Scotia Homes Ltd: Dubton (Site B1), Brechin

Submissions on Proposed Angus Local Development Plan

Emac Planning LLP, Ballinard House, 3 Davidson Street, Broughty Ferry, Dundee DD5 3AS
First name *(Required)*:
Emelda

Surname *(Required)*:
Maclean

Organisation *(if relevant) *(Required)*:
Scotia Homes Ltd c/o Emac Planning LLP

Address line 1 *(Required)*:
Ballinard House

Address line 2 *(Required)*:
3 Davidson Street

Town / city *(Required)*:
Broughty Ferry

Postcode *(Required)*:
DD5 3AS

Email *(Required)*:
Emelda@emacplanning.co.uk

Telephone *(Required)*:
01382 738822
Representations and Suggested Modification to the Proposed Angus Local Development Plan

The following submissions by Emac Planning LLP on behalf of Scotia Homes Ltd are made in support of the allocation of Site B1: Dubton in the Angus Local Development Plan. Dalhousie Estate is a willing partner in supporting the land allocation.

Subject: Strategy Part 1 – A Presumption in Favour of Sustainable Development

Page / policy reference: 6

The approach of the ADLP to enshrine a presumption in favour of sustainable development reflects national planning policy and is supported, together with the commitment to support proposals which will improve the economic, social and environmental conditions in the area.

Subject: Strategy Part 2 – Directing the Right Development to the Right Place

Page / policy reference: 7

The strategy for guiding the majority of development to the principal settlements identified including Arbroath, Forfar, Montrose, Brechin, Carnoustie and Kirriemuir is supported and is in accordance with Policy 1: Location Priorities of the TAYplan, approved 2012. The approach is also consistent with the emerging Proposed TAYplan, 2015.

The strategy also seeks to “maintain and protect the diversity and quality of the rural area and encourage local development which supports the population and services of local communities; and provide opportunities for appropriate diversification of the rural economy.” This is supported, however it is considered that the Proposed ALDP fails to secure this in practice for a number of local communities and villages. The Proposed ALDP fails to facilitate even a modest scale of growth in a number of locations where such development would support local services and community life. Site-specific representations are made on the ADLP in this respect.

Subject: Strategy Part 2 – Directing the Right Development to the Right Place (The Towns)

Page / policy reference: 8

The Proposed ALDP approach to directing most new development to the larger towns of Arbroath, Forfar and Montrose is supported, together with the towns of
Brechin, Carnoustie and Kirriemuir on a scale commensurate with their role as smaller centres of population and economic activity.

It is considered however, that the phasing of new development in these towns is also critical to the effective delivery of housing, together with a generous supply and further comments are made on the Proposed ALDP in relating to these issues.

**Subject: Strategy Part 3 – Creating High Quality Places**

**Page / policy reference: Policy DS1 Development Boundaries and Priorities - page 10**

Supported.


Supported.

**Page / policy reference: Policy DS3 Design Quality and Placemaking – page 13**

Supported.

**Page / policy reference: Policy DS4 Amenity – page 14**

Supported.

**Page / policy reference: Policy DS5 Developer Contributions – page 15**

It is considered that Policy DS3 should make specific reference for the need for contributions to comply with advice contained in Circular 3/2012: Planning Obligations and Good Neighbour Agreements in order to provide further clarity on future requirements. This is without prejudice to commenting further on the referred to proposed statutory supplementary guidance on developer contributions, which should ideally be available for consultation alongside the consultation on the Proposed ALDP.

**Policy Framework Part 1 – Thriving and Connected Part 1**

**Subject: Policy TC1 Housing land Supply/Release**

**Page / policy reference: 19**

**Housing Land Requirement: General**
In general the Policy is supported, together with maintaining a 7-year supply of effective housing land, however, it is considered that the Housing Land Requirement (HLR) should be increased and the following comments are made:

The HLR should be increased by 10-20% to reflect Government Policy as contained in paragraph 116 of SPP, which states:

“Within the overall housing supply target plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.”

Table 1 of the Proposed ALDP identifies the Housing Land Supply (HLS) for the period 2016-2026. The text in blue illustrates the impact of a 10% to 20% increase on the HLR when a 10-20% allowance is applied.

**Table 1: Housing Land Supply 2016-2026 (10% - 20% Flexibility)**

<table>
<thead>
<tr>
<th>HMA</th>
<th>Tayplan SDP HLR 2012-26</th>
<th>Actual &amp; programmed completions 2012-2026</th>
<th>Remaining Requirement 2016-26 (a-b)</th>
<th>Programmed Completions 2016-2026</th>
<th>LDP Allocations 2016-2026</th>
<th>Total Plan Provision 2016-2026 (d+e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Angus</td>
<td>4420 1232-1344</td>
<td>208</td>
<td>912 1024-1136</td>
<td>60</td>
<td>930</td>
<td>990</td>
</tr>
<tr>
<td>East Angus</td>
<td>4420 1232-1344</td>
<td>286</td>
<td>834 946-1058</td>
<td>491</td>
<td>430</td>
<td>921</td>
</tr>
<tr>
<td>South Angus</td>
<td>4420 1232-1344</td>
<td>113</td>
<td>1007 1119-1231</td>
<td>277</td>
<td>780</td>
<td>1057</td>
</tr>
<tr>
<td>West Angus</td>
<td>1260 1386-1512</td>
<td>274</td>
<td>986 1112-1238</td>
<td>417</td>
<td>760</td>
<td>1177</td>
</tr>
<tr>
<td>ANGUS TOTAL</td>
<td>4620 5082-5544</td>
<td>881</td>
<td>3739 4201-4663</td>
<td>1245</td>
<td>2900</td>
<td>4145</td>
</tr>
</tbody>
</table>

By adding on the SPP required flexibility to Table 1 of the Proposed ALDP, the ‘Remaining Requirement 2016-2026’, for the whole of Angus, would be in the region of 4,201 to 4,663 units, compared to 3,739. The equates to a requirement for 462 to 924 additional units. The increase in the HLR identifies that there is a shortfall in the ‘Total Plan Provision 2016-2026’ of 56-518 residential units. In terms of each Housing Market Area (HMA) this equates to a deficit in North Angus of 34-146 units, a deficit in East Angus of 25-137 units, a deficit in South Angus of 62-174 units and in West Angus there would be an oversupply of 65 units at 10% and a deficit of 61 units at 20%.
20% flexibility is supported in accordance with SPP having regard to potential delivery issues associated with some LDP Allocations and Programmed Completions, which are addressed under site-specific representations. In effect, there is some concern over the deliverability of some of the sites identified in the effective supply and a sufficiently generous HLR will assist in achieving the housing land supply.

Separate submissions have also been made suggesting that the Proposed ALDP should also provide for planned housing growth in some of the villages where this would support service provision and sustain communities.

It is considered that a more generous housing requirement would facilitate such growth and ensure compliance with Scottish Government Policy contained in paragraph 119 of SPP which states:

“Local development plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met.”

The principle of allowing sites to come forward where necessary to maintain a 7-year effective housing land supply is supported, including the early release of sites/houses planned for later phases of the plan. Whilst this scenario could result in a diminishing HLS as the LDP advances, it is considered that a more generous HLR as advocated above would mitigate against this.

Finally, it is also considered that Table 1 should clearly identify the 5-year HLR & HLS and the 7-year target HLR & HLS as required by the TAYplan and national planning policy.

**Suggested Change (Table 1: Housing Land Supply 2016-2026 page 20):**

Suggested change as follows:

A 20% generosity allowance should be applied to the Housing Land Requirement in accordance with the upper range required by Scottish Government Policy and to assist in alleviating concerns over the delivery of a 7-year effective housing land supply, in the periods identified.

**Subject: Policy PV11 Energy Efficiency - Low and Zero Carbon Buildings**

**Page / policy reference: 60**

The submission of a Sustainability Statement with specified developments is supported.
Whilst developments should strive to achieve the low carbon targets proposed by the Scottish Government, the LDP policies should be balanced against achieving viable developments in this economic climate. The ability of developments to reach zero carbon generating technologies may place a financial burden on developments and the imposition of overly stringent standards could threaten the viability of development.

In addition, many of the zero carbon technologies are untested over the lifetime of a building and also place a maintenance burden upon the owner. We would support a balanced approach to energy efficiency policy which places equal weight on a ‘fabric first’ approach which is demonstrated to place minimal maintenance burden upon owners and can prove more effective due to it removing the reliance on occupants to understand and manage complex system controls which zero carbon techniques rely upon.

Alternative legislation is available to ensure a reduction in CO2 emissions in developments and therefore the Policy in the LDP should be of a general nature only encouraging such developments, with specific targets being the responsibility of other legislation and policy documents.

**Suggested Change (Policy PV11 Energy Efficiency - Low and Zero Carbon Buildings):**

Suggested change as follows:

Delete first two paragraphs.

**Settlement Statement: Brechin**

The following submissions by Emac Planning LLP on behalf of Scotia Homes Ltd are made in support of the allocation of Site B1: Dubton in the Angus Local Development Plan. Dalhousie Estate is a willing partner in supporting the land allocation.

Policy B1: Housing – Dubton Farm of the Proposed LDP confirms that the site is allocated for residential development of around 400 dwellings. Scotia Homes Ltd supports the allocation and the proposed phasing in Policy B1 of 125 dwellings in 2016-2021 and 125 dwellings in 2021-2026. Policy B1 confirms that scale of further land release in the period beyond 2026 will be determined by a future Local Plan and this is also supported.

The site is currently identified for residential development in the Angus Local Plan Review, adopted 2009 and has therefore already been previously assessed as appropriate for housing development development. The continuation of this statutory allocation into the new ADLP is therefore endorsed. In effect, Site B1 was considered to be suitable for new development in 2009 and there has been
no substantial change in the social, economic or environmental factors since which would affect the allocation.

Scotia Homes Ltd is committed to the delivery of new housing and mixed-use development at Dubton on site B1. This has been demonstrated through the submission of two planning applications to Angus Council for the development on the northern part of Site B1.

Planning Application Ref: 09/00675/FUL for the erection of mixed use development comprising 99 residential units and 120sqm of retail/commercial units at Dubton Farm was submitted in June 2009 and granted, subject to a S75 Planning Agreement. The Section 75 and consent were subsequently issued in November 2014.

In November 2014, Scotia Homes Ltd submitted a Proposal of Application Notice on the same application site, for residential development. The planning application will be submitted shortly. The reason for the new application is that Scotia Homes wish to provide for an amended layout and for new house types which reflect their current aspirations, including improved sustainability standards, and local market requirements.

The new planning application facilitates the implementation of a first phase of residential development at Dubton Farm in accordance with Policy B1 and its phasing requirements. The proposed planning application and the previously approved application demonstrate that the site is capable of delivering effective housing land in the first period of the Proposed ALDP.

Scotia Homes Ltd supports the allocation of the whole site for 400 houses and the identification of a second phase of development for 125 houses in the period 2021-2026. The longer term vision for Dubton Farm identified in the Proposed ALDP provides the necessary confidence for Scotia Homes to invest further in delivering the remaining phases of site B1, as a natural extension to the submitted planning application for the first phase at this site, in accordance with the Development Brief for the site.

Scotia Homes Ltd would also be in a position to bring forward phases of residential development on this site, in the event of an identified HLS shortfall, should this be considered appropriate. Further comments on the HLR and the contribution of Dubton Farm to the HLS are provided below.

Scotia Homes supports the Council’s reasons for continuing to allocate Site B1 in the ALDP as expressed at the Main Issues stage in the plan preparation. In summary, Angus Council considered that Site B1 should be designated as it is viable for development, there is a committed national housebuilder and the location for growth is consistent with the TAYplan strategy to prioritise land releases in principal settlements. It is further relevant that the Council has also concluded that if Site B1 was unviable other development sites would need to be found outwith the development boundary, which is less preferred. In addition,
there is a limited capacity of brownfield sites within Brechin, with the potential for these sites to remain undeveloped in the current economic climate. Having regard to the local context, Scotia Homes support Angus Council’s analysis leading to the allocation of site B1.

In summary, Scotia Homes Ltd is committed to the delivery of new housing at Dubton Farm in accordance with Policy B1 of the Proposed ALDP and this is demonstrated by the approved planning application and the imminent submission of a revised layout for the site, together with amended house types. It is considered that the new proposal will directly meet market requirements and deliver much needed housing in the North Angus HMA.

It is clear from the Housing land Audit (HLA), 2014, that the delivery of housing land at Dubton is critical to meeting the TAYplan HLR. Within the North Angus Housing Market Area, TAYplan establishes an 80 unit per annum requirement. Policy 5: Housing of the TAYplan requires a 5 year housing land supply at all times, that is, 400 units (80 units x 5 years) and for LDPs to work towards a 7 year requirement, that is, 560 units (80 units x 7 years).

The HLA, 2014 identifies a 5 year HLS of only 240 units and this falls short of the effective 5 year HLR of 400 units, by 160 houses. There is, however, a 7-year supply of 753 units and this target can be met at this stage. 320 units out of the 513 units identified in the period post 2021 in the HLA are programmed to be delivered from the Dubton Farm allocation in the ALPR. The 2014 Audit currently identifies 80 houses at Dubton in the period 2016-2021.

Submissions will be made on the 2015 Audit to bring forward a further 45 houses at Dubton into the effective supply for 2016-2021 (based on the 125 unit allocation in the Proposed ALDP) and this will assist in augmenting the supply in the first 5 years of the LDP.

However, the deficit in the supply would also grow in the event of applying a 10%-20% generosity allowance as required by SPP to the HLR. In the North Angus HMA this would equate to a further deficit of 34-146 units.

Given the undersupply in the first 5 years and the over-supply in terms of the 7 year target, brought about by the allocations of Dubton post 2021, that is 320 unit in the ALPR or 275 units in the Proposed LDP, Scotia would also be content to bring forward additional housing land at Dubton into the period 2016-2021, enabling the 5 year supply to be met without compromising the 7 year target. In effect 115 units could be brought forward from the post 2021 allocation, which together with the increase in 45 units programmed for phase 1 at Dubton would make up current 160 unit deficit.
Suggested Change:

It is suggested that 115 units (or thereabouts) could be brought forward from the 2021-2026 allocation at Dubton Farm to the period 2016-2021 if required to meet a shortfall in the HLS in this period in the North HMA.