

# ITEM No. 0 2

Report No 610/96

## ANGUS COUNCIL

PLANNING AND TRANSPORT POLICY COMMITTEE

29 AUGUST 1996

### SUBJECT: STRUCTURE PLANNING POLICY LAND FOR HOUSING

- (a) REVISED DRAFT NATIONAL PLANNING POLICY GUIDELINE NO. 3 -  
LAND FOR HOUSING
- (b) REVISED DRAFT PLANNING ADVICE NOTE NO. 38 - STRUCTURE PLANS  
HOUSING LAND REQUIREMENTS
- (c) IMPLICATIONS FOR TAYSIDE STRUCTURE PLAN 1993

REPORT BY DIRECTOR OF PLANNING, TRANSPORT & ECONOMIC DEVELOPMENT

**Abstract:** This report updates the Committee on the details of the proposed draft policy covering the allocation of land for housing in Structure Plans as published by the Scottish Office in draft revisions of National Planning Policy Guideline No. 3 and Planning Advice Note No. 38. The report also highlights the implications of this change in the housing land policy for the Tayside Structure Plan 1993, which is currently with the Secretary of State, and suggests a basis for the terms of a response by the Council.

## 1 RECOMMENDATION

1.1 It is recommended that the Committee:-

- I. note and accept the revised draft guidelines published as National Planning Policy Guideline No. 3 - "Land for Housing";
- II. note and accept the revised draft advice published as Planning Advice Note No. 38 - "Structure Plans: Housing Land Requirements";
- III. agree that this report provides the basis for a response to the Scottish Office Development Department on the contents of both the above documents;
- IV. agree that early approval of the Tayside Structure Plan 1993 is a priority and that strategic and local planning interests in Angus can best be served at this stage by the approval of the housing land allocation distribution as generally identified in Schedule 1 of the Plan in its submitted form to the Secretary of State subject to further consideration of the scope for and merits of refining the distribution taking account of more detailed up to date information emerging from current local planning work;
- V. authorise the Director of Planning, Transport and Economic Development to undertake initial consultation with Dundee City and Perth and Kinross Councils on the options for the Tayside Structure Plan 1993 and broad course of action as indicated in (iv) above and detailed in this report; and

- VI. request the Director of Planning, Transport and Economic Development to prepare a further report on (iv) and (v) above for consideration by the Committee before the Council makes a formal submission to the Secretary of State.

## **2 INTRODUCTION**

- 2.1 Although it was intimated to the Planning and Transport Policy Committee at the meeting on 6 June 1996 (report No. 464/96 refers) that the Secretary of State had announced a new policy with respect to the allocation of land for housing in Structure Plans, no details of that policy were publicly available at that time.
- 2.2 The Committee were also made aware that any new policy was likely to have implications for the final approval of the Tayside Structure Plan (1993) currently with the Secretary of State and for aspects of future Structure and Local Plan work in Angus.
- 2.3 The Scottish Office have now intimated details of the new policy and published consultation draft versions of the undernoted documents with a request for comments by 17 September 1996:-
1. National Planning Policy Guideline (NPPG) 3 - Land for Housing; and
  2. Planning Advice Note (PAN) 38 - Structure Plans: Housing Land Requirements.

A copy of the draft NPPG and PAN is available for reference at the Members' Lounge, The Cross, Forfar. A copy of a letter dated 17 July 1996 from the Scottish Office Development Department is appended to this report (Appendix 1).

- 2.4 In addition opportunity has also been afforded to relevant authorities in the light of the proposed policy changes to reconsider the terms of the Structure Plan submitted to the Secretary of State and where appropriate make submissions on the housing land allocations and whether these should be altered.
- 2.5 The NPPG and PAN documents when finalised will provide important guidance for future Structure and Local Plan preparation. The key shorter term issue to be addressed is the potential implications for the Tayside Structure Plan 1993 and particularly the land allocations associated with the towns and landward areas of Angus to be further detailed in the Angus Local Plan.
- 2.6 This report therefore comprises two parts, firstly a review of the principal changes arising from the draft version of NPPG3 and PAN 38 and secondly a discussion on the implications, and options for the Tayside Structure Plan 1993.

## **3 PRINCIPLE CHANGES TO REVISED DRAFT NPPG3 - HOUSING LAND**

- 3.1 The revised draft NPPG sets out planning policy on land for new housing and establishes the general principles, national and local considerations to be taken in to account in both preparing Development Plans and assessing planning applications.

Particular attention is focused on such aspects as housing development within existing settlements, infill development, extensions to existing settlements, new settlements, housing in the countryside, affordable housing, open space, energy requirements and the response required by authorities in preparing Structure and Local Plans.

- 3.2 When finalised and republished the NPPG will replace the existing guidance published by the Scottish Office in July 1993. The principal change is the proposal to allow authorities greater flexibility in determining how and where to provide additional land for housing by giving a greater weight to the importance of local considerations when balancing those with national policy and other matters. This therefore enables authorities to take account of environmental, social and economic factors in dealing with or assessing the requirements for housing land.
- 3.3 It is suggested that authorities are best placed to reconcile the various elements of the housing demand/supply equation and ensure that Structure and Local Plans reflect a balanced community view. It must however be stressed that this is not a free for all by local authorities and where it is proposed that variations are made to the housing land calculations between one housing market area and another or between one town and another, then reasoned arguments require to be made fully in support of any changes away from the housing land assessments. This is a significant change to previous approaches and in broad terms this change is welcomed however it is the implications of this policy change for the existing Tayside Structure Plan which is particularly important at the present time and this is picked up in subsequent sections of this report.
- 3.4 While a five year land supply is still required by the draft NPPG, the effective supply requirement has been amended to emphasise that it can be tailored to local circumstances. Also introduced is the concept that land can be taken account where it is made capable of becoming effective during the Plan period. This is a more realistic approach to the question of land supply and is more flexible than the previous NPPG. It recognises for instance that not all housing land can be made available from year one and that the issue of drainage improvements, etc. can vary over any five year period and that land can become available during that time. At present any site which would not be drainable immediately would not be considered as part of the effective housing land supply.
- 3.5 The draft NPPG stresses the need to maintain and improve the environment with factors such as character and setting of towns and villages, scale and density of new developments important aspects in the consideration of housing sites. The draft establishes a sequential approach to site selection indicating a preference for the re-use of brownfield sites (vacant and derelict land) as a first choice, followed by infill development, then extension to existing settlements and finally, where required and justified, the establishment of new settlements.
- 3.6 With regard to the policy for new housing in the countryside there is little change to the previous policy although it is recognised that individual houses in the countryside can contribute to general support for rural areas. Authorities are required to establish

clear guidance for development in the countryside and particular attention is focused on the location and design for new housing in rural areas.

- 3.7 It should be noted in terms of the guidance for housing in the countryside that the practice adopted by the Finalised Tayside Structure Plan 1993 and the Angus District Rural Areas Local Plan is in keeping with the draft NPPG.
- 3.8 The draft NPPG, also includes guidance on affordable housing, housing for special needs, design and environmental quality, open space and energy conservation. While the principals on these aspects remain unchanged, there are minor adjustments to wording.
- 3.9 With regard to action required of development plans, the section relating to Structure Plans has been amended to reflect the main changes indicated by the NPPG. Local Plans remain unaffected.

#### SUMMARY

- 3.10 In broad terms the draft NPPG should be welcomed in that it reinforces the primacy of the Development Plan System, providing positive guidance in the area of land for housing, as a basis for future Structure and Local Plan policy. It also continues the move towards a sustainable approach to development with an emphasis on quality in both the built and natural environments.
- 3.11 Throughout the draft NPPG additional discretion has been given to Local Authorities to make and justify the decisions and strategy with regard to housing land. However, the Secretary of State retains the final role in the approval of housing land strategy in Structure Plans. The basis upon which the Secretary of State will intercede in determination of the strategy is touched on but will only become clearer as final decisions on Structure Plans emerge.

#### **4 REVISIONS TO PAN 38 STRUCTURE PLANS: HOUSING LAND REQUIREMENTS**

- 4.1 While the draft PAN has been amended to reflect the principal changes arising from the draft NPPG, the purpose remains to provide advice on good practice in the assessment, monitoring and implementation of housing land requirements in the preparation of Structure Plans. The principles established by the NPPG as outlined in the previous sections are integrated into the Planning Advice Note.
- 4.2 This is a particularly important but complex Advice Note which will provide the basis for future Structure and Local Plan work. The Planning Advice Note therefore requires to be read in conjunction with the NPPG.
- 4.3 There is general recognition that a range of other bodies in addition to private house builders should participate in assisting the Structure Plan Authorities assess housing land requirements. This involvement would be at the preparation stage and also in association with the annual audit of the effective land supply. While a variety of interests and organisations can be invited to contribute to the consideration of housing land requirements it remains the duty of the Authority to prepare Structure Plan policies taking into account relevant factors.

- 4.4 Structure Plans set forward the strategy for a period of 10-15 years, and the effective land requirement continues to be based on a rolling five year supply. Monitoring land supply continues through the use of an annual audit and this will assist in monitoring the build rate which will be one element in a regular review of strategy.
- 4.5 The assessment of housing land requirements is dealt with in more detail, identifying a range of factors which require to be taken into account such as demographic needs, demand, housing market areas and other factors.
- 4.6 In the use of demographic forecasts there is a recognition that a range of projections can be used rather than a single estimate reflecting more localised situations. Where particular estimates are to be used then justification must be put forward as part of the Structure Plan.
- 4.7 The draft PAN introduces a fundamental change where it is no longer suggested that supply and demand are to be balanced in each separate housing market area. Mobile demand can therefore be taken into account among housing market areas dependent on the strategic policy adopted and land requirement.
- 4.8 The draft NPPG3 emphasises the need for Authorities to balance housing demand with a range of other factors before determining the appropriate level of housing to be provided for in the Structure Plan. These other factors are outlined in the draft PAN and reinforce the viewpoint that it is for the Authority to take account of environmental, social and economic factors in determining the strategic housing land requirement.
- 4.9 Annex 1 of the draft PAN deals with the land supply audit and definitions of established and effective land supply. The use of annual audits is recommended as they will assist in the monitoring process and promote continuity in the understanding of the supply situation. Opportunity is also open to authorities to consider the role of small sites i.e. up to four houses, in the audit process.
- 4.10 One of the fundamental changes in the draft PAN is the definition of effective land supply which has been amended to include all sites which are capable of becoming effective during the five year period. Housing land does not require to be effective from day one but can be made available during the five year period. The PAN establishes the various criteria for effective land including ownership, physical, contamination, deficit funding, marketability, programming, infrastructure and land use. The various weighting given to each of the factors will vary according to local circumstances and is discretionary to the Planning Authority.
- 4.11 With regard to ownership, previously, land had to be in the ownership of housebuilders to become effective, however this has now been eased to include land in other ownership who can reasonably be expected to develop or release the land for development during the five year period.

#### SUMMARY

- 4.12 There are some fundamental changes to the approach to determining housing land supply and requirement as indicated by the revised draft PAN38. The process appears to be more systematic however given the detailed assessment of particular

factors e.g. infrastructure, community and education facilities, built heritage etc. as included in para 21 of PAN38, there does seem to be a blurring of the relationship between Structure and Local Plan functions. The level of detail needed in consideration of strategic land supply is more in line with Local Plan site assessment. It does suggest a 'bottom up approach' to this element of strategic planning.

- 4.13 The opportunity to take into account sites of up to four houses in the audit process recognises, particularly in rural areas, the contribution that individual and small schemes can make collectively to the overall housing supply through the construction of one, two or three units.
- 4.14 In addition to the methodological changes and the various related factors, the key change is the definition of the effective housing land supply which allows the inclusion of land which "is expected to be free of constraints in the five year period under consideration, and will therefore be available for construction of houses".
- 4.15 In addition the criteria for assessing effectiveness has generally been eased to include "within the five year period under consideration". This introduces more flexibility into the process.
- 4.16 In general terms the revisions provide more flexibility to the Structure Plan Authority and in many ways are a more realistic presentation of the housing situation. The changes are therefore to be welcomed however as with the draft NPPG, it is the practical application of these changes in both the terms of final approval of the Tayside Structure Plan 1993 and future Structure and Local Plan work which is the important factor.

## 5 TAYSIDE STRUCTURE PLAN 1993 - IMPLICATIONS AND OPTIONS

### BACKGROUND

- 5.1 The previous two sections of the report have dealt with the draft changes to the national housing land policy which enables more flexibility by authorities in the allocation of housing land in Structure Plans. This section of the report deals with the practical application of the draft changes and in particular to the decision by the Secretary of State that the structure plan authorities have the opportunity to reconsider the terms of the submitted Tayside Structure Plan 1993 before a final decision is given on that plan.
- 5.2 Concerns had previously been expressed by former local authorities in many parts of Scotland including former Tayside authorities on aspects of national guidance for matching land supply with likely requirement. The most controversial issues have generally arisen when the Secretary of State has modified structure plan housing land allocation policies at a settlement level, significantly changing the strategies developed by the structure plan authorities. This has happened with the Tayside Structure Plan where the draft modifications to the finalised Tayside Structure Plan 1993 issued by the Secretary of State in August 1995 included significant proposed changes to the scale and location of future housing land allocations including the relationship between future housing land release in Dundee and Carnoustie, Forfar

- and Kirriemuir. Appendix 2 to this report summarises the changes proposed by the Secretary of State.
- 5.3 The draft modifications proposed to the Tayside Structure Plan by the Secretary of State, resulted in an increased allocation of 700 houses in the Arbroath/Carnoustie and Forfar/Kirriemuir planning areas to the year 2006. The additional 700 houses is effectively the reallocation of the calculated mobile demand which the finalised Structure Plan had diverted to the Dundee area from Carnoustie, Forfar and Kirriemuir.
- 5.4 These 700 houses are additional to the existing effective land supply and allocations identified in the Finalised Structure Plan for the Arbroath/Carnoustie and Forfar/Kirriemuir planning areas which totalled 2,610 houses. This is a fairly fundamental shift in the allocation of housing land and if approved in that form would require additional land to be allocated via the local plan process.
- 5.5 The former Tayside Regional Council objected to a number of the draft modifications to the housing land policies for Tayside and Angus in particular noting concerns both in detail and in the overall effect on the development strategy. The Regional Council were concerned that the changes proposed were too constrained by a continuation of past trends and fail to provide sufficient discretion for Forward Planning to respond positively to needs and opportunities arising through the formulation and implementation of an appropriate development strategy. In addition there were concerns about the substantial increase to the allocations for Carnoustie, Forfar and Kirriemuir and the corresponding reduction for those in Dundee. These were contrary to the development strategy of the plan which sought to achieve a changing focus for development over the plan period relating new housing development more closely to the main centres of employment taking account of the capacity of both road and drainage systems. Particular concern was raised for Kirriemuir where the proposed increase in the allocations would mean a completion rate of 52 per annum compared with 20 per annum which has been more typical in the last ten years. This substantially increased rate of growth would be excessive compared with available land, employment opportunities and place local services under unnecessary pressure, contrary to the development strategy of the plan. Accordingly therefore the Regional Council objected to the modifications associated with the Forfar/Kirriemuir area and also that for Carnoustie.
- 5.6 The former Angus District Council also objected to the scale of modifications, in particular the extent of the modified housing land allocation for Kirriemuir. The former District Council considered that given the relative lack of local employment in Kirriemuir, this additional allocation will result in greatly increased commuting to Forfar and more likely the larger employment centre of Dundee. It appeared to the District Council that this was in direct conflict with strategy No. 4 of the Structure Plan which sought to ensure that the amount and rate of development in the Strathmore area "does not encourage long distance commuting to the main employment centres". In addition it was felt that an additional growth rate would detrimentally affect the character of Kirriemuir by promoting further modern peripheral housing development. It was the District Council's contention that the additional 200 houses allocated to Kirriemuir by the Secretary of State should be spread among the larger settlements of Carnoustie, Arbroath and Forfar.

### ANGUS COUNCIL PERSPECTIVE

- 5.7 Commenting on the Secretary of State's proposed modifications to the Tayside Structure Plan, Angus Council initially made the following observations:-
- the proposed housing land modifications are likely to put further pressure on the A92 between Arbroath and Dundee; and
  - the need for investment in the infrastructure in Angus to support additional development and improve the environment is reinforced by the proposed modifications.
- 5.8 The Secretary of State has now given Angus Council the opportunity to further consider the housing land allocations proposed in the submitted Tayside Structure Plan in the light of draft revised national guidance before he comes to a final decision on the plan.
- 5.9 Three broad options are therefore now suggested for consideration by Angus Council:-
- a) endorse the former Tayside Regional Council and Angus District Council objections to the draft housing modifications and press for the approval of the Tayside Structure Plan 1993 in the form originally submitted to the Secretary of State;
  - b) accept the Secretary of State's draft housing land modifications to the Tayside Structure Plan in whole or in part;
  - c) advocate major changes to the housing development strategy, e.g. a switch of emphasis away from the western edge of Dundee to the Monifieth/Carnoustie corridor, in the period 2001 - 2006.
- 5.10 The Scottish Office letter of 17 July, outlining the changes to the structure planning policy for housing, indicates that, before submitting comments, the authority would no doubt wish to consult appropriately with other interests. This may include house builders, adjoining local authorities, other public interests as well as the general public.
- 5.11 The extent of any additional consultation will clearly depend to some extent on which of the options are pursued. Were the Council to support the Structure Plan as previously submitted, then there would likely be minimal consultation required since there has been extensive previous public consultation associated with the submitted version of the Structure Plan. Similarly the draft modifications previously proposed by the Secretary of State have already been the subject of consultation with interested parties. However were the Council to advocate a major shift in the housing land strategy, then a considerable amount of consultation would be required.
- 5.12 There are a number of implications both for the form of guidance provided in the Structure Plan and the likely timescale for approval arising from the three options outlined above and the following paragraphs now deal with these matters.



- 5.13 Press for Approval of Tayside Structure Plan 1993 as Submitted: The housing land strategy is divided into two time periods, 1993-2001 and 2001-2006. The latter period was indicated in the structure plan as being subject to review. The strategy sought to allow for both local need and an element of mobile demand in each of the planning areas while maintaining the major land allocations in and around Dundee. Appendix 2 illustrates the level of housing land allocation for the main Angus towns. Around Dundee, including the Monifieth and Sidlaw areas which are now within Angus, the structure plan housing, policy 7 indicated that "development will be mainly located in the western sector of the city in conjunction with the removal of infrastructure constraints in order to extend locational and sectoral choice and improve the supply and quality of housing opportunities. More limited land release will be acceptable in the north-west sector together with a maximum of 250 houses as additional greenfield allocations in the north-eastern and eastern sectors.
- 5.14 This latter element of housing policy 7 was the subject of proposed modifications by the Secretary of State which deleted the maximum figure of 250 houses on the east side of the city.
- 5.15 One of the main reasons the submitted structure plan strategy sought to restrict the level of housing in the east/north-eastern sector related to infrastructure constraints particularly the A92 road network congestion during peak periods.
- 5.16 The option of endorsing the guidance provided for the initial period as set out in the submitted plan (1993 - 2001) would have the benefit of allowing the document to be considered for approval at a relatively early date and also facilitate progress on local planning work. The 2001-2006 period will be subject of review within the next few years in any event and will enable Angus Council to consider and formulate a longer term housing strategy, building on the work being undertaken as part of the Angus Local Plan. In effect it would provide an initial framework for the authority to progress the local plan, the work associated with the A92 upgrade and consider the implications for housing land strategy in future plan documents.
- 5.17 Acceptance of Secretary of State's Modifications in Whole or in Part: The modifications which deal directly with the scale and distribution of housing land allocations by settlement and planning areas related to the Arbroath/Carnoustie area, Forfar/Kirriemuir area and the Dundee area. The additional land allocations required by the modifications are principally for Carnoustie, Forfar and Kirriemuir. The former authorities - Tayside Region and Angus District both objected to the scale of future housing particularly in Kirriemuir. These are also current drainage constraints associated with both Forfar and Carnoustie which will limit the scale of development possible in these areas in at least the short term.
- 5.18 Nonetheless the Council could accept some of the modifications proposed by the Secretary of State where an element of additional flexibility is provided. In particular the proposed modification to housing policy 7 deleting a specified maximum number of houses east of Dundee as discussed in paragraph 5.14 above would allow further consideration of the longer term strategy in this area while providing an element of control and guidance in the shorter term. Certain other proposed modifications to the detailed wording of the Structure Plan housing chapter policies and text are also acceptable, as previously identified by the former Tayside

Regional Council, where these do not compromise the calculation of forecast housing demand and schedule of housing land allocations by planning area identified in the submitted Structure Plan.

- 5.19 Promotion of Major Strategy Changes: As part of the formulation of its longer term strategy Angus Council will, in due course, wish to review development priorities from its own perspective. However a major shift in policy terms at this stage would require a substantial level of both technical work and public consultation in order to assess the full implications and whether any changes would have public endorsement. Such an exercise would be time consuming and would inevitably delay further any approval of the Tayside Structure Plan 1993 and would divert resources away from local plan preparation. In any event the opportunity exists through the preparation of the Angus Local Plan to test various options such as an A92 development corridor and to assess the public reaction to this. Work associated with the Angus Local Plan will therefore also be of use in a subsequent structure plan review which will be required within the next two to three years. This will give the Council the opportunity to fully evaluate various options.

#### SUMMARY

- 5.20 The housing land allocations associated with the Tayside Structure Plan 1993 fall into two periods 1993-2001 and 2001-2006. The latter period is subject to review. The proposed guidance on strategic housing land issued by the Scottish Office supports the structure plan as submitted which takes account of forecasts, land supply, ability of towns to absorb additional housing, taking into account infrastructure, road capacity etc.
- 5.21 On this basis and recognising the merits of an early approval of the Structure Plan, it is suggested that the most appropriate course of action would be to request the Secretary of State to approve the Tayside Structure Plan 1993 generally as submitted. In particular those parts of the submitted plan dealing directly with forecast housing demand and the distribution of housing land allocations by planning area remain broadly appropriate subject to further consideration of the scope for and merits of refining the distribution taking account of more detailed up to date information emerging from current local planning work (Table 3.3, Schedule 1, of submitted plan). This would provide a firm base for local plan work while recognising that the strategy for 2001-2006 will be subject to review. This would enable Angus Council to further consider the period subsequent to 2001 in due course taking account of work undertaken and consultations on the Angus Local Plan, the outcome of the A92 roads bid and other relevant considerations as part of the future review of the Structure Plan.

## **6 FINANCIAL IMPLICATIONS**

- 6.1 There are no financial implications arising from this report.

## **7 CONSULTATIONS**

- 7.1 The Chief Executive, Director of Law and Administration and Director of Finance have been consulted in the preparation of this report.

## 8 CONCLUSION

- 8.1 This report considers the recently published draft revisions to NPPG 3 and PAN 38 dealing with housing land, and provides a basis for a response to the Secretary of State on the terms of the future approval of the Tayside Structure Plan 1993.
- 8.2 The draft NPPG and PAN are generally welcomed as a more flexible approach to the consideration of strategic housing land requirement issues. The role of Local Authorities appears to have been strengthened, although the Secretary of State retains the power of intervention as part of the Structure Plan modification and approval process.
- 8.3 The Finalised Tayside Structure Plan 1993, is at present with the Secretary of State. Opportunity has been afforded to Angus Council to make submissions on the housing land strategy in the light of the new draft guidance published by the Scottish Office before a final decision on the Structure Plan is made by the Secretary of State.
- 8.4 The draft advice contained in the NPPG and PAN when finalised, together with submissions from the local authorities and other interests, will provide a framework for the terms of approval of the Structure Plan by the Secretary of State in due course.
- 8.5 This report concludes that strategic and local planning interests in Angus would be best served by the early approval of the Tayside Structure Plan 1993. It also suggests that subject to further detailed consideration, this can most appropriately be achieved, in line with the new draft guidance issued from the Scottish Office, by the approval of the housing land allocation distribution as generally identified in Schedule 1 of the Structure Plan submitted to the Secretary of State. This recognises that the longer term allocations in the 2001 to 2006 period are subject to review and also provides for the incorporation of some modifications to other aspects of the housing policies and text of the Structure Plan as previously proposed by the Secretary of State.
- 8.6 It would be preferable to make a co-ordinated submission on the terms of approval of the Tayside Structure Plan 1993 and consultation with Dundee City and Perth and Kinross Councils will therefore be required before a final response is given to the Secretary of State.

## NOTE

No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973, (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above Report.

AA/GDP/KW/IAL  
20 August 1996

Alex Anderson  
Director of Planning, Transport & Economic Development





17 July 1996

Dear Consultee

STRUCTURE PLANNING POLICY: LAND FOR HOUSING

The Secretary of State for Scotland announced in a Written Answer to a Parliamentary Question, a new policy covering the allocation of land for housing in structure plans. In the announcement, Ministers undertook to publish fresh guidance which would set out the new policy in more detail and highlight factors authorities should take into account in taking decisions about the allocation of housing land in their structure plans.

As a consequence of the policy announcement, it is necessary to adjust National Planning Policy Guideline (NPPG) 3: Land for Housing and the related Planning Advice Note (PAN) 38: Structure Plans Housing Land Requirements. Revised drafts are enclosed and changes to the original text are underlined. Comments are sought on the detailed changes now proposed by 17 September. These should be submitted to:

Mr Alan Denham  
Scottish Office Development Department  
Planning Services Division  
Room 2-H73  
Victoria Quay  
EDINBURGH  
EH6 6QQ

As usual, the Department will assume that responses to consultation may be made available to the public on request and displayed in The Scottish Office Library. If, however, respondents indicate that they wish all or part of their reply excluded from these arrangements, confidentiality will of course be respected, although their response may be included in any numerical summary of responses received.

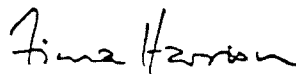
Because of the nature of this policy change, the Secretary of State, before reaching a final decision on the structure plans before him, is giving relevant authorities and others the opportunity to reconsider the terms of the plans submitted to him in the light of the guidance and, if they think it appropriate, to make submissions to him.. Before submitting comments, authorities will wish to consult appropriately with other interests.

While it is recognised that this may delay final decisions on the structure plans, it is only proper that authorities have a reasonable opportunity to reconsider their position in the light of finalised guidance. Of course, where authorities are able to give an early indication they are content with the submitted structure plans covering their area, there is no reason why these should not proceed to a shorter timetable.

More generally, other authorities may wish to consider whether to come forward with any alterations to the housing land content of the existing approved structure plans, as they judge appropriate.

If you have any queries concerning the general aspects of the new policy, please contact Fiona Harrison (0131-244-7710). Queries about the application of the new policy to the structure plans before the Secretary of State should be directed to Ian Firth (0131-244-7077), Jack Gillespie (0131-244-7079) or Mike Scott (Strathclyde only) (0131-244-7078).

Yours sincerely



*for* M T AFFOLTER

## APPENDIX 2

**Finalised Tayside Structure Plan 1993**  
**Schedule 1 - Housing Land Allocations by Planning Area 1993 - 2006 (on Sites of 5 Units or More)**

	Effective Land Supply at June 1993	Additional Allocation		Total Allowance 1993 - 2006
		1993 - 2001	2001 - 2006 (Subject to Review)	
Montrose	50	210	180	440
Brechin	70	150	130	350
Montrose/Brechin Landward	10	100	80	190
Montrose/Brechin Planning Area	130	460	390	980
Arbroath	430	130	280	840
Carnoustie	70	70 (170)	120 (320)	260 (560)
Arbroath/Carnoustie Landward	60	50 (100)	100	210 (260)
Arbroath/Carnoustie Planning Area	560	250 (400)	500 (700)	1310 (1660)
Forfar	190	100 (200)	250 (300)	540 (690)
Kirriemuir	220	100 (200)	150 (250)	470 (670)
Forfar/Kirriemuir Landward	80	100	110	290
Forfar/Kirriemuir Planning Area	490	300 (500)	510 (660)	1300 (1650)
Dundee District Greenfield Sites	530	1040 (890)	1280 (1130)	2850 (2550)
Dundee District Brownfield Sites	1490	No limit (assume 2500) (2300)	No limit (assume 2700) (2500)	No Limit (assume 5690) (6290)

Note: Figures in Brackets ( ) are DRAFT modifications proposed by Secretary of State

