respondent also proposes an increase in the housing land requirement to 'the maximum of an additional 20%'. The respondent considers this to provide an appropriate level of flexibility to ensure that the Dundee Local Development Plan can identify sufficient brownfield and greenfield land. The respondent suggests that these proposed increases would also compensate for the 'lower (90%) housing supply target that is being set for Perth & Kinross'.

Note to Reporter - the figure from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) is 445 homes per year for Dundee City and not 480 homes per year. A later policy decision was taken to add 35 homes per year to Dundee City from the Perth & Kinross part of the Greater Dundee Housing Market Area. This increased the Dundee City housing supply target to 480 homes per year as stated in Main Issues Report (2014) options on page 29 to 30 and 33 to 35 (Doc56) Proposed TAYplan (2015) Policy 4/Map 4 (Doc80).

REMOVE POLICY 4E

Homes For Scotland (785148) PLAN2015_240, Springfield Properties (910130) PLAN2015_343, Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015_554, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015_432 and Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_534 do not support TAYplan's approach of providing additional flexibility for Dundee City (Policy 4E – Doc80) to provide additional land above the housing land requirement in Policy 4A/Map 4 (Doc80) as a mechanism to respond to the issues the respondents raise (above) based on their analysis of the 2012-based population and household projections.

Instead they consider this to represent 'an additional 20% potential demand' and consider that this should be taken into account when setting the housing supply target, rather than when determining the housing land requirement.

The respondents also believe that setting the housing supply target and housing land requirement is the job of the Strategic Development Plans in city-regions, not a matter to be delegated in full or in part to constituent Local Development Plans based on Scottish Planning Policy (2014) Paragraph 118 and Diagram 1 (Doc84). They consider this to introduce a precedent for devolving these functions of a Strategic

Development Plan (wholly or in part) to Local Development Plan level. This issue is considered in more detail in the Schedule 4 Summary of Unresolved Issues for 021 Policy 4E. Matters relating to what the housing supply target and housing land requirement should be for Dundee City, including the role of Policy 4E, are considered in this Schedule 4 Summary of Unresolved Issues.

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'.

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:

HOUSING LAND REQUIREMENT FOR THE WHOLE GREATER DUNDEE HOUSING MARKET AREA

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 Landvest PCC Ltd (910292) PLAN2015_404, 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 the Greater Dundee Housing Market Area to 20% above the respective housing supply targets in Policy 4A/Map 4. They also seek an increase in the generosity of the remaining three Angus Housing Market Areas to 20% above the respective housing supply targets in Policy 4A/Map 4.

HOUSING SUPPLY TARGETS AND HOUSING LAND REQUIREMENT FOR DUNDEE CITY

Homes For Scotland (785148) PLAN2015_240, Springfield Properties (910130) PLAN2015_343, Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015_554, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015_432 and Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_534 propose an increase in the housing supply target for Dundee City to 576 homes per year with a 10% generosity allowance giving a housing land requirement of 634 homes per year.

Mr David Wardrop for Strategic Land (Scotland) Ltd/Iain Bett, Esq (752940) PLAN2015_450 proposes an increase in the housing supply target for Dundee City to be 10% above the figure indicted in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97). The respondent also proposes an increase in the housing land requirement to 'the maximum of an additional 20%' above the proposed new housing supply target.

Note to Reporter - the figure from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) is 445 homes per year for Dundee City and not 480 homes per year. A later policy decision was taken to add 35 homes per year to Dundee City from the Perth & Kinross part of the Greater Dundee Housing Market Area. This increased the Dundee City housing supply target to 480 homes per year as stated in Main Issues Report (2014) options on page 29 to 30 and 33 to 35 (Doc56) Proposed TAYplan (2015) Policy 4/Map 4 (Doc80).

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Summary of responses (including reasons) by Planning Authority:

Context

The TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) was declared 'robust and credible' by the Centre for Housing Market Analysis on 24 February 2014 (Doc54). The TAYplan Economic Outlook (2014) pages 32 to 36 (Doc98) supports the conclusions of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97). Both documents are summarised and discussed in Topic Paper 2: Growth (2015) pages 22 to 33 (Doc104).

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.

This persuaded TAYplan that it would be possible to accommodate all of the identified need and demand for new homes for Dundee City within the context of the existing strategy. This is largely on the basis that the Dundee Local Development Plan (2014) (Doc4) already plans for higher levels to deliver the same strategy. Therefore the two Main Issues Report (2014) housing options on pages 29 and 30 (Doc56) were identical for Dundee City (and also for North Fife and Angus).

The Main Issues Report (2014) also asked two specific questions relating to new homes in Dundee City on pages 33 and 34 (Doc56).

The first question considered the transfer of 35 homes per year from the Perth & Kinross part of the Greater Dundee Housing Market Area into Dundee City. Although this attracted comment at Main Issues Report (2104) stage no respondent has sought changes to this at Proposed Plan (2015) stage. The justification for this approach and the thinking behind it is discussed in Topic Paper 2: Growth (2015) pages 39 to 44 (Doc104) and TAYplan Housing Analysis Paper (2015) pages 55 to 61 (Doc100).

The second question considered how to respond to land becoming non-effective in parts of the Greater Dundee Housing Market Area outside of Dundee City. Many respondents at Main Issues stage questioned how such an approach would operate. TAYplan considered this in Topic Paper 2: Growth (2015) pages 50 to 52 (Doc104) and TAYplan Housing Analysis Paper (2015) pages 55 to 61 (Doc100). TAYplan was persuaded that the continuation of Approved TAYplan (2015) Policy 5B – now Proposed Plan (2015) Policy 4E – offered the opportunity to overcome some of these issues. Policy 4E is considered separately in the Schedule 4 Summary of Unresolved Issues for Issue 021 Policy 4E.

Following the Main Issues Report consultation (in 2014) TAYplan examined new information including the then recently published 2012-based population and household projections. This new information was considered in the TAYplan Housing Analysis Paper (2015) pages 25 to 41 (Doc100) and some of this is summarised in Topic Paper 2: Growth (2015) pages 45 to 52 (Doc104).

The 2012-based population and household projections did not replace the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97). They have also not been considered alongside a revised current housing need figure (also known as backlog need) within a robust and credible housing need and demand assessment and they have not been tested through a Main Issues Report. Therefore they served as a 'sense test' to help TAYplan to understand which Main Issues Report (2014) option for new homes (pages 29 – 30 Doc56) is most appropriate to plan for. This work is detailed in the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100). The next housing need and demand assessment will take place around 2017/18 and will use the 2014-based projections or even the 2016-based projections dependent on publication date.

TAYplan's analysis of the 2012-based population and household projections (Doc100) shows that there is some potential for a higher number of households in Dundee City than had previously been envisaged. The same information showed no equivalent situation for other council areas, in fact it showed the opposite. TAYplan concluded that there may be a potential need for Dundee City to plan for higher levels of growth.

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).

All of these factors combined meant that the Proposed Plan needed to express a housing supply target and a housing land requirement. There was also a need to consider the potential implications of the 2012-based projections and balance the risk of over allocating land should the 2012-based projections not come about with the risk of failing to have sufficient flexibility to cope should they actually occur.

The housing supply target for Dundee City is 480 homes per year. This meets the identified need and demand for new homes from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) page 219 (Doc97). It also incorporates 35 homes per year transferred to Dundee City from the Perth & Kinross part of the Greater Dundee Housing Market Area described in the TAYplan Housing Analysis Paper (2015) pages 55 to 61 (Doc100).

The housing land requirement for Dundee City stated in Policy 4/Map 4 (Doc80) is 10% above the housing supply target. This is discussed in TAYplan Housing Analysis Paper (2015) pages 41 to 48 (Doc100). However, this is accompanied by Policy 4E. Although Policy 4E serves several purposes, in this context it provides flexibility to respond to the 2012-based population and household projections should the need arise prior to the next review of TAYplan. Policy 4E continues the current approach from Approved TAYplan Policy 5B (Doc16) of allowing Dundee City only, to plan for more homes. This also provides the mechanism to respond to the 2012-based projections, should they arise, without over-allocating. Policy 4E (Doc80) is discussed in more detail the Summary of Unresolved Issues for Issue 021 Policy 4 Part E.

TAYplan considers this to provide the appropriate mechanism to achieve the balance in risks of over allocation versus lack of flexibility to respond (described above). In particular this approach allows Dundee City to consider the implications of more up to date information before concluding its own proposed plan. For example since the

TAYplan Proposed Plan (2015) (Doc80) was published the mid-year population and housing estimates for Dundee City for 2014 have been published (017/Extract/1). Both show a lower trajectory of growth than was anticipated in the 2012-based projections.

TAYplan agrees that Dundee City is a place that could accommodate more homes in the future; particularly through the redevelopment of brownfield sites within the city. After all it is the largest city in the region (Scotland's fourth largest) and Policies 1 and 4 (Doc80) are written to support this principle. However, TAYplan does not agree that the methods proposed by respondents represent the best way to achieve this or that the respondents have provided any compelling or robust evidence to support their proposed changes.

Authority's Response To Proposed Changes

HOUSING LAND REQUIREMENT FOR THE WHOLE GREATER DUNDEE HOUSING MARKET AREA

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 Landvest PCC Ltd (910292) PLAN2015_404, 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

TAYplan agrees that the housing land requirement set out in Map 4 does not plan for 'more generous growth'. This is because, by virtue of currently planning for a 10% generosity margin in Policy 4A/Map 4 (Doc80), it does not do something else. However, Policy 4E does provide further flexibility for Dundee City.

TAYplan considers that the issue is not whether Map 4 does or does not plan for 'more generosity' than the respondents would like, but what justification they can provide to support the proposed changes they seek. The respondents have not provided any robust or compelling evidence to support their proposed changes or to refute TAYplan's conclusions.

There is an important distinction to make between what the respondents are seeking and what is written in the Proposed Plan (2015) Policy 4/Map 4. The respondents treat Dundee City in the same way as the whole Greater Dundee Housing Market Area. However, Policy 4/Map 4 and Policy 4E specifically distinguish between Dundee City and the rest of the Greater Dundee Housing Market Area.

This distinction reflects the conclusions of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) pages 219 (Doc97) and the TAYplan Housing Analysis Paper (2015) pages 25 to 61 (Doc100).

The respondents seek an increase in the housing land requirement for the Greater Dundee Housing Market Area to 20%. Policy 4/Map 4 currently sets out housing land requirements of 10% for the four local authority parts of the Greater Dundee Housing Market Area. Policy 4E provides increased flexibility for Dundee City only.

Policy 4E applies to Dundee City only and continues the current approach in approved TAYplan (2012) Policy 5B (Doc16). This is also justified on the basis that the analysis of the 2012-based population and household projections considered in the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100). This indicates the potential for Dundee City to experience higher household growth. Policy 4E (Doc80) remains a relevant and helpful approach to respond to what may arise as a result.

However, no such evidence is apparent for Angus, North Fife or Perth & Kinross, including their respective parts of the Greater Dundee Housing Market Area. The 2012-based projections indicate similar or lower levels of new households would be expected compared with those in Policy 4/Map 4. This suggests that even with a fall in average household size the housing supply targets and housing land requirements set out in Policy 4/Map 4 remain appropriate. Therefore the evidence does not support an equivalent application of Policy 4E for elsewhere in the Greater Dundee Housing Market Area and nor does it support any increase in the housing land requirement for the Greater Dundee Housing Market Area as a whole, or its constituent parts in Angus, North Fife and Perth & Kinross. No respondent has provided any evidence to refute this conclusion.

Many of these respondents have used the analysis of the 2012-based population and household projections from the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100) to justify their proposals. However, elsewhere in other representations many of these same respondents have ignored its consequent impact for the other three council areas (outside of Dundee City – including their parts of the Greater Dundee Housing Market Area) by either proposing increases to housing supply targets and housing land requirements there or by accepting the existing housing supply targets. This represents a selective use of the evidence. This is particularly noted for comments made in the Schedule 4 Summary of Unresolved Issues for Issues 016: Policy 4 Homes covering housing supply targets and housing land requirements in Perth & Kinross.

Similarly the respondents have also assumed that the 2012-based population and household projections automatically justify a higher housing land requirement for Dundee City. However, TAYplan does not agree. The 2012-based projections are trend-based and will only occur if the trends of the most recent 5 years continue. This is not necessarily likely and the respondents have not considered this issue. For example the recently published mid-year population and household estimates for 2014 suggest a lower trajectory of growth than was envisaged by the 2012-based projections (Doc100). These are illustrated in the TAYplan Housing and Demography Update Paper (017/Extract/3). This therefore suggests that the potential for further growth envisaged by the 2012-based projections is not taking place, or at least is not taking place yet. This challenges the arguments put forward by the respondents.

It is for this reason that Policy 4/Map 4 deliberately sets out a 10% housing land requirement for Dundee City with the capacity to identify more land under Policy 4E (Doc40). This fulfils the requirements of Scottish Planning Policy (2014) Paragraph 116 (Doc84) and also enables Dundee City Council to consider more up to date information regarding population and household changes in their Local Development Plan. This is a fundamental pillar of responding to circumstances where more land for homes may be needed in response to the 2012-based projections but also to circumstances where it may not be needed because the 2012-based projections have not occurred.

In this way the respondents have failed to consider the overall implications for the Vision of delivering their proposed changes in the way they seek. Similarly they have not provided any robust or compelling evidence to demonstrate why their proposed changes would better deliver the Vision. TAYplan is satisfied that the approach set out in Policy 4A/Map 4 and Policy 4E (Doc80) provides the appropriate mechanism to achieve the outcomes sought by the respondents but, crucially, without the risk of over allocating land or preventing a response to changing circumstances.

The respondents have therefore provided no compelling or robust evidence to support the changes they seek or to refute the conclusions reached by TAYplan. TAYplan is therefore not persuaded that there is any basis to make the changes sought and nor is TAYplan persuaded that the changes would be better at delivering the vision. In fact TAYplan is concerned that the proposed changes could conflict with the location priorities in Policy 1 (Doc80) which are integral to delivering the sustainable pattern of development demanded by the vision.

As such TAYplan does not agree with the view of **Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015_431** that the proposed changes would provide for what they term 'a sustainable pattern of growth in close proximity to the city and services'. This is not a guaranteed outcome of the changes proposed by this and other respondents, rather it is a possibility. There is also the possibility that a sustainable pattern of development will not be the outcome of the proposed changes.

Policy 1 (Doc80) already focuses the majority of new development, including homes, in principal settlements and these are defined in Policy 1A (Doc80). Policy 4F (Doc80) limits development in areas surrounding Dundee City and works in conjunction with Policy 1C (Doc80). This means that there may be instances where development on the edge of Dundee City is still within principal settlements or may reflect the caveats in Policy 1C and Policy 4F (Doc80). However, TAYplan does not share the respondent's more general assumption that edge of Dundee City locations will automatically result in the 'sustainable pattern of development' they describe. The respondents have provided no further detail or evidence to back up their assertion.

TAYplan is therefore satisfied that the current approach provides sufficient flexibility to respond to change whilst also recognising the potential for growth in Dundee City. The respondents have provided no compelling or robust evidence to refute TAYplan's conclusions and therefore TAYplan is satisfied that no changes should be made to Policy 4 and Map 4 (Doc80).

TAYplan's comments made above are also relevant to the proposed changes to housing land requirements for all housing market areas in Angus, including the South Angus part of the Greater Dundee Housing Market Area. These are considered separately in the Schedule 4 Summary of Unresolved Issues for Issue 014 Policy 4 Homes – Housing Supply Targets and Housing Land Requirements – Angus.

HOUSING SUPPLY TARGETS AND HOUSING LAND REQUIREMENT FOR DUNDEE CITY

and

POLICY 4E

Homes For Scotland (785148) PLAN2015_240, Springfield Properties (910130) PLAN2015_343, Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368) PLAN2015_554, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015_432 and Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_534

The respondents appear to justify their proposed changes on the analysis of the 2012-based population and household projections from the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100) and anticipated future build rates from the Dundee City Housing Land Audit (2014) page 7 (Doc32) – also considered in the TAYplan Housing Analysis Paper (2015) pages 13 to 18 (Doc100).

The respondents consider there to be '20% extra demand' for homes in Dundee City. However, this 20% does not correspond with any analysis of the 2012-based population or household projections set out in the TAYplan Housing Analysis Paper

(2015) pages 25 to 41 (Doc100). Looking in particular at TAYplan Housing Analysis Paper (2015) Figure 15 page 38 (Doc100) neither of the figures in the first two columns (the Proxy Exercise or the CHMA Tool Rerun) is 20% different from the figures in the remaining two columns (MIR Options 1 and 2) for Dundee City. Yet this analysis appears to be the basis for the scale of change proposed by the respondents.

Therefore the respondents appear to be arguing that any 20% generosity margin should be instead added to the housing supply target. This is not consistent with Scottish Planning Policy (2014) paragraph 116 (Doc84). Again this also does not reflect 2012-based population and household projections as considered in the TAYplan Housing Analysis Paper (2015) pages 25 to 41 (Doc100). TAYplan's response in Policy 4A/Map 4 and Policy 4E (Doc80) deliberately recognises that the scale of additional households may be in excess of 20% and therefore the respondents' proposed changes appear to ignore this and be rather more rigid than they might first suggest.

Having not carried out a new housing need and demand assessment based on the 2012-based projections it is impossible for the respondents to argue that 20% would be the resultant extra demand for new homes. As noted in the TAYplan Housing Analysis Paper (2015) in the orange box on page 35 (Doc100), there has also been no recalculation of current housing need (also known as backlog housing need) for Dundee City. Therefore the 2012-based projections are a 'sense test' and cannot be considered as a replacement for the housing need and demand assessment. The next TAYplan Housing Need and Demand Assessment, anticipated during 2017/18, will use the 2014-based or 2016-based population and household projections.

This shows that the respondents have failed to properly consider the evidence TAYplan has presented and how this has been applied. The context section above explains this evidence and its application in more detail. Neither the respondents nor TAYplan can be certain whether the 2012-based population and household projections will occur. TAYplan considers this to reinforce its current position for two reasons:

1. This shows the importance of balancing the flexibility to provide more homes should this be necessary with the risks of over allocating should it not be necessary. This is reinforced by the recent publications of the mid-year population and household estimates for 2014 (Doc100). These show lower rates of growth than anticipated by the 2012-based projections. Prior to the next housing need and demand assessment and TAYplan review Dundee City Council will be best placed to consider new information for future years and determine whether to use the flexibility offered by Policy 4E to respond to these or other changes when preparing its Proposed Local Development Plan.

2. TAYplan fulfils Scottish Planning Policy (2014) paragraph 116 (Doc84) by stating a housing land requirement of 10% and provides flexibility to respond further should it be necessary through Policy 4E for Dundee City only; itself a continuation of the current approach. This also allows Dundee City to plan for land releases in excess of the 20% above the housing supply target described in Scottish Planning Policy (2014) paragraph 116 (Doc84), should there be evidence to support this.

Many of the same respondents have also sought increases in the housing land requirement and/or housing supply targets for other housing market areas (above and in other council areas) despite the same 2012-based projections analysis demonstrating a potential reduction in the anticipated need and demand for new homes in all areas outside of Dundee City. This represents an inconsistent application of the evidence. TAYplan does not support this approach of using the evidence only for Dundee City and ignoring how the same evidence applies in the

other locations where the respondents seek the opposite outcome.

Therefore the respondents have provided no compelling or robust evidence to refute TAYplan's conclusions or, in particular, to justify how additional housing land requirement under Policy 4E (Doc80) automatically translates to '20% additional demand' and therefore a 20% higher housing supply target or higher housing land requirement.

The other element of the respondents' justification is Dundee City Housing Land Audit (2014). This shows the actual and anticipated build rates as at March 2014, which are also considered by the TAYplan Housing Analysis Paper (2015) pages 13 to 19 (Doc100).

Housing Land Audit data tells us how much housing land the respective local authority considers to be effective within its area each year. It is only ever a snapshot and changes each year based on a fresh audit process. The housing land audit process is not the pretext for determining housing supply targets but does help us appreciate whether they are realistically deliverable. This is an important distinction.

This helped TAYplan to understand the scale of transition from currently low build rates and what local authorities envisaged as the pace of that transition based on their discussions with land owners and house builders. This is a fundamental component of considering wider economic, social and environmental factors and capacity, resources and deliverability as set out in Scottish Planning Policy (2014) paragraph 115 (Doc84). However, the respondents appear to have used the TAYplan's analysis of housing land audits in the TAYplan Housing Analysis Paper (2015) pages 13 to 19 (Doc100) differently and instead to justify their proposed changes to housing supply targets.

The respondents all suggest that their proposed increases (resulting in a housing land requirement of 634 homes per year) corresponds almost identically with the anticipated average build rate for the years 2016/17 to 2020/21 taken from the Dundee City Housing Land Audit (2014) page 8 (Doc32) which they state to be 636 homes per year. These figures are illustrated in Table 1 overleaf.

However, 636 homes per year is not the average for these five years, it is the average for the completions projected over the 7 year period from 2014/15 to 2020/21.

In the TAYplan Housing Analysis Paper (2015) pages 13 to 19 (Doc100) TAYplan analyses both recent completions and future anticipated build rates. This shows that build rates fell severely from 2008 during the economic downturn. In 2014 there was still no evidence that build rates had recovered in Dundee City and analysis of the more recently published Dundee Housing Land Audit (2015) also shows that completions in the year 2014/15 had not recovered and had not reached projected levels, although they had increased on the preceding year (see Table 1 below).

The comparatively higher anticipated build rates are also partly explained on the basis that some of the land that was not used during the economic downturn (described above) but is now projected to come forward during the next few years. This is logical and was anticipated by the approved TAYplan (2012) Policy 5 footnote (Doc16). It is also anticipated by the Proposed Plan (2015) Policy 4 footnote (Doc80). Table 1 (overleaf) shows that when taken in the context of the approved TAYplan (2012) Policy 5A (Doc16) some of the build rates that are anticipated post 2016/17 are contributing to some of the homes planned for the 2012-24 period (the first 12 years of the approved TAYplan 2012). However, there were lower build rates in the early years as the country went through the economic downturn.

As some context it is important to remember that the approved TAYplan (2012) Policy 5 contains the requirements for Dundee City to plan for 610 homes per year and this is set out in the Dundee Local Development Plan (2014). Table 1 (overleaf) shows build rates in Dundee City from 2012/13 onwards; the first year of the approved TAYplan (2012). Table 1 also shows the anticipated build rates from 2014/15 to 2020/21. All of these are taken from the 2014 Dundee Housing Land Audit which is directly comparable with the TAYplan Housing Analysis Paper (2015) pages 13 to 19 (Doc100).

TAYplan does not agree that this provides the justification for a higher housing supply target for Dundee City Council. It simply explains the in 2014 housing land audit Dundee City Council anticipated annual build rates of this level. Recent housing completion rates have yet to show such a level of output.

Dundee City Council (like other councils) prepares a housing land audit for each financial year. This provides an annual snapshot of recent build and anticipated build rates for the future. The 2015 Housing Land Audit (Doc33) shows a different picture of anticipated completions. The build rates in the most recent anticipated years have fallen compared with what had been expected in 2014 and the anticipated average build rate for the period has fallen also.

The respondents are also only examining one 7 year period which does not cover all of the first 12 years of either the approved TAYplan (2012) or the Proposed Plan (2015). It is therefore not a solid basis, on its own, from which to draw the conclusions they have done since there is no evidence presented to show the situation expected in the remaining years. This is why TAYplan only used the housing land audit figures to understand the scale of transition and its likely pace.

TABLE 1: Actual completions and anticipated build rates per year

	TAYplan (2012) build rates for Dundee City	Dundee Housing Land Audit 2014 - Homes		Dundee Housing Land Audit 2015 - Homes	
2012/13	610	147	Actual Completions	147	Actual Completions
2013/14	610	168		168	
2014/15	610	307	Anticipated Build Rates	210	Anticipated Build Rates
2015/16	610	693		364	
2016/17	610	802		611	
2017/18	610	711		811	
2018/19	610	708		709	
2019/20	610	635		670	
2020/21	610	593		666	
2021/22	610	na		646	
Average	610	529		500	

Source: Dundee City Council Housing Land Audit 2014 and TAYplan (2012) Policy 5

Housing supply targets in the Proposed Plan (2015) Policy 4A/Map 4 (Doc80) are therefore not predicated on the basis of housing land audits, as implied by the respondents. The fact that higher build rates are anticipated in future years has as much to do with slow build rates during the economic downturn since 2008 and the recovery of the economy as they do with anything else. The respondents fail to acknowledge this. Therefore TAYplan is not persuaded that this evidence justifies higher housing supply targets. TAYplan instead considers this to reflect what is acknowledged in the Policy 4 Footnote (Doc80) - that build rates will be lower in the early years and higher in the later years. Although anticipated by the Dundee Housing Land Audit 2014 (Doc32) the Dundee 2015 Housing Land Audit (Doc33)

shows that these rates have not yet been delivered since 2008.

Based on housing land audit figures TAYplan agrees that Dundee City could 'reasonably be expected to maintain a housing land supply that is in excess of the 5-year minimum expected by Scottish Planning Policy (2014)'. This would be consistent with approved TAYplan (2012) Policy 5B (Doc16) and the proposed continuation of this in Proposed Plan (2015) Policy 4E (Doc80) since both allow Dundee City to plan for higher build rates. This would reflect the situation sought by Policy 1 (Doc80) to concentrate the majority of new development in principal settlements.

Elsewhere several of the same respondents propose the removal of Policy 4E. They consider that this hands responsibility for setting the housing land requirement to Dundee City which they argue is contrary to Scottish Planning Policy (2014) paragraph 118 (Doc84). They also seek to apply Policy 4E (Doc80) to all areas.

Policy 4A/Map 4 (Doc80) is consistent with Scottish Planning Policy (2014) Paragraph 118 (Doc84) because it includes a specific housing land requirement for Dundee City. There is also no evidence to support the application of Policy 4E to other areas since the 2012-based projections do not show any equivalent potential for more households outside of Dundee City. This is covered in more detail in the Schedule 4 Summary of Unresolved Issues for 021 Policy 4E.

The 2014 mid-year population and household estimates are each lower than was projected for 2014 in the respective 2012-based population and household projections (017/Extract/1 and 017/Extract/2). Although it is not possible to say how long this will continue and what future years will hold it is clear that there is some rationale to TAYplan's recognition that the 2012-based projections are a sense test and that they do not represent what will happen but instead what may happen should recent trends continue.

Therefore TAYplan considers that Policy 4E (Doc80) allows Dundee City Council to identify in its next Local Development Plan more land to provide for additional homes should this be necessary. Policy 4E also allows Dundee City to plan for more than 20% in excess of the housing supply target stated in Policy 4A/Map 4 (Doc80). TAYplan considered this to be particularly important because if the 2012-based projections were to come about then this may be necessary. The changes proposed by the respondents would limit this. TAYplan therefore considers its current approach through Policy 4A/Map 4 and Policy 4E to represent the most practical and flexible way of ensuring that a strategic policy framework exists to respond to the 2012-based projections should they arise but prevents the risks of over allocating land should they fail to do so. This is, in TAYplan's view, the best method of delivering the vision in response to whatever demographic and household changes then take place.

The respondents have therefore presented an inconsistent argument based on what TAYplan considers to be an incorrect and limited interpretation of TAYplan's analysis of the 2012-based population and household projections. They have then used housing land audit information with a similar scale of anticipated house building. TAYplan does not consider this to represent compelling or robust evidence and neither is TAYplan persuaded that this refutes the analysis set out in the TAYplan Housing Analysis Paper (2015) pages 12 to 48 (Doc100). The respondents have also failed to explain how their proposed change would be better placed to deliver the vision. This is particularly given that they also seek contradictory changes to housing supply targets/land requirements elsewhere and the abolition of Policy 4E which is designed to respond to the very thing – the 2012-based projections – that they use, albeit inconstantly, to justify many of their proposed changes sought to wider housing policy.

TAYplan does not agree that its approach represents 'hesitancy' rather than that it represents a logical and pro-active position based on a full and proper understanding of the 2012-based projections. TAYplan considers it to be entirely appropriate therefore to set 10% housing land requirement for Dundee City and give Dundee City Council the flexibility (through Policy 4E) to respond further where necessary.

TAYplan considers that planning on the basis of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) page 219 (Doc97) represents a robust and credible understanding of the future anticipated need and demand for new homes. The TAYplan Housing Analysis Paper (2015) (Doc100) has considered the 2012-based projections which only raise potential issues for Dundee City the actual evidence for which is not yet apparent. TAYplan considers that housing supply targets and housing land requirement are appropriate and generous and reflect the requirements of Scottish Planning Policy (2014) paragraphs 115, 116 and 118 (Doc84). The continuation of the current approach through Policy 4E enables Dundee City to respond to a variety of situations that require additional land for new homes in a manner that is consistent with vision and spatial strategy of the Proposed Plan.

**Mr David Wardrop for Strategic Land (Scotland) Ltd/Iain Bett, Esq (752940)
PLAN2015_450**

The respondent proposes a slightly different change compared with those above because they seek a 10% increase in the housing supply target (to 528 homes per year) with a 20% housing land requirement (634 homes per year).

All of the points raised above directly apply in response to the proposed changes sought by this respondent. Nevertheless no compelling or robust evidence has been provided to support the proposed change or to refute TAYplan's conclusions.

The respondent suggests that these proposed increases would also compensate for the 'lower (90%) housing supply target that is being set for Perth & Kinross'. TAYplan does not agree that this is the case or that it should form any basis to support or justify the respondent's proposed changes.

The housing supply targets for Perth & Kinross are justified based on the evidence presented in the TAYplan Housing Analysis Paper (2015) (Doc100) including consideration of likely build rates. This is consistent with the approach set out in Scottish Planning Policy (2014) paragraph 115 (Doc84) which recognises the importance of considering wider economic, social and environmental factors and capacity, resources and deliverability. TAYplan is satisfied that this remains appropriate and is also reinforced by more recent work by Perth & Kinross Council. All of these factors are considered in more detail in the Schedule 4 Summary of Unresolved Issues for Issue 016 Policy 4 Housing Supply Targets & Housing Land Requirement for Perth & Kinross.

There is no requirement or expectation that the residual 10% of identified need and demand for Perth & Kinross from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) page 219 (Doc97) should be transferred to other parts of the region and specifically to Dundee City. There is also no evidence to suggest that this is necessary. The only circumstance in which some homes have been transferred from Perth & Kinross to Dundee City is for the Perth & Kinross part of the Greater Dundee Housing Market Area. This was based on specific evidence set out in Topic Paper 2: Growth (2015) pages 41 to 44 (Doc104) and the TAYplan Housing Analysis Paper (2015) pages 55 to 61 (Doc100). This transfer has no relationship to the 10% referred to by the respondent.

TAYplan notes however that the respondent appears to agree with TAYplan, and some other respondents, that planning for 100% of identified need and demand for new homes in Perth & Kinross would be unlikely to be met.

TAYplan is not persuaded that any compelling or robust evidence has been presented to justify the proposed changes.

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.

Scottish Water (762198) PLAN2015_269

TAYplan welcomes this support.

CONCLUSION

TAYplan agrees that Dundee City is a place that could accommodate more homes in the future. It is the largest city in the region and Policies 1 and 4 (Doc80) are written to support this principle. However, TAYplan does not agree that the methods proposed by respondents represent the best way to achieve this.

The respondents have made a series of inter-related points and arguments to support changes in the number of new homes planned (housing supply targets) and the generosity of land supply (housing land requirement). However they have based these responses on weak and inconsistent use of the evidence. The cases they present are neither robust nor compelling and do not present a persuasive argument to make the changes they seek or that their proposed changes would be better placed to deliver the vision. TAYplan considers there to be fundamental risks to the vision by identifying more land for housing without a proven case that it will either be delivered or that there is a demonstrable need and demand for it. Doing so may result in homes being built in different places but not necessarily more homes overall. Such an outcome has the potential to adversely affect the sustainable pattern of development needed to deliver the vision and Scottish Planning Policy (2014) paragraph 40 and 76 to 83 (Doc84).

The use of the 2012-based population and household projections by the respondents is weak and inconsistent in how they apply the conclusions geographically. Their use of the housing land audit information relies on the presence of similar figures which represent one snap shot in time and fails to consider the broader economic, social and environmental factors and capacity, resource and deliverability issues considered by TAYplan. The respondents also fail to properly consider the implications of their proposed changes on the vision and delivery of other elements of the Plan.

Taken together with the other changes sought to housing policy by many of the same respondents the combined result would be a weaker plan whose capacity to deliver all elements of the vision, as set out in other policies, would be severely undermined.

All of this persuades TAYplan that both the housing supply targets and housing land requirement set out in Map 4 (and operating in conjunction with Policy 4E for Dundee City only) would ensure that there are sufficiently generous land supplies being identified in future Local Development Plans and specifically for Dundee City.

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 Dundee City. 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).

No key government agency or Scottish Government themselves have sought changes or raised any issues relating to the interpretation or implementation of Scottish Planning Policy (2014) (Doc84).

TAYplan therefore 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