Angus Local Development Plan: Proposed Plan

Policy Submissions on behalf of A&J Stephen and Avant Homes
Representations and Suggested Modifications to the Proposed Angus Local Development Plan

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

Page / policy reference: 6

The stated approach of the ALDP to enshrine a presumption in favour of sustainable development reflects national planning policy and is supported, together with the commitment to support proposals that 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 stated strategy for guiding the majority of development to the principal settlements would be in accordance with Policy 1: Location Priorities of the TAYplan, approved 2012 if it was properly reflected in the Proposed Plan. This approach would also be consistent with the emerging Proposed TAYplan, 2015.

However, in not considering the allocation of greenfield land outwith the development boundaries for Birkhill / Muirhead the Plan does not conform with TAYplan and we object to this omission.

Figure 1 Development Strategy, page 7, should be amended to reflect the status of Birkhill within TAYplan Policy 1.

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

Page / policy reference: 8

Again, we object to the approach to not allocating greenfield land outwith the development boundaries for Birkhill / Muirhead within the Dundee Core Area.
Policy 5: Housing, part C of the TAYplan, 2012 states that LDPs shall "ensure there is a presumption against land releases in areas surrounding the Dundee and Perth Core Areas, including the Carse of Gowrie, where it would prejudice the delivery of Strategic Development Areas or regeneration within the core areas or conflict with other parts of this Plan."

Contrary to various statements within the Proposed Plan, Policy 5C does not specifically refer to the Western Gateway and does not preclude new land releases where the delivery of an SDA would not be prejudiced. With the immediate delivery of the Western Gateway it is considered that the ALDP can provide for some further new housing within the Core Area, specifically at Birkhill, without prejudice to the TAYplan strategy and provide for the effective delivery of housing land in a location close to City services and infrastructure.

**Suggested Change (Last Paragraph under ‘The Towns’ page 8):**

Suggested change highlighted in bold or scored, as follows:

TAYplan SDP requires new housing developments in and around Dundee not to prejudice the Western Gateway development within the city (which has been identified as a Strategic Development Area). In order to avoid conflicts with TAYplan SDP and the Dundee Local Development Plan which focuses new development primarily on brownfield sites and on a limited number of greenfield sites within the city, the remainder of land in Angus which is part of the Dundee Core Area will not be considered for significant new development or greenfield release during the ALDP period. The ALDP does not therefore seek to allocate greenfield land outwith the development boundaries for Birkhill / Muirhead or in other locations outside the principal settlements but within the Dundee Core Area.

**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 DS5 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**

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>a</th>
<th>b</th>
<th>c</th>
<th>d</th>
<th>e</th>
<th>f</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Angus</td>
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<td>1232-1344</td>
<td>208</td>
<td>912</td>
<td>1024-1136</td>
<td>60</td>
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<tr>
<td>East Angus</td>
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<td>1232-1344</td>
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<td>946-1058</td>
<td>491</td>
</tr>
<tr>
<td>South Angus</td>
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<td>1232-1344</td>
<td>113</td>
<td>1007</td>
<td>1119-1231</td>
<td>277</td>
</tr>
<tr>
<td>West Angus</td>
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<td>1386-1512</td>
<td>274</td>
<td>986</td>
<td>1112-1238</td>
<td>417</td>
</tr>
<tr>
<td><strong>ANGUS TOTAL</strong></td>
<td><strong>4620</strong></td>
<td><strong>5082-5544</strong></td>
<td><strong>881</strong></td>
<td><strong>3739</strong></td>
<td><strong>4201-4663</strong></td>
<td><strong>1245</strong></td>
</tr>
</tbody>
</table>

By adding 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.

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.

**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**
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.

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 to reflect the above.