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By Email to: jayne.anderson@gov.scot

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Your Ref.: LDP-180-2

Dear Ms Anderson

Proposed Dundee Local Development Plan 2
The Town and Country Planning (Development Planning) (Scotland) Regulations 2008
Further Information Request 02: Issue 03 (Housing Strategy) and Issue 04 (Supply of Land for Housing)

We note your letter to Dundee City Council (DCC) of 26 April 2018 regarding Further Information Request 02 (FIR02) and the Council's response dated 17 May 2018. We have reviewed the Council's response and discussed this with Homes for Scotland (HFS) members.

On a general level, it may be that HFS and DCC are not significantly far apart. However, it is HFS's position that a Local Development Plan (LDP) must provide clear guidance to delivery partners on what is required to be achieved and be derived from a robust evidence base. This submission therefore explores the necessary amendments to the numerical basis for this plan without which the Plan may fail to meet the expectations of national policy or statutory obligations set through legislation.

Housing Land Requirement

HFS notes what DCC has stated on this matter, and this is reflected in the commentary below. Nevertheless, it is unclear to HFS what point DCC is attempting to make in their comments in the second paragraph of their response on this matter. For the avoidance of any doubt, it is HFS's position that in preparing a LDP within a city region, Scottish Planning Policy (SPP) (CD 1) clearly sets out the national policy expectation at paragraph 119 that such plans:

"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."

In this case, proposed LDP2 must meet the Housing Land Requirement (HLR) set out within TAYplan strategic development plan (SDP) (CD4). In so doing, it is relevant to note the wording of SPP paragraph 119. Irrespective of what was deemed acceptable previously, paragraph 119 clearly states that an emerging LDP must meet the strategic HLR. This then means allocating land for at least 6,336 new homes to be delivered (or capable of being delivered) between 2016 and 2028. It must also be noted that the predecessor of TAYplan was brought forward under the predecessor of SPP.

In allocating any land, the critical obligation is that this land is in the process of being delivered, or there is evidence to give comfort that it can be delivered within the timescales required; this is reflected on further below and later in this response.

The views of the home building industry are relevant to test the assumptions made by a local authority and the Housing Land Audit (HLA) process is a highly valuable approach to then be able to achieve this. That approach makes it possible to measure the land that can and will come forward. The delivery of this land is a partnership between a local authority and home builders. It would therefore be a highly disingenuous position to adopt that a local authority will simply allocate land and devolve the responsibility of delivery to home builders and one that we do not believe that DCC actually believes (despite the comment offered by the Council in the fourth paragraph of their response on this matter).

It may therefore be relevant to seek clarification from DCC as to what they mean by the statement;

"With a realistic supply of effective land on which to build and no constraints to delivery, the onus here in Dundee is on housebuilders to meet the housing supply target and for the Council to actively monitor completions and maintain a 5-year effective land supply as per Policy 9 of the Proposed LDP2."

This appears to set aside the fact that there are constraints to the supply of new homes within Dundee (within the Established Land Supply) including constraints on the pace of land coming forward for acquisition and ultimate development as well as market conditions that all impact on how many homes can then be delivered in any year; much of which is within the gift of DCC to address through how and where they release land for development.

In terms of defining an appropriate HLR figure for proposed LDP2, given that the proposed plan period will run beyond the core SDP plan period, on the basis that DCC will adopt LDP2 in 2019, they are nevertheless still required to define a HLR to 2029 and continue to ensure compliance with SPP paragraph 119. In so doing they must also ensure they can comply with Section 16(6) of the Town and Country Planning (Scotland) Act 1997 (as amended) (The Planning Act) (CD33).

The matter of LDP start date (2018 or 2019) was raised by the Reporters in the context of the "take-up" matter but perhaps need some consideration at this stage. HFS understood the reasoning for adopting an LDP plan period to 2029 was to allow for a 10 year plan period starting in 2019 (as stated by paragraph 6.5 of proposed LDP2). It is therefore a confused position presented within the DCC response as to whether they are in fact planning for an 11 year plan period (2018 to 2029) or 10 years (2019 to 2029). HFS has proceeded on the basis that plan Adoption would take place in 2019 and therefore the 10 year plan period would run from then until 2029. DCC could perhaps be asked to clarify what plan period they are in fact planning for.

In their considerations of the City of Edinburgh LDP in 2016 (see <u>LDP-230-2</u>), the Reporters addressed a similar issue to that faced by DCC in terms of the LDP plan period extending beyond a stated SDP plan period. City of Edinburgh Council, through their proposed LDP, promoted a simple pro-rata extension of the approved strategic target between 2019 and 2024 out a further 2 years to 2026. The Reporters endorsed that approach in their conclusions on Issue 5 of that LDP Examination.TAYplan however, through Policy 4, presents a longer term timescale (20 years to 2038) that continues the same assumed annual average delivery rate for Dundee beyond 2028 as is stated for the period to 2028.

It is HFS's position that there must be a HLR identified for at least 10 years after the expected Adoption of the LDP to ensure consistency with SPP and the pro-rata approach presented by City of Edinburgh Council and endorsed by the Reporters dealing with the LDP Examination in 2016 (and in line with TAYplan Policy 4) has also been applied to Dundee's proposed LDP2 situation. As such, HFS is content that an annualised average HLR of 528 homes is used as the basis for defining the minimum scale of allocations that are to be brought forward through this LDP to the stated end of the plan period of 2029.

However, for clarity, HFS's position is that it is the strategic HST that proposed LDP2 must ensure it can and will deliver sufficient land to meet that target. The basis for this assertion is the statement of paragraph 115 of SPP which states:

"The housing supply target of a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan and local housing strategy, taking into account wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements such as the aims of National Parks."

In allocating land, the emerging LDP must therefore consider whether the strategic targets have been met from the base date of the Strategic Development Plan (SDP). In this case, the LDP must take into consideration progress towards satisfaction of the strategic targets since 2016 and thereby ensure that the strategic targets will be met by the end of the plan period; no other LDP considers whether the strategic HST since 2016 has been delivered since the extant LDP for Dundee is based on the preceding SDP (which in turn was based on the preceding SPP).

Such an approach is also consistent with the position presented through the most recent City of Edinburgh LDP and also subsequently endorsed by those LDP Examination Reporters as well as being an approach endorsed by the Reporters dealing with the recent Stirling LDP Examination (<u>LDP-390-2</u>).

To that end, HFS is of the view that DCC's proposed LDP2 must set out how the annualised average of 480 homes per annum HST will be met between 2016 and 2029, a total HST of 6,240 homes (i.e. 13 years at an annualised average of 480 homes). To this a 10% Generosity Margin must be applied and subsequently, as is guided by SPP paragraph 119, the HLR that is to be met by proposed LDP2 would be enough land that is capable of delivering 6,864 homes between 2016 and 2029 with whatever has not been delivered by the time the LDP has been Adopted then requiring to be delivered by the end of the plan period.

An updated land supply calculation is provided as Annex 1 to this submission and draws together the position presented in here as well as updating the calculation set out in HFS's submission on DCC's proposed LDP2 from October 2017.

Take-up 2016-2018

HFS notes what DCC has stated on this matter, and this is reflected in the commentary below.

HFS would question why an assumption was used in the first instance given HLAs provide a view (often agreed) on the potential land supply. "Take-up" is an arbitrary figure with no evidential basis and perhaps simply unsubstantiated guesswork of the land supply that may come forward. That figure is also less than what is expected to arise from information set out in the latest HLA.

The 2016 HLA (CD10) indicated that between 2016 and 2018 there would be 903 new homes delivered across the City. However, despite the DCC response to FIR02 it is still unclear to HFS why expected "take-up" to 2018 only was considered within the Housing Background Paper (CD08) when it should have considered "take-up" to 2019 with the adopted plan period then running for the 10 years from then to 2029. The 2016 HLA indicated a predicted output from the Established Land Supply to 2019 of 1,659 homes (303 new homes in 2016/17).

However, DCC has now finalised the 2017 HLA (CD11) following dialogue with HFS. Whilst there are a number of sites disputed within the 2017 HLA (see Annex 2), that nevertheless provides a view on potential supply to 2024. The known supply in 2016/17 was 416 new homes and the expected output from the Established Land Supply between 2017 and 2019 is now 960 new homes.

The variance between the predicted supply between 2016 and 2019 based on the 2016 HLA and that known / predicted within the 2017 HLA is then 283 fewer homes (this discrepancy arising through changes in programming of sites between the HLAS and sites being agreed as constrained in the 2017 HLA following dialogue with HFS). Across the disputed sites within the 2017 HLA, some 75 completions are predicted between 2017 and 2019; it is HFS's view that some of these may still come forward but only in later years.

The assumption that DCC has then suggested is that only 924 new homes may be delivered between 2016 and 2019 when their 2017 HLA has stated that some 1,376 new homes have been or will be delivered during this period. Even if the disputed sites are discounted from this figure, the variance between DCC's assumption and the published evidence would still be 377 more homes. Albeit DCC then expects these to still come forward later in the plan period it may question the validity of the programming set out in the 2017 HLA and implies that the final programming is perhaps too optimistic, including on sites where HFS has not disputed the Council's suggested programming.

Windfall sites

HFS notes what DCC has stated and HFS would not disagree with the predicted supply of windfall and small sites across the plan period which has been assessed as an average of 72 windfall homes per annum and a further 20 new homes pa from small sites. HFS would state that the windfall and small sites assumption cannot be applied to any years where completions have been noted but, based on DCC's proposed approach, it would be reasonable to assume that during 2017/18 and 2018/19, a windfall and small sites contribution may be made in addition to the supply of new homes from the Established Land Supply.

This would then amount to 184 additional homes that may come forward in advance of the LDP2 being Adopted in 2019 plus a further 920 such completions that may come forward between 2019 and 2029.

HFS's view the overall numerical position is therefore, that proposed LDP2 must ensure that, as a minimum, land that is capable of delivering 5,304 new homes between 2019 and 2029 is identified within proposed LDP2.

This remaining strategic HLR could be met from the Established Land Supply and the 2017 HLA predicts this could now deliver 2,889¹ new homes to 2024 plus a further 681 then still available to be delivered between 2024 and 2029 from the unconstrained Established Land Supply² as well as the constrained supply. As also noted above, this supply could also be met in part through a contribution from windfall and small sites during that 10-year period (i.e. 920 new homes).

However, based on those figures, there would remain an under-supply of land for 814 new homes capable of being delivered by 2029 over and above that identified within the 2017 HLA that requires to be addressed within proposed LDP2. That under-supply may be addressed by new allocations coming through proposed LDP2 as well as new planning permissions on other sites and that is addressed below.

HFS has disputed a number of sites that would equate to land for 513 new homes from the effective Established Land Supply (75 homes between 2017 and 2019 and 438 homes between 2019 and 2029). These sites may still come forward during the LDP2 plan period to 2029 and for the purposes of the LDP land supply calculations, HFS has assumed these sites will still come forward and be developed by 2029 although later in the plan period than suggested by the 2017 HLA.

LDP Allocations

HFS notes what DCC has stated throughout their response in that the additional allocations that amount to land for 930 additional units will meet any assessment of under-supply (be that DCC's assessments of land for 334 homes, 934 homes or 824 homes or HFS's updated assessment of land for 814 homes). However, the reality is perhaps more nuanced than this basic assumption.

Whilst unfortunate that the proposed LDP2 uses different site numbering to either the existing LDP or any HLA, in seeking to bring clarity of the situation (and in particular to understand which proposed LDP2 sites already form part of the Established Land Supply, which are additions to that supply and how much of the supply is not shown as an allocation within the Plan) HFS has prepared a schedule that combines information contained within Appendix 3 of proposed LDP2 and the 2017 HLA (Annex 3). This is then also reflected in HFS's conclusions on additional supply from new allocations set out below.

Land east of Strathyre Avenue (H47)

HFS notes what DCC has stated and HFS agree that this site is classified as greenfield.

¹ The 2017 HLA mis-calculates the potential total supply between 2019 and 2024 and has omitted 6 new homes that will arise during that period from the annual totals.

² Note the 2017 HLA does not include the 49 units left to be built on the Whitfield Later Phases site beyond 2024 (2017 HLA site reference 200739 and proposed LDP2 sites H29 and H33).

Land at Western Gateway, Liff (H42)

HFS notes what DCC has stated and HFS understands that proposed LDP2 site H42 is a new allocation being brought forward at this time in addition to the current allocations in this location. Proposed LDP2 site H42 lies between 2017 HLA sites 200409 and 200738.

Additional land proposed for housing within the LDP

HFS notes what DCC has stated. Nevertheless, the information set out in our Annex 3 indicates that some 12 sites are not currently included within the 2017 HLA (shaded yellow in Annex 3) and as such these can be deemed new allocations within proposed LDP2. The new allocations include proposed LDP2 site H16 which is an extension of the existing 2017 HLA site 201107. They also include 7 former school sites across Dundee and 4 new greenfield sites; 3 of which are at the Dundee Western Gateway location and the fourth is on the north east edge of the City.

A further site (proposed LDP2 site H13 - Queen Victoria Works; shaded orange in Annex 3) has seen its capacity increased by 10 units within proposed LDP2 from that set out within the 2017 HLA and the Linlathen site (proposed LDP2 site H46, also shaded orange in Annex 3) has also seen its capacity increased by 100 units within proposed LDP2 from that set out in the 2017 HLA.

DCC's table includes the Linlathen site at Arbroath Road as a new allocation, HFS would consider this is not a new allocation given it already forms part of the Established Land Supply (albeit constrained). The Council's table also excludes the proposed LDP2 site H16.

The combined capacity of new allocations is therefore land for 860 new homes with 2 sites showing an increased capacity (over and above what is set out in the Established Land Supply) that amounts to land for a further 110 new homes. Therefore, whist DCC has suggested that proposed LDP2 is adding land for 930 new homes to the Established Land Supply, in HFS's assessment they are promoting additional land for 970 new homes.

• Effectiveness of LDP sites / delivery of enough new homes

HFS notes what DCC has stated, and this is reflected in the commentary below. As noted above and as is set out in Annex 3, <u>HFS understands that proposed LDP2 is promoting 12 new and 2 amended allocations that have a combined capacity of 970 homes.</u> This must be set in context with the HFS assessed undersupply of land for 814 new homes once the Established Land Supply is considered (as now defined by the 2017 HLA) or any of the 3 assumptions of under-supply now provided by DCC.

However, there is a lack of evidence at this time to clarify how many of the potential 970 new homes proposed LDP2 is promoting over and above the Established Land Supply are capable of coming forward for delivery by 2029 (hence actually meeting the HLR and thereby complying with SPP paragraph 16 and Section 16(6) of The Planning Act). There also remains a question as to whether 2017 HLA presents an over-optimistic view of output from the Established Land Supply given DCC's use of "take-up" rather than HLA programming.

HFS has not undertaken any detailed quantitative analysis of the new / amended allocations but, we have briefly considered the Western Gateway sites. There is a potential that the additional allocations at the Western Gateway (proposed LDP2 sites

H41, H42 and H43) which have a combined capacity of 430 new homes, may only come forward for development later in the plan period (i.e. around 2024) once the current sites in that location are nearing completion.

As these sites come forward in due course, there is also a potential that the current delivery rate of 70 new homes per annum in that location will be maintained; a position that seems to be accepted by DCC in their comment at paragraph 3 on page 2 of their response to FIR02: "Simply increasing the land supply would not increase the rate of delivery". Therefore, it is possible that only 24 new homes from the 3 proposed LDP2 allocations at this location would come forward in 2023/24 and then a further 210 new homes would come forward from these sites between 2024 and 2029 over and above the remainder of 2017 HLA site 200356.

Therefore, even if all of the other new allocations were capable of coming forward for development in full by 2029, these new allocations as a whole may only be capable of generating 774 new homes by the end of the plan period. However, given the known constraints on 2 of the sites (proposed LDP2 sites H44 and H46 which are also 2017 HLA constrained sites 201425 and 201424 respectively) that may not arise.

There is a risk that proposed LDP2 has not allocated sufficient land that is effective, or capable of becoming effective, to meet the strategic HLR and as such, Dundee's proposed LDP2 would not be consistent with the national planning policy position set out within SPP at paragraph 119 and proposed LDP2 could not meet the statutory test set by Section 16(6) of The Planning Act.

It may therefore be relevant for DCC to produce an extended programming of the Established Land Supply and new / amended proposed LDP2 sites to 2029, to which further comment can be offered by third parties, to more explicitly test the ability of proposed LDP2 to meet the strategic HLR. This should clarify how currently constrained sites can and will be delivered and can perhaps also identify which, if any, Established Land Supply sites are to be deleted.

Delivery of Affordable Homes

HFS notes what DCC has stated in their response to FIR02.

It is presently unclear from the 2017 HLA which sites are deemed affordable and which are market sites (which may then also deliver an element of affordable housing) despite the expectation clearly set out at paragraph 155 of SPP.

However, given the delivery rate achieved to date combined with the volume of land within the Established Land Supply and the new allocations where DCC is the landowner, it may be reasonable to assume that the 150 affordable homes per annum delivery rate can be achieved.

I trust the above is of assistance to the Reporters as they continue their consideration of DCC's proposed LDP2.

As noted in our introduction to this submission, while it appears that HFS and DCC are not significantly far apart on a number of general points, it is HFS's position that an LDP must provide clear guidance to delivery partners on the expectations that underpin the plan. Without the amendments to the numerical basis for this plan promoted by HFS response, that will be not be achieved.

I can also confirm that HFS will be available to attend a Hearing on Tuesday 24 July 2018 to explore these matters further if required.
Yours sincerely
Neil Martin Principal Planning Advisor
Enc.

Annex 1

Land Supply Calculations (May 2018)

a.	Strategic Housing Supply Target (2016 – 2029) based on an average of 480 pa (TAYplan 2017)	6,240
b.	Generosity Margin (10%) (TAYplan 2017)	624
c.	Housing Land Requirement (2016 – 2029) (= a. + b.)	6,864
d.	Actual Completions (2016/17) (2017 Housing Land Audit)	416
e.	Assumed completions from Effective Land Supply (2017-2019) (2017 Housing Land Audit)	960
f.	Assumed completions windfall sites (assume 72 pa) and small sites (assume 20 pa) (2017-2019)	184
g.	Equals Housing Land Requirement for LDP period (2019 – 2029) (= c. – d. – e. – f.)	5,304
h.	Completions expected from Effective Land Supply over the LDP 2 period (2019 – 24) (2017 Housing Land Audit)	2,889
i.	Completions expected from the remainder of Established Land Supply over the LDP2 period (2024 – 29) including constrained sites (2017 Housing Land Audit)	681
j.	Completions that may arise from windfall sites (assume 72 pa) and small sites (assume 20 pa) over LDP period (2019 – 2029)	920
	Under / Over supply against Housing Land Requirement (= h. + i. + j. – g.)	-814
k.	Disputed sites expected supply (2017 – 2019) (2017 Housing Land Audit)	75
l.	Disputed sites expected supply (2019 – 2029) (2017 Housing Land Audit)	438

Annex 2
Homes for Scotland Disputed sites within the 2017 Housing Land Audit

HLA SITE REF	CURRENT LDP REF	SITE NAME	OWNER / DEVELOPER
200115		Blackness Nursery	Signature Homes
200309	H04	Marketgait / South Tay Street	Brian Ower / Dundee City Council
200728	H19	Princes Street Ph2	Dundee City Council
200734	H21	224-232 Hilltown	Sydhar Properties (Dundee) Ltd
200821		Hawkhill Court, Mid Wynd	Lindores (Hawkhill) Ltd
200913	H31	Former Lawside Academy	Dundee City Council
201002		32-34 Mains Loan	James Keillor Estates
201004		Longhaugh Road	Tusker Developments
201205	H43	Land at Earn Crescent	Dundee City Council
201405		Land to Rear of Charleston Drive	Private
201408		114 Hilltown	Private
201412		36 Castle Street	Private
201508		The Old Mill, Brown Street	Crosslane Ltd
200727	H18	Princes Street Ph1	Dundee City Council
200730	H20	Maryfield Depot	Scottish Water
200808	H25	Angus Street	Dundee City Council
200813	H27	Loons Road	Private
201404		3 Albert Road Broughty Ferry	Private

Annex 3

Local Development Plan 2 Allocations and the Established Land Supply

		LDP2 Capacity	HLA Reference	2017 HLA Capacity	2017 HLA Supply 2017 - 2019	2017 HLA Supply 2019 - 2024	2017 HLA Supply 2024+	2017 HLA Supply 2019 - 2024+
H01	Former Charleston Primary School	40	201416	40	10	30	0	30
H02	Land at Earn Crescent	20	201205	20	0	20	0	20
H03	Land at Clatto	60	201413	60	0	60	0	60
H04	Quarry Gardens	18	200807	18	0	18	0	18
H05	Fomer Lochee Primary School	30	201417	30	0	30	0	30
H06	Lochee District Centre	40	201510	88	32	56	0	56
H07	Foggyley Gardens	40	200339	40	21	19	0	19
H08	Former Macalpine Primary School	25	200911	25	0	25	0	25
H09	Former Lawside Academy	70	200913	70	0	70	0	70
H10	Luaderdale Avenue	30	201414	33	0	33	0	33
H11	Former Downfield Primary School	25	200909	25	0	25	0	25
H12	Former St Columba's primary School	22	201415	22	0	22	0	22
H13	Queen Victoria Works	50	200321	40	0	40	0	40
H14	Railyards	110	199524	110	0	110	0	110
H15	Maxweltown Works	50	201421	50	0	50	0	50
H16	Maxweltown Multis	30	-	-	-	-	-	0
-	Maxweltown Multis	0	201107	81	81	0	0	0
H17	Central Waterfront	375	201109	375	40	290	45	335
H18	Princes Street	20	200728	20	5	15	0	15
-	Princes Street (ph 1)	-	200727	10	0	10	0	10
-	Barns of Claverhouse Road	-	201606	35	0	35	0	35
H19	Land at Barns of Claverhouse Road	12						
H20	Hebrides Drive West	10	201213	90	15	75	0	75
H21	Hebrides Drive North East	15	_					

LDP2 Reference	Site Name	LDP2 Capacity	HLA Reference	2017 HLA Capacity	2017 HLA Supply 2017 - 2019	2017 HLA Supply 2019 - 2024	2017 HLA Supply 2024+	2017 HLA Supply 2019 – 2024+
H22	Hebrides Drive South East	20						
-	Land to the north of Hebrides Drive	-	201710	14	0	14	0	14
H23	Former Mossgiel Primary School	30	201110	42	0	42	0	42
H24	Former Mid Craigie Primary School	37	200910	37	10	27	0	27
H25	Former Whitfield Shopping Centre	30	201012	46	0	36	10	46
H26	Lothian Crescent	15	200353	15	0	15	0	15
H27	Former Whitfield Primary School	25	201011	25	0	25	0	25
H28	Tranent Grove	70	201010	62	10	52	0	52
-	Site 4 Whitfield	-	199113	44	24	20	0	20
H29	Summerfield Gardens	80	- 200739	222	50	122	40	100
H33	Kellyfield, drumgeith Road	100	200739	232	50	133	49	182
H30	Haddington Avenue	35	201009	26	13	13	0	13
H31	Bowling Green East	30	201008	28	0	28	0	28
H32	Aberlady Crescent	75	200504	75	15	60	0	60
H34	Former Gowriehill Primary School	35	-	-	-	-	-	0
H35	Former Hillside Primary School	45	-	-	-	-	-	0
H36	Former St Mary's Infant School	10	-	-	-	-	-	0
H37	Former Baldragon Academy	70	-	-	-	-	-	0
H38	Former Our Lady's Primary School	35	-	-	-	-	-	0
H39	Former St Luke's & St Matthew's Primary School	30	-	-	-	-	-	0
H40	Former Longhaugh Primary School	25	-	-	-	-	-	0
H41	Dykes of Gray, North West	250	-	-	-	-	-	0
H42	Western Gateway, Liff	30	-	-	-	-	-	0
H43	Dykes of Gray, North East	150	-	-	-	-	-	0
H44	Baldragon Farm (constrained in 2017 HLA)	110	201425	110	0	0	110	110
H45	Land to East of Ballumbie Road	150	-	-	-	-	-	0

LDP2 Reference	Site Name	LDP2 Capacity	HLA Reference	2017 HLA Capacity	2017 HLA Supply 2017 - 2019	2017 HLA Supply 2019 - 2024	2017 HLA Supply 2024+	2017 HLA Supply 2019 – 2024+
H46	Linlathen, Arbroath Road (constrained in 2017 HLA)	250	201426	150	0	0	150	150
H47	Land to East of Strathyre Avenue	26	201424	26	0	26	0	26
-	Western Gateway, South Gray	-	200356	371	100	131	140	271
-	Western Gateway, Swallow	-	200408	165	50	115	0	115
-	Dundee Western, Liff Ph 1	-	200409	22	12	10	0	10
-	Dundee Western, Liff Ph 2	-	200738	100	20	80	0	80
-	Pitkerro Mill	-	201423	6	6	0	0	0
-	Blackness Nursery	-	200115	20	0	20	0	20
-	Marketgait / South Tay Street	-	200309	18	0	18	0	18
-	38-40 Seagate	-	200315	24	0	24	0	24
-	Taybank Works Phase 2	-	200329	28	8	20	0	20
-	Trottick Lowrise	-	200343	56	39	17	0	17
-	Monifieth Road	-	200347	26	15	11	0	11
-	Loons Road / Lawside Road	-	200348	12	6	6	0	6
-	Former Homebase Site	-	200611	158	80	78	0	78
-	Wallace Craigie Works	-	200723	100	0	80	20	100
-	Strathmore Avenue	-	200725	6	6	0	0	0
-	Mayfield Depot	-	200730	20	0	20	0	20
-	224-232 Hilltown	-	200734	10	0	10	0	10
-	Angus Street	-	200808	8	0	8	0	8
-	Loons Road	-	200813	16	0	16	0	16
-	Clement Park House	-	200817	14	9	5	0	5
-	Hawkhill Court	-	200821	101	0	101	0	101
-	Car Parks 3 - 7 & 9 - 11	-	200902	30	10	20	0	20
-	95 Seagate	-	200904	17	10	7	0	7
-	Tivoli 20 Bonnybank Road	-	200908	8	0	8	0	8
-	32-34 Mains Road	-	201002	131	20	111	0	111

LDP2 Reference	Site Name	LDP2 Capacity	HLA Reference	2017 HLA Capacity	2017 HLA Supply 2017 - 2019	2017 HLA Supply 2019 - 2024	2017 HLA Supply 2024+	2017 HLA Supply 2019 – 2024+
-	Longhaugh Road	-	201004	17	7	10	0	10
-	Gray's Lane	-	201101	12	12	0	0	0
-	Dura Street	-	201102	8	0	8	0	8
-	22 Castle Street	-	201103	12	12	0	0	0
-	Seagate / Trades Lane	-	201106	24	0	24	0	24
-	Derby Street Multis	-	201108	163	18	125	20	145
-	51 Magdalen Yard Road	-	201201	7	0	7	0	7
-	189-197 Pitkerro Road	-	201303	32	8	24	0	24
-	3 Albert Road BF	-	201404	6	3	3	0	3
-	Land to the rear of Chareston Drive	-	201405	16	5	11	0	11
-	55-57 Pitalpin Street	-	201406	5	5	0	0	0
-	114 Hilltown	-	201408	8	8	0	0	0
-	5-11 King Street	-	201411	12	12	0	0	0
-	36 Castle Street	-	201412	5	5	0	0	0
-	Former Blackwood Court	-	201419	6	6	0	0	0
-	Finavon Street	-	201422	56	56	0	0	0
-	42 Camphill Road	-	201502	7	7	0	0	0
-	164 Nethergate	-	201503	6	6	0	0	0
-	The Old Mill, Brown Street	-	201508	22	11	11	0	11
-	Land to the east of Linlathen House	-	201509	42	0	42	0	42
-	Winnock, 1 Gardyne Road	-	201601	7	7	0	0	0
-	4 North Isla Street	-	201604	8	8	0	0	0
-	26 Dock Street	-	201605	10	0	10	0	10
-	Constitution Road	-	201609	110	0	110	0	110
-	Lochee Old Church and Hall	-	201610	16	5	11	0	11
-	Land north of Molison Street	-	201701	2	2	0	0	0
-	44 Gray Street	-	201702	14	7	7	0	7
_	3-5 West Bell Street	-	201703	12	0	12	0	12

LDP2 Reference	Site Name	LDP2 Capacity	HLA Reference	2017 HLA Capacity	2017 HLA Supply 2017 - 2019	2017 HLA Supply 2019 - 2024	2017 HLA Supply 2024+	2017 HLA Supply 2019 - 2024+
-	70 Cotton Road	-	201704	5	5	0	0	0
-	Eliza Street	-	201706	40	20	20	0	20
-	124 Seagate	-	201707	8	8	0	0	0
-	Queen Street BF	-	201708	5	0	5	0	5
-	9 West Bell Street	-	201709	9	0	9	0	9
-	South Tay Street (constrained in 2017 HLA)	-	200308	15	0	0	15	15
-	Roseangle, Peterson House (constrained in 2017 HLA)	-	200316	10	0	0	10	10
-	Stewarts Land / Liff Road (constrained in 2017 HLA)	-	200806	40	0	0	40	40
-	Land at Charleston Drive (constrained in 2017 HLA)	-	201206	22	0	0	22	22
-	Stack Leisure Park (constrained in 2017 HLA)	-	201511	50	0	0	50	50
TOTALS		2,855		4,530	960	2,889	681	3,570