

TAYplan Strategic Development Plan Authority

Summary of Unresolved Issues (Schedule 4)

Issue: 019 Policy 5 Housing – Policy 5 Part A Range and Mix of Housing Including Affordable

Contents

1. Summary of Unresolved Issues
2. Copy of actual representations pertinent to this issue (<i>Personal details have been redacted. Full details have been provided to the DPEA separately.</i>) <ul style="list-style-type: none">• All representations include any attachments submitted by the respondent.• Where representations were submitted in hard copy or by email these were entered into TAYplan's online system and all material originally submitted has been attached and appears here with the representation.
3. Library of documents <ul style="list-style-type: none">• All documents and extracts referred to in the representation and/or the Schedule 4 are either contained in the library attached to this Schedule or where over 50 pages within the Core Library (separate folders).

1. Summary of Unresolved Issues

Issue: 019 Policy 5 Housing – Policy 5 Part A Range and Mix of Housing Including Affordable		
Development plan reference:	Page 17 Policy 5 Part A Bullet Point 2 and associated Page 16 supporting text	Reporter: [Note: DPEA use only]
Body or person(s) submitting a representation raising the issue and representation reference		
Seeking a change		
ID Number	Person/Organisation	Representation Reference
548526	Architecture and Design Scotland	PLAN791
548117	Dundas Estates & Development Co	PLAN466
445201	Emac Planning for A&J Stephen	PLAN707
548522	Emac Planning for A&J Stephen Ltd/Bett Homes Ltd	PLAN752
548522	Emac Planning for A&J Stephen Ltd/Bett Homes Ltd	PLAN754
445204	Emac Planning for Angus Estates Ltd	PLAN624
548523	Emac Planning for Bett Homes Ltd	PLAN771
445206	Emac Planning for J G Lang & Son	PLAN538
445203	Emac Planning for James Keiller Estates Ltd	PLAN718
548383	Emac Planning for L Porter	PLAN569
548360	Emac Planning for M Batchelor (B)	PLAN532
548301	Emac Planning for M Batchelor (K)	PLAN525
445205	Emac Planning for Mr R Watson	PLAN512
548524	Emac Planning for Stewart Milne Homes	PLAN787
445159	Geddes Consulting for Thomson Homes	PLAN892
543112	GS Brown Construction	PLAN87
548389	Halliday Fraser Munro for Barratt Homes	PLAN591
442882	Homes for Scotland	PLAN221
346689	Karen Clark for Discovery Homes	PLAN203
443973	Lynne Palmer	PLAN161
343111	Montagu Evans for Wallace Land Investment Management	PLAN329
548760	Mrs D Jeffrey	PLAN809
344887	Penny Uprichard	PLAN879
545597	Professor Charles McKean	PLAN148
453889	Royal Burgh of St. Andrews Community Council	PLAN914
453889	Royal Burgh of St. Andrews Community Council	PLAN923
453889	Royal Burgh of St. Andrews Community Council	PLAN924
442871	Smiths Gore for Errol Park Estate	PLAN675
442870	Smiths Gore for Mansfield Estates	PLAN557
547750	St. Andrews Preservation Trust	PLAN844
Support as written		
ID Number	Person/Organisation	Representation Reference
423150	Braes of the Carse Conservation Group	PLAN24
445161	Montgomery Forgan Associates for Morris Leslie Group	PLAN644
527724	Mr David Dykes	PLAN480
406092	Mr Ken Russell	PLAN34
547710	NHS Tayside	PLAN300
Provision of the development plan to which the issue relates:	The mix of housing type, size and tenure to meet the needs and aspirations of a range of different households throughout their lives and the quality of homes and neighbourhoods.	

SUMMARY OF REPRESENTATIONS SEEKING A CHANGE

PRINCIPLE OF QUALITY AND MIX OF HOMES

Architecture and Design Scotland (548526) Suggests modifications explaining what is meant by '*neighbourhood as unit of delivery*'. These should enable neighbourhood scale and housing capacity to be determined at local level in response to local contexts. This would ensure delivery of infrastructure and for low carbon conditions from the outset. It would also ensure that the form of development '*locks in*' the requirements of Policy 2.

Lynne Palmer (443973) considers that the Plan should include more examples of '*poor quality housing like bedsits*' and needs more public discussion on good quality.

Professor Charles McKean (545597) suggests additional text to ensure the provision of '*housing at the bottom of the ladder*' to stimulate the economy of '*burgh centres*'.

Mrs D Jeffrey (548760) considers that TAYplan should not hold back good quality development such as new settlements because people do not want '*huge extensions*' to their villages. The respondent asserts that if new settlements are considered, everything will be new so that existing infrastructure (e.g. water and drainage) would not be tapped into, burdening the fabric of it further. [This is also covered in Issue 003: Policy 1 Part A Settlements; and, 004: Policy 1 Part B Text and General each covering Policy 1 Location Priorities and Issue 017 covering Policy 5C Presumption Against Land Releases].

DELIVERING AFFORDABLE HOUSING

Smiths Gore for Errol Park Estate (442871) and Mansfield Estates (442870); Homes for Scotland (442882); Dundas Estates & Development Co (548117); Montagu Evans for Wallace Land Investment Management (343111); and, Emac Planning for (Mr R Watson (445205); M Batchelor (B) (548360); M Batchelor (K) (548301); L Porter (548383); J G Lang & Son (445206); James Keiller Estates Ltd (445203); A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522) (PLAN752 and PLAN754); Angus Estates Ltd (445204); Bett Homes Ltd (548523); and for Stewart Milne Homes (548524)): Propose modifications to give clear instructions to the Local Housing Strategies and Local Development Plans to prevent confusion and mis-interpretation at the stage of delivery. They suggest that the list of options within Planning Advice Note 2/2010 should not be '*cherry-picked*', or put in order of preference because a variety of options may emerge for each site and that all parties should engage early in the process to create a solution that meets identified needs in the Housing Need and Demand Assessment. They also suggest the need for flexibility and innovative approaches in the delivery of affordable housing given the '*current economic climate*'.

Geddes Consulting for Thomson Homes (445159) point out that the guidance in the Proposed Plan to Local Development Plans on affordable housing should reflect Scottish Planning Policy paragraph 86 if an affordable housing shortage exists based on the approved Housing Need and Demand Assessment. They suggest that the Proposed Plan needs to provide this additional guidance to ensure consistency across the region, given that the Housing Need and Demand Assessment has been used to set the overall strategic housing requirement which in turn will set the level of affordable housing to be delivered, depending on the proportion of affordable homes adopted in each Local Development Plan affordable housing policy. They also note that Scottish Planning Policy paragraph 86 allows for sites of 100% affordable housing.

GS Brown Construction (543112) consider that affordable housing envisaged in Planning Advice Note 74 and, even Planning Advice Note 2/2010, is '*founded on an assumption of builders working in partnership with Registered Social Landlords who are but now almost completely without funds and cannot work in step with house builders as envisaged*'. They consider this '*mis-match*' will become more acute as private sector build rates increase and suggest clarifying expectations of the industry in either the Strategic or Local Development Plans.

Halliday Fraser Munro for Barratt Homes (548389) propose modifications to Policy 5 Part A Bullet Point 2 to define the types of acceptable affordable housing given difficulties in sourcing finance and explanation of how this can be delivered to ensure equity and fairness across the TAYplan region. They consider that a much more flexible approach must be adopted for the specific requirements and constraints of each site recognising advice from Scottish Government that '*local authorities...consider the full range of [affordable housing] options and apply them as appropriate*' (Planning Advice Note 2/2010 Paragraph 5).

Karen Clark for Discovery Homes (346689) proposes extending the principle that the housing figures do not hold back good quality development to the choice and range set out in Policy 5 Part A Bullet Point 2. This is so that housing numbers do not limit the opportunity to improve the range, choice and location of housing sites within the principal settlements.

AFFORDBALE HOUSING THRESHOLDS AND DELIVERY

St. Andrews Preservation Trust (547750) considers that affordable housing needs should be articulated in the Proposed Plan for St. Andrews. They consider there has been too much '*executive*' housing despite the need for affordable housing and that it has '*forced some to commute into St Andrews*'. They support provision of 30% affordable housing [Fife Structure Plan 2009].

As half the St. Andrews population are students they consider these housing needs cannot be ignored. They assert that many family homes have been converted into multiple occupancy to house students because there are '*insufficient student residences to accommodate rising numbers of undergraduates*'.

Penny Uprichard (344887) asserts that '*no affordable housing*' has been built in Fife since 2006 despite the requirement for 30% to be delivered alongside market development. She also points out that under this approach '*for every 3 affordable homes St. Andrews will have imposed on it 7 market homes*'. She considers this to be '*too much*' because St. Andrews '*cannot sustain*' this rate of growth without impacting on the prospective green belt and the landscape.

Royal Burgh of St. Andrews Community Council (453889) (PLAN 914) consider that the planning system has failed to deliver adequate affordable housing to the detriment of St. Andrews. They also note that the threshold for affordable housing in St. Andrews is 30% when the TAYplan-wide Housing Need and Demand Assessment (2010) lower range identifies a need and demand 2,050 housing solutions per year of which 58% are affordable housing. They consider that the system needs to change to require plans to differentiate between locations for affordable and market housing.

Royal Burgh of St. Andrews Community Council (453889) (PLAN923)

The respondent suggests deleting some supporting text on Page 16 Paragraph 6 because they consider the role of the construction sector to be '*to maximise profits*' and that to include this sentence may be saying that the aims of the Proposed Plan are unachievable.

The respondent suggests deleting Page 16, Bullet Point 4 regarding *'housing figures not holding back good quality development'*. This is considered to *'incite'* Local Development Plans to allocate considerably more housing land than is implied by an *'already generous housing land requirement'*. It is also considered to open the door to planning consent for piecemeal applications for land not specified in the development plan. This is considered to run contrary to Policy 2F and the 29 October 2010 letter to Heads of Planning by Chief Planner Jim Mackinnon saying *'Where a planning authority has a 5 year supply of effective housing land but the impediment to developing that site is the general availability of mortgages or low level of demand from purchasers then there will be little if anything to be gained by releasing additional sites.'* And as set out in TAYplan Housing Provision Analysis Paper (2010) (p.26) *"If the economic recovery is slower or unevenly distributed it could be as damaging to the Plan's locational objectives to provide for too much housing as it would be to provide for too little."*

Royal Burgh of St. Andrews Community Council (453889) (PLAN924)

The respondent suggests modifying Policy 5 Part A Bullet Point 2 to require the housing type, size and tenure mix to broadly match the proportions of need and demand identified in the TAYplan-wide Housing Needs and Demand Assessment (Appendix 4) (2010). This would be to *'attempt to make operational what will otherwise be a pious but unrealised hope'*.

The respondent suggests further modifying Change Policy 5 Part A Bullet Point 2 setting out local authority level percentages which affordable housing delivery should exceed: 85% in Angus; 65% in North Fife and 70% in Perth and Kinross. This is considered because, with the exception of Dundee City, it is primarily the need for affordable housing that is driving the calculations given in the TAYplan-wide Housing Needs and Demand Assessment (2010).

SUMMARY OF REPRESENTATIONS SUPPORTING AS WRITTEN

Braes of the Carse Conservation Group (423150) supports Policy 5.

Montgomery Forgan Associates for Morris Leslie Group (445161) support Policy 5 Part A Bullet Point 2 because they consider a site they are promoting at Perth Airport, which includes a mix of housing densities and tenures to be important.

Mr David Dykes (527724) supports the aims for quality but queries who will decide what good quality is.

Mr Ken Russell (406092) supports principle of mixed use development particularly other neighbourhood uses such as places of worship or others covered by Use Class 10.

NHS Tayside (547710) support the requirement for a mix of housing to meet different needs and aspirations and emphasis on affordable housing to recognise the broad differences in housing needs within the region.

Modifications sought by those submitting representations:

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

PRINCIPLE OF QUALITY AND MIX OF HOMES

Architecture and Design Scotland (548526) proposed modifications to:

- **Policy 5 Part A** as follows: *'Allocate a minimum.....by 2015 to enable balanced, resilient economic growth, fit for the place, through the delivery of sustainable neighbourhoods. Land should be allocated.....to assist in the delivery of the order of 26,000 units up to year 2024 through the consolidation and creation of sustainable neighbourhoods, in the appropriate locations, to clear parameters of urban form with the engagement of citizens and stakeholders'*.

- **Policy 5 Part A Bullet Point 2** as follows: *'Ensure that the mix of housing type, size.....including the provision of an appropriate level of affordable housing based on defined local need, co-ordination with service delivery agencies; the provision of an appropriate level of sustainable neighbourhood infrastructure, and, a clear, costed and funded long term maintenance and management strategy'*.

Lynne Palmer (443973) implies modifications to include more examples, specifically of poor quality homes.

Professor Charles McKean (545597) proposes the addition of: *'to provide houses at the bottom of the ladder and social housing, in order to stimulate the economy of burgh centres and to support regional economic growth'*.

Mrs D Jeffrey (548760) implies a modification which supports the deliver of better quality housing through new settlements.

DELIVERING AFFORDABLE HOUSING

Homes for Scotland (442882); Dundas Estates & Development Co (548117); Montagu Evans for Wallace Land Investment Management (343111); Smiths Gore for Errol Park Estate (442871) and for Mansfield Estates (442870); and, Emac Planning for (A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522) (PLAN752 and PLAN754); Angus Estates Ltd (445204); Bett Homes Ltd (548523); and for Stewart Milne Homes (548524)): Propose adding to the end of **Policy 5 Part A Bullet point 2** the sentence:

'Given the reduction in public funding opportunities for affordable housing providers, local authorities should engage with developers at an early stage to identify ways of delivering affordable housing, as set out in Planning Advice Note 2/2010. The full range of options should be incorporated into Local Housing Strategies, and there should be no hierarchy of delivery.'

Emac Planning for (Mr R Watson (445205); M Batchelor (B) (548360); M Batchelor (K) (548301); L Porter (548383); J G Lang & Son (445206); and, James Keiller Estates Ltd (445203)): Propose the adding to the end of **Policy 5 Part A Bullet point 2** the sentence:

'the provision of an appropriate level of affordable housing based on defined local needs.' They also propose the follow on sentence: *'Early engagement will be encouraged to identify ways of delivering affordable housing, as set out in Planning Advice Note 2/2010.'*

Geddes Consulting for Thomson Homes (445159) propose modifying **Policy 5 Part A Bullet Point 2** to say:

'Targets for affordable housing for each housing market area should be set by Local Development Plans, taking account of the guidance in the local authority's Local Housing Strategy where there is an identified affordable housing shortfall. Local Development Plans should identify this shortfall taking account of the findings from the approved Housing Need and Demand Assessment'.

GS Brown Construction (543112) implies modifications to Policy 5 or inclusion in Local Development Plans of expectations on the industry.

Halliday Fraser Munro for Barratt Homes (548389) propose modifications to define acceptable affordable housing, delivery methods and a flexible approach recognising that there will be different options.

Karen Clark for Discovery Homes (346689) implies a modification to **Policy 5 Part A Bullet Point 2** such that housing numbers in Proposal 2 do not limit opportunity to provide a range, choice and location of housing sites within the principal settlements.

AFFORDABLE HOUSING THRESHOLDS AND DELIVERY

St. Andrews Preservation Trust (547750) imply modifications to include affordable housing targets, possibly of 30%, in Policy 5 and to include a framework to deal with student housing needs and homes of multiple occupation.

Penny Uprichard (344887): No specific modifications identified.

Royal Burgh of St. Andrews Community Council (453889) (PLAN923) proposed modifications to:

- Delete **Page 16 paragraph 6:** *"From a place shaping perspective the construction sector will need to provide housing that meets the quality requirements and the needs and aspirations of a range of different households, including low cost housing."*
- Delete **Page 16 bullet point 4:** *"The critical issue for the quality agenda is to ensure that the housing figures themselves do not hold back good quality development that delivers the objectives of this Plan".*

Royal Burgh of St. Andrews Community Council (453889) (PLAN924) proposed modifications to **Page 17, Policy 5 Part A Bullet Point 2** to: *"ensure that the mix of housing type, size and tenure broadly matches the proportions of need and demand identified in the Housing Needs and Demand Assessment (Appendix 4)".*

And to:

"Local Development Plans will need to set affordable housing requirements for each housing market area (or appropriate sub-area), noting that the calculations on which the housing land requirement is based imply that the percentage of affordable housing should exceed 85% in Angus, should exceed 65% in North Fife and should exceed 70% in Perth and Kinross."

Summary of responses (including reasons) by Planning Authority:

RESPONSE TO REPRESENTATIONS SEEKING A CHANGE

Provision in Policy 5 to ensure a mix of housing type, size and tenure reflects one of the Proposed Plan objectives. This is designed to meet the needs and aspirations of a range of different households throughout their lives. It acknowledges the role of housing in shaping better quality places and improving the competitiveness of the region. These issues are also covered in Topic Paper 2: Growth Strategy (June 2011) (CL/Doc31) and Topic Paper 4: Place Shaping (June 2011) (CL/Doc33). Achieving quality through effective resource management, better quality places and sustainable economic growth will be the consequences of individual development at neighbourhood and settlement level but the cumulative outcomes are strategic in their significance. Dealing with them at strategic level as set out in Policies 2 and 5 also provides strategic consistency for Local Development Plans and for development proposals. This is integral to delivering the spatial strategy set out in Policies 1, 3 and 5 and Proposal 2 because the quality of place and the mix of housing type, size and tenure influence choices in the housing market as noted in Topic Paper 2: Growth Strategy (June 2011) Paragraph 5.15 and TAYplan Monitoring Statement (2010) Figure 5.4, Page 51 (019/SL/Doc27) and Figure 5.35, Page 79 (019/SL/Doc28).

PRINCIPLE OF QUALITY AND MIX OF HOMES

Architecture and Design Scotland (548526): TAYplan supports the sentiments of these comments but consider that they are already covered by Policy 2 which, like other policies, should be read in conjunction the Policy 5. These are also explained within Topic Paper 4: Place Shaping (June 2011) Section 5 (019/SL/Doc34), Section 7 (019/SL/Doc35), and Appendix 1 (019/SL/Doc36).

Lynne Palmer (443973): The proposed modifications are not considered to provide any additional clarity to Pages 16 and 17 as written.

Professor Charles McKean (545597): Housing at 'the bottom of the ladder' is one part of providing for a 'range of housing type size and tenure' as already set out in Policy 5 Part A Bullet Point 2.

Mrs D Jeffrey (548760): The suggestion that better quality housing will be derived from new settlements as opposed to other locations is not accepted and would conflict with Policy 1, and Policy 5 Part A and potentially with Policy 3. These aim to make the best use of existing infrastructure within principal settlements and also do not, as suggested, promote increasing villages by '3 or 4 times'. A clear framework for development outside principal settlements is set out in Policies 1 and 5 Part C. The Proposed Plan aims to maximise the capability of existing infrastructure ahead of new.

DELIVERING AFFORDABLE HOUSING

Homes for Scotland (442882); Dundas Estates & Development Co (548117) and GS Brown Construction (543112); Montagu Evans for Wallace Land Investment Management (343111); Smiths Gore for Errol Park Estate (442871) and for Mansfield Estates (442870); Emac Planning for A&J Stephen (445201); A&J Stephen Ltd/Bett Homes Ltd (548522) (PLAN752 and PLAN754); Angus Estates Ltd (445204); Bett Homes Ltd (548523); Stewart Milne Homes (548524); Mr R Watson (445205); M Batchelor (B) (548360); M Batchelor (K) (548301); L Porter (548383); J G Lang & Son (445206); and, James Keiller Estates Ltd (445203); Geddes Consulting for Thomson Homes (445159); Halliday Fraser Munro for Barratt Homes (548389): The references in Policy 5, Page 16 supporting text and the Proposed Plan objectives to providing a 'range of housing type, size and tenure' recognise the importance of this in meeting a variety of needs and aspirations for different households throughout their lives. It is also part of a wider approach recognising the role of good quality homes and neighbourhoods in improving the competitiveness of the region and supporting the regeneration of towns and cities, as acknowledged in Topic Paper 2: Growth Strategy Paragraphs 5.14 and 5.15 (019/SL/Doc33). It also recognises that affordable housing is part of the solution, rather than the only solution, to delivering better quality neighbourhoods and to tackling market exclusion.

The range of different types of affordable housing that can be delivered through Development Plans and Local Housing Strategies; the methods for deploying these; and, the expectations on the building industry and public authorities have already been described Scottish Planning Policy (2010) paragraphs 86 to 91 (019/SL/Doc32) and Planning Advice Note 2/2010 paragraphs 5 to 30 (019/SL/Doc29). The proposed modifications are considered to repeat this guidance and add text that is already covered by the Proposed Plan as written or raise issues that will be covered in Local Development Plans/Local Housing Strategies. Such amendments would not support the approach of Circular 1/2009 Page 4 Paragraph 14: 'Scottish Ministers expect Strategic Development Plans to be concise, visionary documents...' (019/SL/Doc25). The Proposed Plan sets the overall framework for and scale of housing development within which Local Development Plans will operate and consider local circumstances.

Karen Clark for Discovery Homes (346689) and Royal Burgh of St. Andrews Community Council (453889) (PLAN923) Page 16 Bullet Point 4 specifically emphasises the importance of shaping better quality places in delivering the Proposed Plan objectives. It is also there to explain to the reader that decisions on planning proposals which are good quality (reflecting Policy 2) and meet the other requirements of the Plan should not be refused simply because of the scale of housing provided to date. It is possible that over-providing homes could be as

damaging to the Policy 1 Location Priorities as under-providing. Therefore the Proposed Plan should be read as a whole. In operating Page 16 Bullet Point 4 it will be for local authorities to judge whether Policy 2 requirements have been appropriately met and the provision of such housing would not adversely impact on other aspects of the Plan. The proposed deletion would remove this clarity and raise questions from users about the operation of Policy 5 adding uncertainty. This should not be deleted and, along with other policies, already explains the circumstances within which a range of housing can be provided.

AFFORDABLE HOUSING THRESHOLDS AND DELIVERY

St. Andrews Preservation Trust (547750):

Student housing associated with the region's universities are specific local issues for Dundee and St. Andrews. The granting of licences for Homes of Multiple Occupation resides with the respective local authorities and it is for them to determine if circumstances are appropriate to grant these. Although this issue is apparent in two parts of the region it is not strategic in scale and is not cross-boundary in nature. The circumstances in both Dundee and St. Andrews differ because each place is different and any strategy to deal with this is best considered by each local authority. Also sufficient guidance is already provided in Scottish Planning Policy (2010) Paragraph 89 (019/SL/Doc32) and Circular 8/2009 Houses in Multiple Occupation (019/SL/Doc26).

Penny Uprichard (344887) did not seek specific modifications but commented along with ***Royal Burgh of St. Andrews Community Council (453889) (PLAN914)*** on the delivery of affordable housing in St. Andrews. The Strategic Development Planning Authority is not in a position to alter the legislative framework through which affordable housing is delivered.

Royal Burgh of St. Andrews Community Council (453889) (PLAN923):

Page 16 paragraph 6 links the role of the construction sector in delivering Policy 5 with the quality requirements set out in Policy 2. This adds clarity and reminds the construction sector of its responsibilities within the context of the vision and objectives. Its deletion would diminish the clarity of these expectations and imply that this important emphasis has not been made when it actually has.

Royal Burgh of St. Andrews Community Council (453889) (PLAN924) and St. Andrews Preservation Trust (547750): The TAYplan-wide Housing Need and Demand Assessment (2010) Appendix 4 (019/SL/Doc21) already considers the backlog and anticipated requirement for affordable and market housing. Market exclusion, and other problems related to affordability, will not always be solved just by building more affordable homes. However, affordable housing does form part of the approach in Policy 5 Part A Bullet Point 2 to provide for a 'range of housing, type, size and tenure'. It is for Local Development Plans and Local Housing Strategies to determine the appropriate scale and proportion of affordable housing to be provided with new market development and other solutions detailed in Planning Advice Note 2/2010 paragraph 5 (019/SL/Doc29). Scottish Planning Policy (2010) paragraph 88 (019/SL/Doc32) envisages a 25% affordable to 75% market housing ratio. It also recognises that if the Housing Need and Demand Assessment justifies it then a different level could be used. This has been explained in Topic Paper 2: Growth Strategy (June 2011) Paragraphs 5.11 to 5.14 (019/SL/Doc33) which accepts that setting regional targets and thresholds for affordable housing would fail to recognise the significant variation and interconnectedness of different parts of the region. This is also acknowledged by Scottish Planning Policy (2010) paragraph 87 (019/SL/Doc32). Instead Policy 5 requires Local Development Plans to set out affordable housing requirements, where applicable, at Housing Market Area level based on defined local needs. These needs will be identified through the Housing Need and Demand Assessment and Local Housing Strategies as acknowledged in Scottish Planning Policy (2010) paragraph 86 (019/SL/Doc32). Policy 5 Part A Bullet Point 2 is consistent with Scottish Planning Policy (2010) paragraphs 86 to 88 (019/SL/Doc32) and as such **Scottish**

Government (443918) has sought no changes to this aspect of the Proposed Plan.

RESPONSE TO REPRESENTATIONS SUPPORTING AS WRITTEN

Braes of the Carse Conservation Group (423150); NHS Tayside (547710); Montgomery Forgan Associates for Morris Leslie Group (445161); Mr David Dykes (527724); and Mr Ken Russell (406092): TAYplan welcomes the support for Policy 5.

Montgomery Forgan Associates for Morris Leslie Group (445161)

Although Perth Airport is within the Perth Core Area proposals would be determined against Development Plan policies.

Mr David Dykes (527724): The Proposed Plan defines the measures of good quality as part of the location, design and layout of development. The strategic locational elements are covered in Policies 1, 3, 4, 5, 6 and 7. More detailed issues relating to location, design and layout are covered from a strategic perspective by Policy 2.

Mr Ken Russell (406092): Mixed use development could include other neighbourhood uses such as places of worship or others covered by Use Class 10 (019/SL/Doc15). This will be a matter for Local Development Plans and for Local Authorities in determining planning proposals.

CONCLUSIONS

This is a long term plan and the approach already set out within Policy 5 Part A Bullet Point 2 and on Page 16 Supporting Text provides appropriate flexibility in delivering housing (including affordable housing) which fits well with other objectives of the Proposed Plan and is consistent with Scottish Planning Policy (2010) (CL/Doc2) and Planning Advice Note 2/2010 (019/SL/Doc1). TAYplan considers that the proposed modifications would reduce the clarity and certainty that is presently provided to users of the Plan; and unnecessarily repeat national policy and guidance or add superfluous text. Therefore TAYplan considers that all of the issues raised do not warrant any change to the Proposed Plan (June 2011) and propose that the elements dealt with in this Schedule 4 Summary of Unresolved Issues remain as written and unchanged.

Reporter's conclusions:

[Note: For DPEA use only]

Reporter's recommendations:

[Note: For DPEA use only]

2. Copy of representations pertinent to this issue

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