

<b>Issue (ref and heading):</b>	Issue 014: Policy 4A and Map 4 Annual Housing Supply Targets and Housing Land Requirements - Angus	
<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> Emac Planning LLP for Delson Contracts Ltd (846826) Emac Planning LLP for F M & G Batchelor (846821) Emac Planning LLP for Landvest PCC Ltd (910292) Emac Planning LLP for R Watson & Son (846824) Emac Planning LLP for Scotia Homes Ltd (910294) Emac Planning LLP for J G Lang & Son (846827)		Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) Monifieth Community Council (910377) Ryden for Barratt North Scotland (910146) Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701)  <b>Supporting as written</b> NHS Tayside (908896) Colliers International for Scottish Enterprise (835481) 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 are set out for each constituent council area to provide clarity for the respective Local Development Plans. This Schedule relates specifically to Angus Council area.		
<b>Planning Authority's summary of the representation(s):</b>		
Note to Reporter: For clarity Dundee City is the same as Dundee City Council's administrative area. This is one part (the largest part) of the Greater Dundee Housing Market Area. The Greater Dundee Housing Market Area is bigger than Dundee City and covers all of Dundee City and some parts of all three local authorities which surround it. The South Angus part of the Greater Dundee Housing Market Area includes the settlements of Carnoustie, Monifieth and Muirhead/Birkhill. Monifieth and Muirhead/Birkhill are part of the Dundee Core Area (see Policy 1 Part A). There are also some smaller settlements within this area that are not principal settlements and are not part of the Dundee Core Area in Policy 1 Part A. Topic Paper 2: Growth Strategy (2015) pages 39 to 42 (Doc104)		
<b>Summary of Representations Seeking a change</b> <b><u>INCREASE IN HOUSING LAND REQUIREMENT FOR ALL ANGUS HOUSING MARKET AREAS</u></b> 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 requirements for the Greater Dundee Housing Market Area (including South Angus) and the other three Angus Housing Market Areas to 20% of their respective housing supply targets. This is so as to become what the respondents describe as 'consistent with the approach' for Dundee City/Greater Dundee HMA that		

they also propose. They consider this to 'ensure flexibility in housing land provision'. Issues relating to the housing supply targets and housing land requirement for Dundee are considered separately in the Schedule 4 Summary of Unresolved Issues for Issue 017 Policy 4 Homes – Housing Supply Targets and Housing Land Requirements – Dundee City and the Greater Dundee Housing Market Area.

### **SOUTH ANGUS PART OF THE GREATER DUNDEE HOUSING MARKET AREA**

**Monifieth Community Council (910377) PLAN2015\_562** is concerned about the scale of proposed housing development in Monifieth related to the existing infrastructure in Monifieth. The respondent has not specifically proposed changes but asks for this matter to be considered.

**Ryden for Barratt North Scotland (910146) PLAN2015\_387** seeks an increase in the housing supply target for the South Angus part of the Greater Dundee Housing Market Area. They note that the housing supply target in Policy 4/Map 4 (Doc80) is smaller than the equivalent figure in the approved TAYplan (2012) Policy 5 (Doc16).

They consider this proposed change is supported by Scottish Planning Policy (2014) paragraph 116 (Doc84) which 'requires the allocation of a generous supply of land for housing in order to provide flexibility for the continued delivery of housing'. They also suggest that this is needed even if what they describe as 'unpredictable changes to the effective land supply' occur during the 'life time of the plan'.

They also feel that this would promote population increase in the area and suggest that this is 'key to maintaining viable communities, ensuring adequate infrastructure and for economic development and success.'

The respondent also notes that the South Angus part of the Greater Dundee Housing Market Area has a lower housing supply target than many other parts of the TAYplan area. Given that this area is part of the Greater Dundee Housing Market Area the respondent does not consider this to be 'logical'. They also do not consider that this supports the role of Monifieth as a tier 1 principal settlement. They therefore consider that the increase in housing supply targets they propose would support the delivery of Policy 1 (Doc80). The same respondent makes related points in relation to Policy 1 and these are considered in the Schedule 4 Summary of Unresolved Issues for Issue 004 Policy 1B Sequential Approach.

### **NORTH ANGUS HOUSING MARKET AREA**

**Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701) PLAN2015\_314** seeks an increase in the housing supply target for the North Angus Housing Market Area stated on Map 4 (Doc80). They note that this is smaller than the equivalent figure in the approved TAYplan (2012) Policy 5 (Doc16).

They consider that Scottish Planning Policy (2014) paragraph 116 (Doc84) supports this because they consider it 'requires the allocation of a generous supply of land for housing in order to provide flexibility for the continued delivery of housing'. They also feel that this would promote population growth and make up for 'any shortfall from the failure to develop any constrained sites'.

The respondent further considers that more homes are justified for Montrose on the basis of Scottish Planning Policy (2014) paragraph 109 (Doc84) which says that the 'provision of new homes should be made in areas where economic development is planned'. They cite the Montrose Port Strategic Development Area (Policy 3) as an example to support this view.

The respondent suggests that the housing supply target for Highland Perthshire should be reduced and the residual homes transferred to North Angus Housing Market Area instead. The respondent bases their justification for this on the size of

population and role of settlements in the Policy 1 settlement hierarchy (Doc80). They consider the housing supply targets for Highland Perthshire to be excessive and inconsistent with what they term 'the theme of TAYplan'. [TAYplan considers this to mean the vision and outcomes].

The respondent also cites Topic Paper 2: Growth (2015) [page 4 paragraph X] (Doc104) which they interpret to say that 'only 50 to 55%' of the housing supply targets in Perth & Kinross will be met. The respondent compares this with 100% in Angus.

## **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:**

## **Proposed Changes**

### **INCREASE IN HOUSING LAND REQUIREMENT FOR ALL ANGUS HOUSING MARKET AREAS**

**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 all Angus Housing Market Areas including the South Angus part of the Greater Dundee Housing Market Area to 20% above the respective housing supply targets in Policy 4A/Map 4.

### **SOUTH ANGUS PART OF THE GREATER DUNDEE HOUSING MARKET AREA**

**Monifieth Community Council (910377) PLAN2015\_562** has not specifically sought changes but asks for the relationship between new homes and infrastructure in Monifieth to be considered.

**Ryden for Barratt North Scotland (910146) PLAN2015\_387** propose an increase to the housing supply target for the South Angus part of the Greater Dundee Housing Market Area.

### **NORTH ANGUS HOUSING MARKET AREA**

**Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701) PLAN2015\_314** propose an increase in the housing supply target for North Angus Housing Market Area with a corresponding reduction in the housing supply target for the Highland Perthshire Housing Market Area.

## 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 Angus within the context of the existing strategy. This is largely on the basis that the Proposed Angus Local Development Plan (2015) (Doc77) 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 Angus (and also for Dundee City and North Fife).

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) (Doc84).

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 Angus is 310 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). The housing land requirement for Angus 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). This includes the South Angus part of the Greater Dundee Housing Market Area and the other three housing market areas in Angus.

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

### **INCREASE IN HOUSING LAND REQUIREMENT FOR ALL ANGUS HOUSING MARKET AREAS**

**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**

The housing land requirement set out in Map 4 plans for a 10% generosity margin for each of the four housing market areas that cover Angus. This is supported by the evidence presented in the TAYplan Housing Analysis Paper (2015) pages 41 to 48 (Doc100).

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 between what the respondents are seeking and what is written in the Proposed Plan (2015) Policy 4/Map 4. The respondents treat the whole Greater Dundee Housing Market Area in the same way as Dundee City. However, all of Policy 4 and Map 4 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 whole 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 plans allows for more land to be identified for Dundee City only because of the potential of more households being projected by the 2012-based household projections. 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 in Angus compared with the identified need and demand for new homes taken from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) pages 219 (Doc97) as set out in Policy 4/Map 4 (Doc80). 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 (Doc80) remain appropriate. Therefore the evidence does not support any increase in the housing land requirement for any area outside of Dundee City, including the South Angus part of the Greater Dundee

Housing Market Area. No respondent has provided any evidence to refute this conclusion.

It is for this reason that Policy 4/Map 4 (Doc80) deliberately sets out a 10% housing land requirement for Angus. This fulfils the requirements of Scottish Planning Policy (2014) Paragraph 116 (Doc84) because local circumstances demonstrate this as shown in the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100).

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 would conflict with the location priorities in Policy 1 (Doc80) which are an integral part of delivering 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.

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 (including some within Angus) will automatically result in the 'sustainable pattern of development' they describe. The respondent has provided no further detail or evidence to back up their assertion.

TAYplan's comments made above are also relevant to the proposed changes to housing land requirements for Dundee City and the Greater Dundee Housing Market Area. These are considered separately in the Schedule 4 Summary of Unresolved Issues for Issue 017 Policy 4 Homes – Housing Supply Targets and Housing Land Requirements – Dundee.

### **SOUTH ANGUS PART OF THE GREATER DUNDEE HOUSING MARKET AREA**

#### **Monifieth Community Council (910377) PLAN2015\_562**

Policy 4 (Doc80) sets out the scale of new homes planned for the South Angus part of the Greater Dundee Housing Market Area. This is based on work set out in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) and the TAYplan Housing Analysis Paper (2015) (Doc100).

Under Policy 1 (Doc80) Monifieth is one of the principal settlements where most of 70 new homes per year for this area will be concentrated. The exact scale and the locations for new housing are a matter for Angus Council's Local Development Plan.

TAYplan agrees that infrastructure to support new homes and neighbourhoods is fundamental to delivering successful and sustainable places. As such Policy 2 (Doc80) includes requirements for development to design-in new infrastructure and Policy 6 (Doc80) sets out the approach for developer contributions towards this. It will be for Councils to determine the specific requirements through Local Development Plans and to seek these when considering planning applications. It will also be for Councils to determine whether infrastructure constraints can be overcome or whether they mean that development in specific locations may not be appropriate.

### **Ryden for Barratt North Scotland (910146) PLAN2015\_387**

The respondent has used the terms housing supply targets and housing land requirements loosely and interchangeably. Scottish Planning Policy (2014) paragraph 116 (Doc84) is specifically about land (housing land requirement) not housing supply targets (number of homes). Housing supply targets are not the generosity part and therefore an increase (as proposed) in these will not lead to or be justified by generosity elements of Scottish Planning Policy (2014) (Doc84). Policy 4/Map 4 (Doc80) already includes an element of generosity which is described as the housing land requirement in Map 4. The approved TAYplan (2012) Policy 5 (Doc16) sets out planned build rates (equivalent to housing supply targets) but does not stipulate the scale of generosity to be added. Instead it sets out that Local Development Plans should identify sufficient land to ensure a generous supply of effective housing sites to provide choice and flexibility.

The respondent has correctly observed that the housing supply target figure in Proposed Plan (2015) Policy 4/Map 4 (Doc80) is lower than the figure in approved TAYplan (2012) Policy 5 (Doc16). However they have not specified what scale of increase they seek, where it would come from or on what basis it should be justified. The observation that it is lower than in the current plan does not provide adequate justification for either of these.

The Housing Supply Targets are the result of the considering major pieces of evidence contained in the robust and credible TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) and the TAYplan Housing Analysis Paper (2015) (Doc100). No justification has been provided by the respondent to counter any of the evidence presented in these documents. The housing land requirement is based on a methodology set out in TAYplan Housing Analysis Paper (2015) pages 41 to 48 (Doc100). The housing supply target and housing land requirement for a given area are not based on the presence of any principal settlement. The identification of sites to accommodate the housing land requirement is through Local Development Plans in accordance with Policy 1 (Doc80) which focuses most new development in the respective principal settlements.

South Angus forms part of the Greater Dundee Housing Market Area. Therefore it is not directly comparable with other housing market areas. For its housing supply target to increase there would need to be a corresponding decrease elsewhere in the Greater Dundee Housing Market Area. Also the sites to accommodate this would need to reflect the location priorities set out in Policy 1 (Doc80). It would then be for Angus Council's Local Development Plan to determine whether Monifieth or indeed other principal settlements are best placed to accommodate this in accordance with Policy 1 (Doc80).

Monifieth is a principal settlement within the Dundee Core Area and as such would be one of the places expected to accommodate a large share of the growth planned for the South Angus part of the Greater Dundee Housing Market Area. This is a continuation of the approved TAYplan (2012) Policy 1 and Policy 5 (Doc16). TAYplan is not aware of any evidence which suggests that Angus Council has failed to do this in its Proposed Local Development Plan and the respondent provides no evidence in regard to this.

TAYplan is therefore satisfied that there is no compelling or robust evidence to support the case for increasing the housing supply target for South Angus. TAYplan is also satisfied that the current approach for providing a generous land supply is appropriate and that Policy 1 works clearly in conjunction with Policy 4 (Doc80).

TAYplan is therefore not persuaded that there is any basis upon which to make the proposed changes.

## **NORTH ANGUS HOUSING MARKET AREA**

### **Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701) PLAN2015\_314**

This respondent made almost identical points in their response to the TAYplan Main Issues Report (2014) (Doc56). In particular relating to their proposed increase in the housing supply target for North Angus Housing Market Area resulting from a corresponding decrease in the housing supply targets for the Highland Perthshire Housing Market Area. This is set out on pages 60 and 67 (sections J) of the Schedule of Responses to the Main Issues Report (February 2015) (Doc83).

The respondent has used the terms housing supply targets and housing land requirements loosely and interchangeably. Scottish Planning Policy (2014) paragraph 116 (Doc84) is specifically about land (housing land requirement) not housing supply targets. Housing supply targets are not the generosity part and therefore an increase (as proposed) in these will not lead to or be justified by generosity elements of Scottish Planning Policy (2014) (Doc84). Policy 4/Map 4 (Doc80) already includes an element of generosity which is described as the housing land requirement. For North Angus Housing Market Area this is 83 homes per year (10% above the respective housing supply target). The approved TAYplan (2012) Policy 5 (Doc16) sets out planned build rates (equivalent to housing supply targets) but does not stipulate the scale of generosity to be added. Instead it sets out that Local Development Plans should identify sufficient land to ensure a generous supply of effective housing sites to provide choice and flexibility.

The respondent has correctly observed that the housing supply target figure in Proposed Plan (2015) Policy 4/Map 4 (Doc80) for North Angus is lower than the figure in approved TAYplan (2012) Policy 5 (Doc16). However they have not specified what scale of increase they would seek. The observation that the housing supply target in Map 4 (Doc80) is lower than in the current plan does not provide adequate justification for an increase.

The Housing Supply Targets are the result of considering major pieces of evidence contained in the robust and credible TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) and the TAYplan Housing Analysis Paper (2015) (Doc100). No justification has been provided by the respondent to counter any of the evidence presented in these documents. The housing land requirement is based on a methodology set out in TAYplan Housing Analysis Paper (2015) pages 41 to 48 (Doc100). The housing supply target and housing land requirement for a given area is not based on the presence of any principal settlement. The identification of sites to accommodate this through Local Development Plans is in accordance with Policy 1 (Doc80).

The fact that Highland Perthshire may contain only tier 3 settlements or the comparative size of its current population is not relevant. The same could be said of other housing market areas. Policy 4/Map 4 (Doc80) already plans to accommodate all of the identified need and demand for new homes in the North Angus Housing Market Area. It is therefore unclear what additional need or demand would justify the proposed increase in housing supply targets.

The respondent is therefore (intentionally or otherwise) proposing to meet the housing needs of Highland Perthshire Housing Market Area in the North Angus Housing Market Area on the opposite side of the TAYplan area. TAYplan has already established a framework to overcome environmental and infrastructure constraints using Policy 4D (Doc80). However, the operation of this would be that any housing land requirement from Highland Perthshire would be met in one or more of its three neighbouring housing market areas with Perth & Kinross only. This would only take place in well justified instances of serious environmental and infrastructure constraint.

This would be limited to no more than 15% of the housing land requirement for Highland Perthshire. One of the principal reasons for this limit is concern about meeting the indigenous need and demand for new homes within the housing market area where it originates. This is one of the reasons why Policy 4D only allows the transfer to take place between neighbouring housing market areas within the same council area. The details about this approach are explained in TAYplan Housing Analysis Paper (2015) pages 55 to 61 (Doc100). It is therefore unclear what circumstances would justify the transfer of any of the housing land requirement to North Angus, which is separated from it by 2 large and rural housing market areas and is in another planning authority. The respondent has not provided any justification to explain this.

The fact that Topic Paper 2: Growth (2015) page 4 paragraph x (Doc104) notes that there is some possibility that only '50 to 55%' of the housing supply targets in Perth & Kinross may be met has no bearing on housing supply targets in the North Angus housing market area. Using the respondent's approach could just as easily mean that any housing market area could accommodate all or a share of the increase they are proposing. This prompts the question why North Angus in particular? The respondent has not presented any evidence relating to this issue. For clarity TAYplan is not advocating this approach but is explaining the potential inconsistencies with the approach that has been proposed by the respondent.

The basis for the suggested transfer from Highland Perthshire to North Angus is therefore crude and lacks evidence. It also fails to acknowledge the basis upon which the housing supply targets and housing land requirement have been formulated. There is no evidence to suggest that higher levels of generosity would be needed in North Angus or that the proposed change would be the optimal method of achieving this.

The respondent rightly observes that Policy 3 (Doc80) includes Montrose Port and also that there are proposals in Map 10 (Doc80) for a regional rail freight facility based on the Tactran Regional Transport Strategy (2008) Delivery Plan page 16 item J3 (Doc95). However, this does not automatically translate into an increased housing supply target. The respondent has provided no evidence to make a clear or compelling case that there will be a significantly higher than anticipated growth in the number of households as a consequence of these proposals.

When preparing the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) considerable time was given to considering the implications of the currently stalled growth in the offshore industry, including around Montrose. This was considered in the TAYplan-wide Joint Housing Need and Demand Assessment (2013) Chapter 2 pages 122 to 141 (Doc97). It was concluded that the existing presence of a considerable workforce with offshore expertise along the A90/A92 corridor, south of Aberdeen in particular, meant that such growth would not result in the sudden and significant need for new homes above and beyond what has already been identified. The economic thinking and scenario conclusions from the TAYplan-wide Joint Housing Need and Demand Assessment (2013) are also reinforced by the TAYplan Economic Outlook (2014) pages 32 to 36 (Doc98) which was prepared by Oxford Economics on TAYplan's behalf.

TAYplan agrees that the respondent has correctly identified a passage of text from Scottish Planning Policy (2014) paragraph 109 (Doc84). TAYplan considers its strategy already incorporates this recognition and does not see that this automatically means more homes should be planned than already have been for North Angus. The scale planned in Montrose itself is a matter for the Angus Local Development Plan. The respondent has not provided any evidence to respond to or counter these conclusions.

Proposed Plan (2015) Policy 4/Map 4 has set out housing supply targets and housing land requirements for the North Angus Housing Market Area based on robust and credible evidence. It is for Angus Council to determine how much of this is accommodated in the two principal settlements in North Angus – Brechin and Montrose. Again the respondent provides no evidence to respond to this.

TAYplan is therefore satisfied that there is no robust or compelling evidence to support the case for increasing the housing supply target for North Angus. TAYplan is also satisfied that the current approach to providing a generous land supply are appropriate and that Policy 1 works clearly in conjunction with Policy 4 (Doc80).

TAYplan is therefore not persuaded that there is any basis upon which to make the proposed changes.

## **Authority's Responses 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 with the importance of considering infrastructure alongside new homes and is satisfied that the Proposed Plan (2015) (Doc80) already provides the necessary Policy framework to achieve this through Local Development Plans.

TAYplan is not persuaded that the respondents have provided any compelling or robust evidence to justify the proposed increases in housing supply targets/housing land requirement that they are seeking. Neither the Scottish Government nor any other government agency has raised any issues regarding Policy 4A/Map 4 (Doc80).

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

<b>Reporter's conclusions:</b>
DPEA use only
<b>Reporter's recommendations:</b>
DPEA use only