

**TAYplan Strategic Development Plan Authority**

**Summary of Unresolved Issues (Schedule 4)**

*Issue 13: Policy 4 Strategic Development Areas Alternative Sites*

## Contents

1. Summary of Unresolved Issues
2. Copy of actual representations pertinent to this issue  <i>(Confidential as it contains personal details which have not been redacted – for DPEA use only)</i> <ul style="list-style-type: none"><li>• All representations include any attachments submitted by the respondent</li><li>• Where representations were submitted in hard copy or by email these were entered into our system and all material originally submitted has been attached and appears here with the representation</li></ul>
3. Library of documents <ul style="list-style-type: none"><li>• All documents and extracts referred to in the representation and/or the Schedule 4 are either contained in the library attached to this Schedule or where over 50 pages within the Core Library (separate folders).</li></ul>

## 1. Summary of Unresolved Issues

Issue		
<b>13: Policy 4 Strategic Development Areas - Alternative Sites</b>		
<b>Development plan reference:</b>	Pages 14 & 15: Policy 4 and Supporting Text	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue &amp; Representation ref(s)</b>		
<b>Seeking a change</b>		
<b>ID Number</b>	<b>Person/Organisation</b>	<b>Representation Reference</b>
548889	Alaric Hopgood	PLAN827
548151	Andrew McCafferty Associates for GD Strawson & J Farquharson	PLAN443 & 453
545660	Colin McAllister	PLAN149
513279	D Graham Wynd	PLAN505
346407	DG Coutts for Linlathen Developments	PLAN285
548525	Dr Peter Symon	PLAN899
548522	Emac Planning for A&J Stephen Ltd./Bett Homes	PLAN734
445204	Emac Planning for Angus Estates Ltd.	PLAN650
548360	Emac Planning for M Batchelor	PLAN533 & 531
548524	Emac Planning for Stewart Milne Homes	PLAN778
542815	Flora Selwyn	PLAN79
547768	GM Gall	PLAN302
543112	GS Brown Construction	PLAN89
548389	Halliday Fraser Munro for Barratt Homes	PLAN586
546652	Howard Greenwell	PLAN257
547693	Irene Duncan	PLAN294
546532	Jim Farquharson	PLAN796
377831	Mrs Judith Harding	PLAN501
327210	JWK Properties	PLAN931
443893	Karen Clark Planning for Balmossie Developments Ltd & Messrs David Reid Farmers	PLAN529
544315	Miss Marianne Baird	PLAN293
548760	Mrs D Jeffrey	PLAN810
442290	Rosco Properties	PLAN163
548419	Roy de C Chapman	PLAN585
453889	Royal Burgh of St. Andrews Community Council	PLAN922
548386	Miss Sarah Hunt	PLAN545
444087	Scottish Property Federation	PLAN240 & 250
442871	Smiths Gore for Errol Park Estate	PLAN634 & 643
328791	St. Andrews Green Belt Forum	PLAN356
547750	St. Andrews Preservation Trust	PLAN304 & 843
539251	Stewart Milne Homes	PLAN316 & 326
547863	Wallace Planning Ltd. for National Grid	PLAN352

**Provision of the development plan to which the issue relates:**

The identification of strategic development areas and allocation of land uses for each site.

**Planning Authority's summary of the representation(s):**

## **SUMMARY OF REPRESENTATIONS SEEKING A CHANGE**

### **ALTERNATIVE STRATEGIC DEVELOPMENT AREA– GUARDBRIDGE**

**Alaric Hopgood (548889); Colin McAllister (545660); D Graham Wynd (513279); Flora Selwyn (542815); Howard Greenwell (546652); Irene Duncan (547693); Mrs Judith Harding (377831), Miss Marianne Baird (544315); Roy de C Chapman (548419); Miss Sarah Hunt (548386); St. Andrews Greenbelt Forum (328791) and St. Andrews Preservation Trust (547750):** All have expressed their opposition to the St. Andrews Strategic Development Area and have suggested an alternative site of the former paper mill at Guardbridge for a variety of reasons. **Alaric Hopgood (548889) and D Graham Wynd (513279)** considers that no consideration has been given to the former paper mill at Guardbridge as an alternative site. **Colin McAllister (545660), Flora Selwyn (542815), Howard Greenwell (546652), Irene Duncan (547693) and Miss Sarah Hunt (548386)** states that the former paper mill is a large brownfield site and is not a greenfield site within the St. Andrews green belt. **Judith Harding (377831), Miss Marianne Baird (544315), Roy de C Chapman (548419) St. Andrews Greenbelt Forum (328791) and St. Andrews Preservation Trust (547750)** consider that the proposed science park element of the St. Andrews Strategic Development Area should be built at the site of the former paper mill in Guardbridge.

### **ALTERNATIVE STRATEGIC DEVELOPMENT AREAS– CARSE OF GOWRIE**

**Andrew McCafferty Associates for GD Strawson & J Farquharson (548151); GS Brown Construction (543112); Jim Farquharson (546432) and Smiths Gore for Errol Park Estate (442871):** All promote alternative locations within the Carse of Gowrie to be considered as Strategic Development Areas. **Andrew McCafferty Associates for GD Strawson & J Farquharson (548151)** promotes the development of a new settlement at Horn grange because of the over concentration of site at Perth and Dundee. Proposal is for 3,500 dwelling and 35 hectares of employment land. **GS Brown Construction (543112)** consider that the Carse of Gowrie is a suitable location for significant development as flooding is not a significant problem to warrant its exclusion. **Jim Farquharson (546532)** considers that the Carse of Gowrie should be promoted as a development area and as an economic generator for Perth. He considers that there are no flooding issues unlike Perth. **Smiths Gore for Errol Park Estate (442871)** recommends that Table 1 on page 15 should include a 25ha site at Drums of Ardgait near Errol for employment uses including a service station. Because of its strategic location between Perth & Dundee on the A90 and also served by a nearby railway line the site should be considered suitable to be a strategic business location.

### **ALTERNATIVE STRATEGIC DEVELOPMENT AREAS – DUNDEE**

**DG Coutts for Linlathen Developments(346407); EMAC Planning for (A&J Stephen Ltd/Bett Homes (548522); Angus Estates Ltd (445204); M Batchelor (548360); Stewart Milne Homes (548524)); Halliday Fraser Munro for Barratt Homes (548389); Karen Clark Planning for Balmossie Developments Ltd & Messrs David Reid Farmers (443893); Scottish Property Federation (444087) and Stewart Milne Homes (539251):**All promote alternative locations or sites on the edge of or surrounding Dundee City to be considered as

Strategic Development Areas. **DG Coutts for Linlathen Developments (346407)** considers that all Strategic Development Areas need to be free from constraints and indicates that there are unconstrained sites at east and north Dundee and in the surrounding settlements. **Emac Planning for A&J Stephen Ltd/Bett Homes (548522)** suggests that there are effective sites at north west Dundee especially Birkhill as it is unlikely that the Dundee Western Gateway Strategic Development Area will come forward in the early part of the Plan. **Emac Planning for Angus Estates Ltd (445204)** promotes Carnoustie as an alternative location for large scale development. **Emac Planning for M Batchelor (548360)** Promotes greenfield sites at north and north east Dundee including at Ballumbie North in Angus as it has a clear association with Dundee, and is a proven market area. **Emac Planning for Stewart Milne Homes (539251)** promotes additional land release at north east Ballumbie/Duntrune as an alternative to the Western Gateway Strategic Development Area. **Halliday Fraser Munro for Barratt Homes (548389)** promote Monifieth North as a Strategic Development Area for mixed use including retail as it is in a highly sustainable location and can provide much needed housing land for Monifieth. There have been very few housing allocations in recent development plans yet the sites that have been allocated none have been developed. **Karen Clark Planning for Balmossie Developments Ltd & Messrs David Reid Farmers (443893)** questions the effectiveness of some sites allocated and the impact of non/delayed delivery will have on housing supply. Other allocations should be considered especially at east Dundee which is a sustainable location. **Scottish Property Federation (444087)** promotes further strategic sites in north and east Dundee as proposed sites such as Dundee Western Gateway and Oudenarde could remain constrained and therefore cannot guarantee any stimulus to economic growth. **Stewart Milne Homes (539251)** supports land release at eastern end of Dundee City as an alternative area for housing development.

#### **ALTERNATIVE STRATEGIC DEVELOPMENT SITE – OTHER SITES**

**Alaric Hopgood (548889); Dr Peter Symon (548525); GM Gall (547768); JWK Properties (327210); Mrs D Jefferey (548760); Rossco Properties (442290); Stewart Milne Homes (539251) and Wallace Planning Ltd for National Grid (547863):** All promote sites/locations within the TAYplan area to be considered as Strategic Development Areas. **Alaric Hopgood (548889)** promotes RAF Leuchars as an alternative site to St. Andrews Strategic Development Area. **Dr Peter Symon (548525)** recommends that the Oudenarde Strategic Development Area is replaced by a site in Kinross as it is in a more sustainable location that does not flood. **GM Gall (547768)** recommends Kinloch Rannoch as area where further development should be considered as it has a rail station and surrounding land is of lower production potential than that surrounding Dundee and St. Andrews. **JWK Properties (327210)** and **Mrs D Jefferey (548760)** both promote Craigend (near Methven) as a new village instead of some of the West/North West Perth Sites which are constrained and have funding issues. The site is considered sustainable and developer has pledged to fund all infrastructure requirements including a new school. If the site is discounted the opportunity will be lost by the Local Authority. **Rossco Properties (442290)** considers that an additional/alternative area for future employment development in Perth is land east of Friarton Bridge. **Stewart Milne Homes (539251)** consider that Auchterarder should be identified as a Strategic Development Area. **Wallace Planning Ltd for National Grid (547863)** Recommends that "Dundee Centre and Port Strategic Development Area" should include "Dock Street". The gas holder site is promoted as location for future retail development as is supported by the current Local Plan.

## **Modifications sought by those submitting representations:**

**NOTE TO REPORTER:** The text in italics in this section has been lifted directly from each individual/organisation's representation with minor typographical errors corrected.

### **ALTERNATIVE STRATEGIC DEVELOPMENT AREAS– GUARDBRIDGE**

*Alaric Hopgood (548889); Colin McAllister (545660); D Graham Wynd (513279); Flora Selwyn (542815); Howard Greenwell (546652); Irene Duncan (547693); Mrs Judith Harding (377831); Miss Marianne Baird (544315); Roy de C Chapman (548419); Miss Sarah Hunt (548386); St. Andrews Greenbelt Forum (328791) and St. Andrews Preservation Trust (547750)*: All request that the former paper mill at Guardbridge is considered as an alternative location to the St. Andrews Strategic Development Area and in particular as the location for the proposed Science Park element of the Strategic Development Area.

### **ALTERNATIVE STRATEGIC DEVELOPMENT AREAS– CARSE OF GOWRIE**

*Andrew McCafferty Associates for GD Strawson & J Farquharson (548151); GS Brown Construction (543112); Jim Farquharson (546432) and Smiths Gore for Errol Park Estate (442871)*: All request that the Carse of Gowrie area is considered for large scale strategic development and in particular at the following locations.

- *Andrew McCafferty Associates for GD Strawson & J Farquharson (548151)* promote Horn Grange, Errol for 3,500 homes and 35 hectares of employment land.
- *Smiths Gore for Errol Park Estate (442871)* promotes land at Drums of Ardgath (near Errol) for 25 hectares of employment land including a service station.

### **ALTERNATIVE STRATEGIC DEVELOPMENT AREAS – DUNDEE**

*DG Coutts for Linlathen Developments(346407); EMAC Planning for A&J Stephen Ltd/Bett Homes (548522); Emac Planning for (Angus Estates Ltd (445204); M Batchelor (548360);Stewart Milne Homes (548524)); Halliday Fraser Munro for Barratt Homes (548389); Karen Clark Planning for Balmossie Developments Ltd & Messrs David Reid Farmers (443893); Scottish Property Federation (444087) and Stewart Milne Homes (539251)*: All request that certain areas/locations surrounding or near to Dundee are considered to be alternative Strategic Development Areas for future large scale development.

### **ALTERNATIVE STRATEGIC DEVELOPMENT SITE – OTHER SITES**

*Alaric Hopgood (54889)* requests that RAF Leuchars is considered as an alternative site to St. Andrews Strategic Development Area.

*Dr Peter Symon (548525)* requests that the Oudenarde Strategic Development Area is replaced by a site in Kinross as it is in a more sustainable location that does not flood.

*GM Gall (547768)* requests that Kinloch Rannoch is considered as an alternative Strategic Development Area to Dundee and St. Andrews.

*JWK Properties (327210) and Mrs D Jeffrey (548760)* request that Craigend (near Methven) is considered as a suitable location for a new village instead of some of the West/North West Perth sites.

*Roscco Properties (442290)* requests that consideration is given to land east of Friarton Bridge in Perth as an additional/alternative area for future employment development.

*Stewart Milne Homes (539251)* requests that Auchterarder should be identified as a Strategic

Development Area and shown in Table 1 on page 15 of the Proposed Plan.

**Wallace Planning Ltd for National Grid (547863)** requests that "Dundee Centre and Port Strategic Development Area" includes "Dock Street" which includes the gas holder site.

## **Summary of responses (including reasons) by Planning Authority:**

### **RESPONSES TO REPRESENTATIONS SEEKING CHANGE**

An assessment of strategic sites was undertaken as part of TAYplans Background Technical Note 2010 (pages 119-127) (013/SL/Doc9) to help understand whether they would impact on important environmental designations and any possible infrastructure implications. The sites assessed were a combination of those already allocated in approved Structure Plans or have planning permission or were submitted by developers during the TAYplan Awareness Raising Initial Consultation in August/September 2009. Some of the sites submitted were considered to be too small and not strategic in significance and were therefore not assessed. These could be assessed as part of the Local Development Plan Process if submitted to the respective Local Authority.

Circular 1/2009 (paragraph 45) (013/SL/Doc10), the Scottish Government considers it good practice to draw from existing Plans within the first generation of Strategic Development Plans. Paragraph 78 of Circular 1/2009 (013/SL/Doc11) also says that reporters should generally not recommend modifications to parts of plans that have been examined in previous examinations or rolled forward from previous plans, unless circumstances have clearly changed.

In addition, the Proposed Plan stage of the production of a Strategic Development Plan is not the stage for the introduction of alternative sites that have not been considered through the Main Issues Report stage.

### **ALTERNATIVE STRATEGIC DEVELOPMENT AREAS– GUARDBRIDGE**

Issue raised by **Alaric Hopgood (548889); Colin McAllister (545660); D Graham Wynd (513279); Flora Selwyn (542815); Howard Greenwell (546652); Irene Duncan (547693); Mrs Judith Harding (377831), Miss Marianne Baird (544315); Roy de C Chapman (548419); Miss Sarah Hunt (548386); St. Andrews Greenbelt Forum (328791)** and **St. Andrews Preservation Trust (547750)**: It is considered that the former paper mill at Guardbridge is not of a scale or site size (9.6 hectares) that would be considered to be a potential Strategic Development Area in its own right. The Approved Fife Structure Plan (2009) (CL/Doc39) does not identify it as a Strategic Development Area and considers that smaller scale developments will be identified in through its Local Plans and future Local Development Plans. TAYplan Topic Paper 6 – Spatial Strategy (paragraph 5.10) (013/SL/Doc12) specifically mentions the potential for development at Guardbridge, in particular the regeneration of the former paper mill, but will, be of a scale and function of development which reflects the role of a tier 3 settlement.

Scottish Environment Protection Agency also advised that the development of the former paper mill site could be contrary to Scottish Government guidance as it lies within the 200 year coastal flood envelope and should be the subject of a Flood Risk Assessment. This may mean that not all of the 9.6 hectares would be developable.

It is also important to note that St. Andrews University has confirmed in their representation (PLAN732) to the Proposed Plan that it has purchased the former paper mill with the intention to develop an Energy Centre with the heat and power piped to St. Andrews. The remainder of the site could be developed for related uses such as accommodating spin off companies involved in energy research, community and commercial activities. This is in addition to the Science Park

element of the St Andrews. Strategic Development Area.

In addition the area indicated for the University Science Park as part of the St. Andrews Strategic Development Area will be close to the A91, existing facilities and activities on land in the control of the University. It would therefore seem sensible to locate the proposed Science Park in a location close to existing University facilities. Fife Structure Plan 2009 (page 18) (013/SL/Doc13) is also clear that a large proportion of the required housing for St. Andrews should be located to the west of the town and in particular the Strategic Land Allocation. The Finalised St. Andrews and East Fife Local Plan 2009 also promotes (page 87) (013/SL/Doc14) the western extension with the development of a masterplan. There are no new material considerations relating to the St. Andrews Strategic Development Area and it remains important to the overall strategy.

### **ALTERNATIVE STRATEGIC DEVELOPMENT AREAS– CARSE OF GOWRIE**

Issue raised by **Andrew McCafferty Associates for GD Strawson & J Farquharson (548151); GS Brown Construction (543112); Jim Farquharson (546432)** and **Smiths Gore for Errol Park Estate (442871)**: According to Scottish Planning Policy (paragraphs 84 and 85) (013/SL/Doc15) the majority of housing land requirements should be met within or adjacent to existing settlements as this approach will help to minimise servicing costs and sustain local schools, shops and services. A new settlement may be considered appropriate if it is justified by the scale and nature of the housing land requirement, and:

- there are physical, environmental or infrastructural constraints to the further growth of existing settlements,
- it is part of a strategy for promoting rural development and regeneration,
- it could assist in reducing development pressure on other greenfield land,
- it can be readily serviced by public transport,
- it will not have a significant adverse effect on any natural or built heritage interest safeguarded by a national or international designation, and,
- it will not result in other significant environmental disbenefits, for example promoting development in areas of high flood risk.

One of the key cross boundary issues affecting the TAYplan area is the need to reduce and stop the population decline in Dundee and to achieve growth in the city. The Carse of Gowrie is seen as an attractive place to live as it is within easy reach of Dundee with its employment opportunities, services and other facilities. TAYplan Main Issues Report (Paragraphs 9.12-9.16) (013/SL/Doc16) did consider the Carse of Gowrie as an alternative strategy for large scale development. TAYplan Topic Paper 2 – Growth Strategy (Paragraph 5.16) (013/SL/Doc17) identified that no major housing land releases should take place in areas such as the Carse of Gowrie. TAYplan opted for a preferred strategy which concentrates new housing development within or close to Perth and Dundee. A consequence of this strategy is that the allocation of significant amounts of land outwith Dundee in the eastern and central Carse of Gowrie would undermine the preferred TAYplan strategy because it would prejudice the delivery of existing Strategic Development Areas or regeneration within the Core Areas of Perth and Dundee. Only modest development opportunities in the Carse of Gowrie should be considered and this is an issue for the Local Development Plan. The scale of development proposed in particular by **Andrew McCafferty Associates for GD Strawson & J Farquharson (548151)** and **Smiths Gore for Errol Park Estate (442871)** are of a scale that does not meet the preferred spatial strategy of TAYplan and its development would seriously compromise the aspirations for both Dundee and Perth city.

In addition TAYplans Strategic Environmental Assessment (Paragraphs 7.15-7.16) (013/SL/Doc18) concluded that substantial parts of the Carse of Gowrie are already at medium to high flood risk which could increase with expected sea level rise. Locating large scale development in the Carse of Gowrie would place households and businesses at increasing flood

risk with less flood defence systems in place in comparison to Perth city centre.

## **ALTERNATIVE STRATEGIC DEVELOPMENT AREAS – DUNDEE**

***DG Coutts for Linlathen Developments(346407); EMAC Planning for (A&J Stephen Ltd/Bett Homes (548522); Angus Estates Ltd (445204); M Batchelor (548360); Stewart Milne Homes (548524)); Halliday Fraser Munro for Barratt Homes (548389); Karen Clark Planning for Balmossie Developments Ltd & Messrs David Reid Farmers (443893); Scottish Property Federation (444087) and Stewart Milne Homes (539251):*** The following sites within the Dundee Core Area were assessed as part of TAYplans Background Technical Note 2010 (pages 119-127) (013/SL/Doc9)

- Ashdownie/Ashludie Farms, Monifieth
- Carlogie, Carnoustie
- Berryhill Farm, Dundee;
- Linlathen, Arbroath Road, Dundee;
- Dundee Western Gateway; and
- East Dundee Port Rail Freight Facility, Dundee

From these assessments it was considered that Linlathen and Dundee Western Gateway should be brought forward as Strategic Development Areas and East Dundee Port Rail Freight Facility could form part of the existing Dundee and Port Strategic Development Area. Berryhill Farm was found to require significant transport and education infrastructure improvements. It was also not considered as a suitable strategic site because it is located in the countryside with no services. Therefore it is not considered to be an effective or sustainable site. Development at such a location is also considered that it will have an adverse impact on the surrounding landscape. There are known infrastructure issues especially drainage surrounding the sites promoted in Monifieth and Carnoustie leading to issues over their effectiveness during the Strategic Plan period. The TAYplan Topic Paper 2 – Growth Strategy (Paragraph 5.24) (013/SL/Doc19) considered that the site at Carnoustie, although large in scale, will only play a significant role locally and if developed would not singularly affect the delivery of the Strategic Development Plan.

Seeking growth in locations outside of Dundee city are considered likely to fuel a growth in road based commuting. This is not consistent with the objectives of the Proposed Plan and is contrary to Policy 1 and has the potential to adversely impact on Policy 3. Policy 5 Part C of the Proposed Plan also helps clarify the presumption against housing land releases in the areas surrounding Dundee. It is not a blanket restriction on housing development and it places the onus on developers/land owners to demonstrate that housing proposals would not prejudice the delivery of Strategic Development Areas or regeneration within the core areas or conflict with other parts of the Strategic Development Plan. However, given the parameters of Policy 1 Part A, of the Proposed Plan the scale of any development in such locations should be small. The non inclusion of the above sites and others within the Dundee Core Area does not represent their deletion or importance and should remain part of the Local Development Plan process.

In addition to this if sites/areas have not been put forward as potential Strategic Development Areas during the Awareness Raising Initial Consultation in August/September 2009 and the Main Issues Report Consultation in 2010, then it is considered that the Proposed Plan stage of the planning process is too late for landowners/agents to be submitting sites for consideration.

## **ALTERNATIVE STRATEGIC DEVELOPMENT SITE – OTHER SITES**

Issue raised by **Alaric Hopgood (54889)** It should be stressed that the submission was submitted prior to the announcement on the future of RAF Leuchars. However, on July 18<sup>th</sup> 2011, the Secretary of State for Defence, the Rt Hon Dr Liam Fox MP (CL/Doc64) announced to the House of Commons that RAF Leuchars would close as an RAF station in 2015 and would later be taken over by the British Army as a base for two battalion/regiment sized units and a head quarters for a new multi-role brigade. Although the number of personnel anticipated would represent an increase of about 150 plus dependents there is understood to be a likelihood of a transition period between the RAF vacating the site and the Army moving in. During this time RAF personnel living outside the base may need to sell property so they can move to locations to which they have been redeployed. This may mean that some of the potential property available to newly arriving Army personnel and their families has already been sold and, as such, the St. Andrews West Strategic Development Area provides off-base housing within the locality.

Issue raised by **Dr Peter Symon (548525)** Scottish Environmental Protection Agency has not indicated that there is any significant flood risk at the Strategic Development Area at Oudenarde that could cause them to object to its development. The hierarchal strategy set out in the TAYplan Main Issues Report (Paragraphs 9.7-9.8) (013/SL/Doc20) recognises that Perth and its core area is the dominant centre in Perth & Kinross. TAYplan proposes that the majority of new development in the Perth Area should be directed towards this Core Area which includes the Strategic Development Area at Oudenarde. The TAYplan strategy seeks to ensure the promotion of alternatives to the car while continuing to enhance accessibility to residential, employment, commercial and leisure areas. The greatest scope for an integrated approach to transport provision is identified in core areas of Perth which includes Oudenarde as it is in close proximity and is well linked by transport. Perth & Kinross Council has safeguarded land to develop a train station at this location. In addition to this the Strategic Development Area at Oudenarde is very advanced in the planning process as it is an allocated site in the Approved Perth & Kinross Structure Plan 2003. Planning Permission has been granted for part of the site under 08/00610/OUT (013/SL/Doc21) for a travel lodge and associated uses under Classes 3, 7 & 8 and a business park incorporating use classes 1, 4, 5 & 6. In addition implementation of the Planning Permission has already begun with development of some of the affordable homes. It is considered that a new Strategic Development Area at Kinross would fundamentally undermine the preferred TAYplan strategy and would take a considerable level of work and time to get to the situation where Oudenarde is now at in terms of the planning process. In addition to this if sites/areas have not been put forward as potential Strategic Development Areas during the Awareness Raising Initial Consultation in August/September 2009 and the Main Issues Report Consultation in 2010, it is considered that the Proposed Plan stage of the planning process is too late to submit land/sites for consideration.

Issue raised by **GM Gall (547768)** It is considered that Kinloch Rannoch would not be a very sustainable location for an alternative Strategic Development Area to Dundee or St. Andrews because of its remoteness and limited access to the transport network. It is considered too small to accommodate a Strategic Development Area as it does not have the capacity or infrastructure to accommodate large scale development and could in effect lead to the creation of a new settlement. On this basis there is no need for TAYplan to consider additional sites for any smaller settlements within the TAYplan region and this is a role for the Local Development Plans.

Issue raised by **JWK Properties (327210)** and **Mrs D Jeffrey (548760)** According to Scottish Planning Policy (paragraphs 84 and 85) (013/SL/Doc15) the majority of housing land requirements should be met within or adjacent to existing settlements as this approach will help to minimise servicing costs and sustain local schools, shops and services. The SPP advises that a new settlement may be considered appropriate if it is justified by the scale and nature of the housing land requirement, and:

- there are physical, environmental or infrastructural constraints to the further growth of existing settlements,
- it is part of a strategy for promoting rural development and regeneration,
- it could assist in reducing development pressure on other greenfield land,
- it can be readily serviced by public transport,
- it will not have a significant adverse effect on any natural or built heritage interest safeguarded by a national or international designation, and
- it will not result in other significant environmental disbenefits, for example promoting development in areas of high flood risk.

Craigend (near Methven) was considered as a location for a new settlement during the Main Issues Report consultation in 2010 and the TAYplan Awareness Raising Initial Consultation in August/September 2009. This site has been assessed by TAYplan at Main Issues stage and has also been assessed by Perth & Kinross Council as a part of their Local Development Plan Main Issues Report 2010 (CL/Doc62). The area in question is outwith the Perth Core Area, within a different Housing Market Area (Strathearn), and development of the site is not considered the most sustainable as it would require significant road and public transport improvements, a new school, improved water and drainage infrastructure. Part of the site is at risk of flooding and there is some archaeological interest within the site. There is no evidence that the site is deliverable and development of a new village at this location will not meet TAYplan's agreed spatial strategy for the region which concentrates most development within the Core Areas of Dundee and Perth as these had the best existing infrastructure and services that could accommodate large scale development and expansion. The Craigend site is just outwith the Perth Housing Market Area and therefore would not, as a strategic proposal, be an alternative to development to the West/North West of Perth. It is considered to be contrary to both the TAYplan strategy and Perth & Kinross's strategy because of its location. Any change to include this site would fundamentally undermine the Plan's strategy. The allocation of a significant area of land outwith the Perth Core Area would fundamentally undermine the preferred TAYplan strategy because it would prejudice the delivery of the existing Strategic Development Areas and regeneration within the Perth Core Area.

**Roscco Properties (442290)** The area in question east of the Friarton Bridge in Perth is not of a scale or nature that would constitute a strategic site as its development for retail or other uses would not singularly affect the implementation of the Strategic Development Plan. This is an issue that should be dealt with at Local Development Plan level.

Issue raised by **Stewart Milne Homes (539251)** It is considered that Auchterarder should not be identified as a Strategic Development Area. Auchterarder Development Framework (CL/Doc81) will provide over 800 dwellings when completed and 4 hectares of economic development land it is not considered that the development is strategic in nature or will have cross boundary impacts. It is considered that any impact development of this site will have will be mainly confined to the to the Strathearn housing market area. Because of its nature it would not constitute a strategic site as its development would not singularly affect the implementation of the Strategic Development Plan. This is an issue that should be dealt with further at Local Development Plan level.

Issue raised by **Wallace Planning Ltd for National Grid (547863)** requests that "Dundee Centre and Port Strategic Development Area" includes "Dock Street" which includes the gas holder site. The gas holder site is an existing urban brownfield site and is not of a scale or nature that would constitute a strategic site as its development for retail or other uses would not singularly affect the implementation of the Strategic Development Plan. This is an issue that should be dealt with at Local Development Plan level.

## **CONCLUSION**

It is considered that the existing and proposed Strategic Development Areas are effective for delivering during the Plan period. Schedule 4 – Issue 15 explains in further detail the issue of effective sites. If the effectiveness of housing land supply was an issue, it is not considered an additional or alternative Strategic Development Area is required. Any alternative sites that have been submitted have not been demonstrated as being effective or not of a scale or nature that could be considered a Strategic Development Area.

TAYplan considers that the issues raised does not warrant any change to the Proposed Strategic Development Plan (June, 2011) and propose that the elements dealt with in this Schedule 4 Summary of Unresolved Issues remain as written and unchanged.

<b>Reporter's conclusions:</b>
[Note: For DPEA use only.]
<b>Reporter's recommendations:</b>
[Note: For DPEA use only.]

## **2. Copy of representations pertinent to this issue**

**3. Library of documents and extracts (less than 50 pages) referred to within representations and/or this Schedule**