

PLANNING APPLICATION REF. 18/00778/PPPM

**DESCRIPTION OF DEVELOPMENT:
RESIDENTIAL DEVELOPMENT INCORPORATING FORMATION OF
ACCESS ROADS, LANDSCAPING, ASSOCIATED INFRASTRUCTURE
AND CEMETERY EXTENSION**

AT

FIELD 525M SOUTH EAST OF PITSKELLY FARM PITSKELLY CARNOUSTIE

REPRESENTATIONS

Your ref:
Our ref: ATW/MAM
DD: 01738 494108
E: andrew.wood@bidwells.co.uk
Date: 30/11/2018

Angus Council
Planning and Transport Department
Orchardbank Business Park
Forfar
Angus
DD8 1AX

Dear Sirs

UPPER VICTORIA HOUSING DEVELOPMENT – PITSKELLY FARM: K & D HENDERSON (LANDOWNER), D J LAING HOMES LIMITED (PROMOTER) VOIGT ARCHITECT (ON BEHALF OF PROMOTER) AND PERSIMMON HOMES

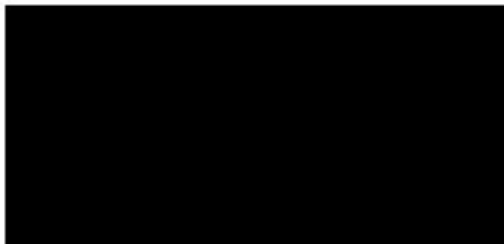
I refer to the recent submitted planning application (18/00777/ppm) to the south of our C1 and C7 approved allocated sites.

The statement in this application refers to our site as ineffective and we would now confirm we have an agreement in place that will allow for the delivery of the new business and industrial area to C1 and C7, Upper Victoria. There is an agreement in place with D J Laing Homes to bring forward an initial phase of 10 acres early next year to allow for the delivery of this and free and relocate the industrial business within Carnoustie.

With regards to residential development land, I believe you are aware we have an arrangement with Persimmon Homes and a detailed plan has now been prepared in relation to submission of an application early in 2019. It is envisaged this should result, subject to relevant approval, in construction commencing in Quarter 3, or early Quarter 4, in 2019. This area extends to 24.28 acres.

I trust this clarifies your enquiry and if you would like to have answers to any other questions I would be pleased to assist with these.

Yours faithfully



Andrew Wood
Partner, Rural

29 November 2018

Angus Council
Planning & Transport
Orchardbank Business Park
Forfar
DD8 1AX

Dear Sirs,

**PLANNING APPLICATION NO. 18/00777/PPM
REDIDENTIAL DEVELOPMENT INCORPORATING FORMATION OF ACCESS ROAD,
LANDSCAPING, ASSOCIATED INFRASTRUCTURE AND CEMETERY EXTENSION
FIELD 525M SOUTH EAST OF PITSKELLY FARM, PITSKELLY. CARNOUSTIE**

With reference to the above planning application and supporting documentation the following statement is submitted on behalf of D J Laing Homes Ltd and K & D Henderson (farmers and landowners of Pitskelly Farm) the primary parties behind the development proposals associated with Local Development Plan allocations C1 Housing - Land at Pitskelly and C7 Working - Land at Pitskelly. The statement is intended to clarify the current position with regard to both developments and to refute the assertions set out in the Planning Statement and Housing Land Supply Appraisal which accompanies planning application 18/ 00777/PPM with regard to effectiveness.

In short, the general proposition by the applicants is that firstly the Local Plan allocated sites C1 and C7 are not effective and secondly as a result there is a shortfall of land for housing in the South Angus Housing HMA in order to meet the requirements of TAYplan 2016 -2036. Assertion of the above is the primary justification behind the current proposal.

Dealing firstly the effectiveness of land allocations C1 Housing and C7 Working the following update should be noted:

- Sites C1 and C7 are allocated for development by the adopted Angus Local Development Plan;
- Planning permission in principle for the developments has been granted subject to conditions and a section 75 agreement;
- A range of discussions have taken place and are ongoing with various Angus Council departments and work is underway to purify the various planning conditions in order to timeously bring forward a high-quality development to meet the vision of the Council, community and my clients;
- An agreement is in place between the landowner, DJ Laing Homes Ltd and a major national builder to deliver the first phase of some 250 houses in line with the local plan allocation. Several discussions have taken place with the planning authority on layout, design, housing mix etc;
- D J Laing Homes is acquiring 4 ha of the employment land (local plan proposal C7 Working). This will allow finalisation of development layout and enable marketing of employment land to be undertaken. It will also allow progress on the future of the Panmure industrial estate;

- Discussion is also ongoing with major infrastructure providers and Scottish Water has requested a refresh of previous drainage impact assessments (DIA's) to cover off the drainage options and requirements for Carnoustie west end that will incorporate development proposals for Pitskelly (allocated sites), Westfield (opportunity site C2), Barry Road (opportunity site C3) and Panmure industrial estate (opportunity site C5). This will build on three previous DIA's and provide the framework to release all of the above sites;
- Various other consultancy studies have been or are in progress of being commissioned;
- Given the above it is expected that development of the housing development will commence by late 2019 /early 2020.

My clients therefore strongly refute any suggestion that the development sites (C1 and C7) particularly the housing land allocation site C1 is anything other than effective; it continues to meet the prescribed tests for effectiveness as set out by Scottish Planning Policy a view shared by the Councils own development planning officials in their initial assessment of the current application and set out in email dated 7 November 2018.

Turning now to the assertion that there is a shortfall of housing land to meet the requirements of TAYplan 2016 – 2036. Policy TC1 of the Angus Local Development Plan deals with housing land supply and release. This indicates that the Local Plan allocates land to meet the housing land requirements set out by TAYplan SDP for the period to 2026. Since the adoption of the Angus Local Development Plan the TAYplan Strategic Development Plan for 2016 – 2036 has been approved and requires a five-year effective supply is maintained. Any requirement for a seven-year effective supply has been deleted.

Angus Council's published Housing Land Audit 2018 confirms that for the South Angus Housing Market Area there is an existing effective land supply for housing. This is also affirmed for the detailed assessment relating to Carnoustie. In particular Local Plan allocated site C1 is included in the Housing Land Audit as effective and that in terms of programming, completion of 75 houses will take place during the period 2020/21 to 2022/23 with a further 175 houses coming forward in later years. My clients are determined to bring this forward timeously. It should also be stressed that the Councils own Forward Planning officers have confirmed that there is no housing land shortfall in their initial assessment of the application now before the Council. (Reference e-mail dated 7th November 2018 – see also above).

In short, the current position is clearly at significant odds with the view expressed through the applicant's Planning Statement and Housing Land Supply Appraisal. Given the above my clients again refute any suggestion that there is shortfall of effective housing land that would allow a positive consideration of the current planning application.

In conclusion therefore, I would point out that legislation requires that decisions on planning applications be made in accordance with the development plan unless material considerations indicate otherwise. The application site is out with but contiguous with the development boundary for Carnoustie as set out by the adopted LDP and is not allocated for development. Consequently, a large-scale housing development of this nature would not be consistent with Policy DS1 Development Boundaries and Priorities. There is no public interest, social, economic, environmental or operational considerations that would confirm the need to approve such a site over sites both within the boundary and fully supported by the adopted Local Plan. Consequently, the site is contrary to both the delivery of the Council's development strategy and Policy DS1 as it would not focus new development on allocated sites.

Local Plan Policy TC1 deals with housing land supply and release. It is clear from the above and in particular from the comments by the Council's own Forward Planning staff that there is no shortfall of housing land supply in Carnoustie and South Angus. Local Plan Site C1 Housing – land at Pitskelly is confirmed to be effective and will significantly

contribute to meeting the housing requirements established and set out in TAYplan 2016 – 2036. Consequently, there is no justification to release any additional new sites.

Given the above I would ask for the Council's continued support for the Local Plan allocations at Pitskelly and reject the current planning application which is so evidently contrary to Council's vision, strategy and adopted planning policy for Carnoustie and Angus.



JOHN CULLEN
for Voigt Architects Limited