

**TAYplan Strategic Development Plan Authority**

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

*Issue number 3: Policy 1: Location Priorities – Policy 1A*

## Contents

1. Summary of Unresolved Issues
2. Copy of actual representations pertinent to this issue ( <i>Personal details have been redacted. Full details have been provided to the DPEA separately.</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 TAYplan's online 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>Issue Number 3: Policy 1: Location Priorities – Policy 1A</b>		
<b>Development plan reference:</b>	Page 9: Policy 1, Part A	<b>Reporter:</b> [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue and representation references		
<b>Seeking a change</b>		
<b>ID Number</b>	<b>Person / Organisation</b>	<b>Representation Reference</b>
548872	Alyth Community Council	PLAN821
548151	Andrew McCafferty Associates for GD Strawson and J Farquharson	PLAN445
548151	Andrew McCafferty Associates for GD Strawson and J Farquharson	PLAN736
545593	Auchterhouse Community Council	PLAN468
443109	Barton Willmore for Scotia Homes	PLAN376
337727	Colliers International for Gleneagles Hotel	PLAN52
416017	Colliers International for Persimmon Homes Limited	PLAN40
541486	Colliers International for Taylor Wimpey East Scotland	PLAN63
548117	Dundas Estates & Development Company	PLAN430
445201	Emac Planning for A & J Stephen Limited	PLAN683
445201	Emac Planning for A & J Stephen Limited	PLAN684
445201	Emac Planning for A & J Stephen Limited	PLAN685
445201	Emac Planning for A & J Stephen Limited	PLAN687
445201	Emac Planning for A & J Stephen Limited	PLAN692
548522	Emac Planning for A & J Stephen Limited / Bett Homes Limited	PLAN731
548522	Emac Planning for A & J Stephen Limited / Bett Homes Limited	PLAN733
548522	Emac Planning for A & J Stephen Limited / Bett Homes Limited	PLAN735
445204	Emac Planning for Angus Estates Limited	PLAN599
445204	Emac Planning for Angus Estates Limited	PLAN601
548523	Emac Planning for Bett Homes Limited	PLAN760
548523	Emac Planning for Bett Homes Limited	PLAN762
445206	Emac Planning for J G Lang & Son	PLAN535
445206	Emac Planning for J G Lang & Son	PLAN539
445203	Emac Planning for James Keiller Estates	PLAN714
548383	Emac Planning for L Porter	PLAN548
548301	Emac Planning for M Batchelor (K)	PLAN518
548301	Emac Planning for M Batchelor (K)	PLAN527
445207	Emac Planning for Mr W Robertson	PLAN571
445205	Emac Planning for Mr R Watson	PLAN509
445205	Emac Planning for Mr R Watson	PLAN513
548524	Emac Planning for Stewart Milne Homes	PLAN777
543112	GS Brown Construction	PLAN84

543112	GS Brown Construction	PLAN87
547268	GVA Grimley for David Wilson Homes	PLAN448
548948	Hargest Planning Limited	PLAN855
442882	Homes for Scotland	PLAN214
327210	J Khazaka	PLAN932
546432	Jim Farquharson	PLAN208
443893	Karen Clark for Balmossie Developments Limited and Messrs David Reid Farmers	PLAN528
346689	Karen Clark for Discovery Homes	PLAN203
346689	Karen Clark for Discovery Homes	PLAN542
443979	Lynne Palmer	PLAN153
548414	Miss Lynn McGeorge	PLAN607
444081	Montagu Evans	PLAN320
444081	Montagu Evans	PLAN458
444081	Montagu Evans	PLAN460
349140	Montgomery Forgan Associates for Headon Developments Limited	PLAN608
527724	Mr David Dykes	PLAN481
546652	Mr Howard Greenwell	PLAN255
548055	Mr Ian Fowler	PLAN386
548486	Mr Ken Miles	PLAN831
337567	Mr Kyffin Roberts	PLAN507
548760	Mrs D Jeffrey	PLAN810
344874	Mr Stewart McKiddie	PLAN645
548250	Ms Joan McEwen Sprunt	PLAN476
450286	Muir Group	PLAN167
548051	Muir Smith Evans for Muir Homes Limited	PLAN388
548051	Muir Smith Evans for Muir Homes Limited	PLAN406
547478	Professor Christopher M Steel	PLAN280
442290	Roscco Properties	PLAN162
453889	Royal Burgh of St. Andrews Community Council	PLAN919
330884	Ryden for Bon Accord Land Limited / Stewart Milne Homes	PLAN127
330884	Ryden for Bon Accord Land Limited / Stewart Milne Homes	PLAN128
548506	Ryden for University of St. Andrews	PLAN742
548386	Sarah Hunt	PLAN545
547388	SEStran Regional Transport Partnership	PLAN272
442871	Smiths Gore for Errol Park Estate	PLAN628
539251	Stewart Milne Homes	PLAN312
539251	Stewart Milne Homes	PLAN313
539251	Stewart Milne Homes	PLAN314
539251	Stewart Milne Homes	PLAN315
539251	Stewart Milne Homes	PLAN317
539251	Stewart Milne Homes	PLAN319
539251	Stewart Milne Homes	PLAN321
539251	Stewart Milne Homes	PLAN322
539251	Stewart Milne Homes	PLAN345
546153	Strathkinness Community Council	PLAN194
346675	TMS Planning for Muir Homes Limited	PLAN354
346675	TMS Planning for Muir Homes Limited	PLAN355

## Support as written

<b>ID Number</b>	<b>Person / Organisation</b>	<b>Representation Reference</b>
376787	Abernethy & District Community Council	PLAN118
419429	Auchterarder & District Community Council	PLAN76
423150	Braes of the Carse Conservation Group	PLAN21
337727	Colliers International for Gleneagles Hotel	PLAN53
337727	Colliers International for Gleneagles Hotel	PLAN54
416017	Colliers International for Persimmon Homes Limited	PLAN38
416017	Colliers International for Persimmon Homes Limited	PLAN39
416017	Colliers International for Persimmon Homes Limited	PLAN41
541886	Colliers International for Taylor Wimpey East Scotland	PLAN61
541486	Colliers International for Taylor Wimpey East Scotland	PLAN62
541486	Colliers International for Taylor Wimpey East Scotland	PLAN64
450613	Councillor Michael A Barnacle	PLAN812
346407	D G Coutts Associates for Linlathen Developments	PLAN284
548029	DPP LLP for Kinross Estate Company	PLAN441
548113	DTZ for Headon Developments	PLAN514
379723	Dunning Community Council	PLAN435
445201	Emac Planning for A & J Stephen Limited	PLAN683
445201	Emac Planning for A & J Stephen Limited	PLAN690
548522	Emac Planning for A & J Stephen Limited / Bett Homes Limited	PLAN731
445204	Emac Planning for Angus Estates Limited	PLAN599
548523	Emac Planning for Bett Homes Limited	PLAN760
548523	Emac Planning for Bett Homes Limited	PLAN761
445206	Emac Planning for J G Lang & Son	PLAN535
548383	Emac Planning for L Porter	PLAN548
548301	Emac Planning for M Batchelor (K)	PLAN518
445205	Emac Planning for Mr R Watson	PLAN509
548524	Emac Planning for Stewart Milne Homes	PLAN777
548948	Hargest Planning Limited	PLAN856
445299	Inchture Area Community Council	PLAN800
263542	Kingsbarns Community Council	PLAN377
546838	Kinross-shire Civic Trust	PLAN493
450207	Largo Area Community Council	PLAN436
442806	Loch Lomond and The Trossachs National Park Authority	PLAN101
450585	Methven & District Community Council	PLAN862
444081	Montagu Evans	PLAN456
343111	Montagu Evans LLP for Wallace Land Investment Management	PLAN333
445161	Montgomery Forgan Associates for Morris Leslie Group	PLAN653
442083	Montgomery Forgan Associates for Strategic Land (Scotland) Limited	PLAN276
442083	Montgomery Forgan Associates for Strategic Land (Scotland) Limited	PLAN277
331497	Montgomery Forgan Associates for Taylor Wimpey	PLAN273
331497	Montgomery Forgan Associates for Taylor Wimpey	PLAN275

349134	Montgomery Forgan Associates for VGH (VICO Limited/Bett Homes/Headon Developments Limited)	PLAN574
548051	Muir Smith Evans for Muir Homes Limited	PLAN691
349010	PPCA Limited for Alfred Stewart Properties Limited	PLAN15
548506	Ryden for University of St. Andrews	PLAN746
548335	Savills for John Dewar Lamberkin Trust and Needhill LLP	PLAN651
344939	Scottish Enterprise	PLAN423
442031	Scottish Environmental Protection Agency	PLAN170
442031	Scottish Environmental Protection Agency	PLAN171
344848	Scottish Natural Heritage	PLAN414
547388	SEStran Regional Transport Partnership	PLAN272
442870	Smiths Gore for Mansfield Estates	PLAN544
539251	Stewart Milne Homes	PLAN323
441235	Tactran Regional Transport Partnership	PLAN94
<b>Provision of the development plan to which the issue relates:</b>	Relates to Policy 1, Part A.	

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

**SUMMARY OF REPRESENTATIONS SEEKING A CHANGE**

**GENERAL**

***Auchterhouse Community Council (545593); Karen Clark (for Balmossie Developments Limited and Messrs David Reid Farmers (443893); and, Discovery Homes(346689 - PLAN542))*** have indicated that that boundaries shown on the map on Page 9 is too vague. The respondents have therefore requested that the Core Areas should be more clearly defined. ***Karen Clark for Balmossie Developments Limited and Messrs David Reid Farmers (443893)*** also consider that the Eastern Villages of Dundee should be included as there is a clear opportunity to improve the sustainability and setting of Balmossie Village.

***Colliers International for Gleneagles Hotel (337727)*** consider that paragraph 7 on Page 8 is misleading and therefore the locations, Pitlochry and St. Andrews should be deleted or should include other locations such as Gleneagles. Alternatively, the respondent suggests that all location names should be removed.

***Colliers International for Persimmon Homes Limited (416017)*** consider that the Policy wording states Tier 2 settlements "have the potential to make a major contribution to the regional economy, but will accommodate a small share of the region's additional development." It is acknowledged that Tier 2 settlements should 'proportionately' accommodate the region's additional development (outwith Dundee and Perth Core Areas). However the respondent considers the town of Kinross can offer more than simply a "small share" given its proximity to a major motorway (M90) and the potential for growth aligned with the SESplan proposed strategy of growth in South Fife at the Forth Bridgehead area. Kinross has the land availability and essential infrastructure capacity to accommodate a proportionate share (a greater balance than currently proposed) to meet the Plan's requirement to provide land release necessary for the plan period. Whilst not objecting to the identification of Kinross as a Tier 2 settlement, the respondent suggests reword of the text to change "small share" to "proportionate share".

**EMAC Planning (for A & J Stephen Limited (445201 - PLAN683); A & J Stephen Limited (445201 - PLAN684); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN731); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN733); Angus Estates Limited (445204 - PLAN599); Bett Homes Limited (548523 - PLAN760); J G Lang & Son (445206 - PLAN535); and Stewart Milne Homes (548524 - PLAN777))** the respondents consider that non-Strategic Development Area settlements identified in Tier 2 should be removed together with Tier 3 settlements and the settlement priorities left for the more detailed Local Development Plan's to determine.

**EMAC Planning (for A & J Stephen Limited (445201 - PLAN687); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN735); Angus Estates Limited (445204 – PLAN601); and Bett Homes Limited (548523 - PLAN762))** consider that TAYplan should not be setting a hierarchy for each of the settlements within the TAYplan area as this is a matter that should be dealt with by the emerging Local Development Plan's and in the context of each housing market area. With the ongoing concern that many of the sites within the existing supply cannot be delivered timeously in the short to medium term then TAYplan should not artificially constrain the ability of the emerging Local Development Plan's to carry out the detailed site appraisal work at the local level.

**EMAC Planning for L Porter (548383)** consider that on a plan-wide basis a better approach would be for the development hierarchy to be removed from the TAYplan, with the Proposals 1: Map showing only the strategic growth areas, that is, the Core Areas and Strategic Development Areas. All other key service settlements could be identified for growth through the Local Development Plan process.

**Andrew McCafferty Associates for GD Strawson and J Farquharson (548151 – PLAN736)** have indicated that there is no definition of the term "Undeveloped Coastline" in the Plan and the lack of clarity over the extent of area that is proposed to be covered by this designation means that the notation on both Proposals 1: Map and the map on page 9 should be removed. Some parts of the coastline are already protected by statutory and non statutory designations. There are also riparian areas that lie within flood risk areas and these are shown on SEPA's flood risk maps. TAYplan's use of the term "Undeveloped Coastline" is unclear and will lead to confusion in its application and should be deleted from the Plan.

**Homes for Scotland (442882); Stewart Milne Homes (539251 - PLAN322); and Montagu Evans (444081 – PLAN320)** comment that the two largest settlements (Dundee and Perth) will always form the key areas for economic drive and the largest land releases. However, putting other settlements within the Plan area into a tiering system prevents unnecessarily the natural growth and development of some of the settlements. Therefore the development should be removed. All the major service centres should be allowed to grow and develop in line with market demand and economic prosperity. Local Development Plans should be used to determine the level of growth of settlements, without being unduly restricted by the Strategic Development Plan.

**J Khazaka (327210)** considers that the statement "There will be no need for any new settlements during the lifetime of this Plan." Should be removed from the Proposed Plan .

**Montagu Evans (444081)** although supporting the statement within Policy 1, Part A which states that Local Developments Plans may also provide for some development in settlements that are not principle settlements. It is considered that this policy should also state that the land allocated for development should be land that can be brought forward and developed within the plan period.

**Mr Ian Fowler (548055)** considers that the Proposed Plan lacks any detailed information on development location or how it will be controlled. In addition, the respondent considers that

there seems to be a lot of general comments and promises but no fine detail on how the plan will be implemented to reassure the public.

**Muir Group (450286)** considers that Tiers 2 and 3 should be omitted and substituted by a statement to the effect that the balance of development should be distributed amongst the region's remaining settlements in accordance with demand/need within each housing market area.

**Ryden (for Bon Accord Land Limited / Stewart Milne Homes (330884); and Ryden for Bon Accord Land Limited / Stewart Milne Homes (330884 - PLAN128))** has made the following comments:

- Consider that too much emphasis is placed on Dundee and Perth as economic drivers. There are other locations, such as Montrose which have the ability to be an economic driver, which should be reflected in the TAYplan.
- The respondent also considers that an explanation or justification for the categorisation of the settlement hierarchy is required. The current classification contradicts itself.
- If a tier two settlement makes a major contribution to the regional economy, they should be given the opportunity to accommodate a larger share of new development. The identification of land for development should be made on the merits of each settlement, not where it fits in the hierarchy.

### **DUNDEE CORE AREA**

**EMAC Planning for A & J Stephen Limited (445201 - PLAN685)** consider that there is market demand for development to the north west of Dundee at Birkhill, i.e. as part of the Dundee Core Area. The respondent recognises and welcomes the identification of 'Birkhill/Muirhead' as a stated element of the Dundee Core Area and the priority for land release for development within this Tier 1 area, however the deliverability of identified land within the Dundee and South Angus Housing Market Area has been uncertain for a number of years, especially given the history of non-deliverability of the Dundee Western Gateway housing allocations. It is considered that the Western Gateway will continue to face difficulties and may not be delivered in the early phases of the Plan period. As a result, other short and medium term effective housing greenfield releases such as land to the south of Birkhill, require to be made around the City of Dundee to address supply issues.

**Karen Clark for Discovery Homes (346689 - PLAN203)** although generally supportive of the focus of housing release towards the main settlements, the respondent considers that as demonstrated over recent years, a housing allocation does not guarantee development on site, which is recognised in Scottish Planning Policy. In terms of the Western Gateway, in spite of the best efforts of all parties, the respondent highlights that development has not yet progressed. In light of this very recent experience the respondent considers that it is essential for the continuity of delivery of housing land that there is a range of housing land release. In this way the opportunities to maintain an effective housing land supply will be maximised. It is submitted that a spread of housing land release is required across the main settlements to provide choice, minimise traffic movement, and support strategic economic land release ensuring sustainable access to jobs within all parts of the principle settlements.

**Karen Clark for Discovery Homes (346689 - PLAN542)** considers that Location Priorities should recognise that, particularly in the Dundee area where the administrative boundaries have been drawn very tightly around the City with no area of "urban fringe" included within the City boundaries, that the Tier 1 catchments makes some recognition of the urban fringe areas, particularly where the redevelopment of brownfield land is proposed.

**Mr Stewart McKiddie (344874)** considers that Newport and Wormit should be deleted from the Dundee Core Area.

**Stewart Milne Homes (539251 - PLAN313); Stewart Milne Homes (539251 - PLAN314); and Stewart Milne Homes (539251 - PLAN315):-** consider that the villages of Liff, Ballumbie & Duntrune should be included within the Dundee Core Area.

**Stewart Milne Homes (539251 - PLAN319 and PLAN321)** considers that a wider cross section of land be identified for development within the Dundee City Core Area to ensure there is an adequate supply of unconstrained developable land that can be effective from the early stages of the Plan.

### **PERTH CORE AREA**

**EMAC Planning for A & J Stephen Limited (445201 - PLAN692)** consider that the Perth Core should be amended to cover "an area within approximately 25 minutes travel by local bus from the centre of Perth". This definition is used within the current Perth & Kinross Structure Plan 2003 and has been well understood by officials, elected Members and investors for many years and is a far more strategic assessment of the Perth Core Area. It is clear that relevant and consistent measure should be adopted in the formulation of TAYplan. The plan is a rolling forward of the existing strategic planning context and there is no reason to change this definition.

**GS Brown Construction (543112)** comment that in relation to the Perth Core Area, the majority of new development is earmarked for the Perth North West expansion scheme and Oudenarde which the respondent considers are jeopardised, in different ways by education and roads infrastructure costs. It is not clear how the plan envisages a solution to these problems.

**Jim Farquharson (546432)** is concerned about the justification for further development in Perth when flooding is not only a risk but in fact is a reality, even in mid- summer. The respondent further comments that there is no record of flooding in the Carse of Gowrie.

**Lynne Palmer (443979)** considers that Bridgend should form part of the Perth Core Area. The respondent considers that Bridgend is a congested area in terms of traffic, pollution, housing and land space.

**Miss Lynn McGeorge (548414)** considers that Luncarty, Stanley, Balbeggie and Perth Airport should not be included within the Perth Core Area.

**Mr David Dykes (527724)** considers that Scone should not be part of Perth Core Area as this will destroy Scone's identity.

**Mrs D Jeffrey (548760)** has commented that the developer promoting a new settlement at Craigend, Perthshire (which complies with the national policy of sustainability) has already pledged, not merely to make contributions, but to fund all the infrastructure and the school, thereby relieving the Local Authority and tax payers from this financial burden. The respondent therefore considers that the prospect of building new settlements should not be discounted.

**Ms Joan McEwen Sprunt (548250)** considers that the Perth Core Area should include the Carse of Gowrie and Guildtown.

## **ST. ANDREWS**

**Hargest Planning Limited (548948)** comment that in the text of Policy 1, Part A it is stated that there will be no additional strategic development in the foreseeable future beyond the St. Andrews Strategic Development Area. St. Andrews is proposed as a Tier 2 settlement - it is clearly the focus of population, employment and services in the North East of Fife. The respondent therefore considers that this statement in relating to St. Andrews within Policy 1 is inappropriate and inconsistent with information and analysis set out in support of the draft Strategic Development Plan. **Montgomery Forgan Associates for Headon Developments Limited (349140)** are concerned about the vague and ambiguous nature of the statement "Beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale in the foreseeable future." and request that the terms and purpose/objective of this part of Policy 1 Part A be clarified and confirmed. Until this is done, the respondent does not consider that there is a strategic justification for setting a development ceiling for St. Andrews. **Mr Howard Greenwell (546652)** has requested an amendment to the text relating to "Beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale in the foreseeable future" to say "For St. Andrews there will be no additional strategic development in the foreseeable future".

**Mr Kyffin Roberts (337567); and Royal Burgh of St. Andrews Community Council (453889 - PLAN919)** has requested a number of amendments to Policy 1, Part A, including:-

- A change to the wording under Tier 2 Settlements; and,
- An amendment to the statement, "Beyond the Strategic Development Area in Policy 4 for St. Andrews..."

**Professor Christopher M Steel (547478)** considers that the designation of St. Andrews as a "second tier" centre of population should be clarified to mean St. Andrews and its hinterland - specifically including Guardbridge and Leuchars.

**Ryden for University of St. Andrews (548506)** note that the final paragraph under Policy 1 Location Priorities states that beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale in the foreseeable future. The respondent is concerned about the ill-defined and ambiguous nature of this statement. While content that an additional Strategic Development Area is unlikely to be allocated in the foreseeable future, it is not clear what comprises "additional strategic development", why such a policy is required and whether it will be used to prevent any additional development of a smaller scale but which has strategic importance in St. Andrews for which there may be a requirement.

**Sarah Hunt (548386)** considers that there is opportunity to develop at Guardbridge and Leuchars and that St. Andrews should be categorised as a small town.

**SEStran (547388)** although supportive of the principal settlements, the respondent considers that it is worth including an additional statement in relation to proposed development in St. Andrews.

**Strathkinness Community Council (546153)** have commented in relation to the future use of the base at RAF Leuchars. The Proposed Plan classifies Leuchars / Guardbridge as a Tier 3 settlement in terms of its development role, however the respondent is concerned about the impact on the communities, especially in relation to housing, schooling, transport and healthcare given the proposed change to RAF Leuchars.

## **OTHER SETTLEMENTS**

**Alyth Community Council (548872)** consider that as a Tier 3 Settlement it is disappointing that Alyth appears to be deemed as not requiring development.

**Barton Willmore for Scotia Homes (443109)** consider that Tier 2 settlements, such as Forfar, have the ability to accommodate sustainable economic growth and thus, contribute to the growth of the TAYplan region as a whole. This is further confirmed through the identification of Forfar as an "Agricultural Service Centre" within the proposed TAYplan. Whilst Forfar is identified as a Tier 2 settlement, this, by its very nature, acts as a barrier to potential future growth beyond that identified in the Proposed Plan. In the case of Forfar, the use of a tiered locational priority system, could potentially have a negative impact on its natural growth and development. In addition, the respondent considers that service centres such as Forfar should be allowed to grow at a rate commensurate to market demand and economic prosperity. The TAYplan should encourage development in these areas and seek to remove any potential restrictive policy wording on development which would compromise the sustainable economic development of the area.

**Colliers International for Taylor Wimpey East Scotland (541486)** acknowledge that Tier 2 settlements should 'proportionately' accommodate the region's additional development (outwith Dundee and Perth Core Areas). However it is considered the town of Crieff can offer more than simply a "small share" given its historical low growth in preference to Auchterarder (within the Strathearn Housing Market Area). There is a recognised demand (The Perth and Kinross Housing Needs and Demand Assessment) for family homes and signs that the Strathearn area will demand a greater proportion of growth in Perth and Kinross than other housing market areas. Crieff has the land availability and essential infrastructure capacity to accommodate a proportionate share (a greater balance than currently proposed) to meet the Plan's requirement to provide land release necessary for the plan period.

**Dundas Estates & Development Company (548117)** consider that Dundee and Perth will clearly form the key areas for investment and the development of the region as a whole. However, the growth of other settlements should not be constrained by placement within an artificial tiering system. In particular, the respondent cannot understand why Cupar, one of the principle county towns of Fife, would be placed in a tier behind the likes of Scone, Bridge of Earn and Tayport. Cupar is an established settlement benefiting from road and rail links, commercial services and community facilities. The town serves its own population and the outlying rural population. In order to support and build on the existing social and economic infrastructure, Cupar should be defined as a settlement capable of accommodating a large share of development.

**EMAC Planning for J G Lang & Son (445206 - PLAN539)** consider that TAYplan should encourage Local Development Plans to provide a generous supply of new housing and mixed use land in North Fife. The available supply is currently being constrained by the reliance on Strategic Allocations to deliver housing in the area. With particular reference to the Cupar Housing, Market Area, there is some concern over the deliverability of Cupar North, particularly within the time period anticipated. A strategy of higher growth over and above that indicated by the General Register Office for Scotland data, would allow the growth of other settlements in the area, including Springfield, where sites are capable of delivering effective housing land in the early periods of the TAYplan.

The respondent considers that it is vital to the sustainability of smaller settlements that some growth is now allowed over the next 20 years, supported by Scottish Planning Policy which states that decisions on the location of new development should amongst other factors promote rural development and regeneration. The commitment in the TAYplan to Local Development Plans providing for some development in settlements not defined as principle

settlements is supported. However, the respondent that a more generous supply of land needs to be identified to facilitate the growth required in the early periods of the Plan. Smaller settlements and sites are less likely to be constrained by high development costs and many of the villages in North Fife, including Springfield, would benefit from growth to sustain and enhance village services. It is considered that the moderate expansion of Springfield to the south could accommodate some of the growth requirements of the Cupar Housing Market Area on a site capable of delivering effective housing land within the first 5 years of the Plan. **EMAC Planning for James Keiller Estates (445203)** consider that TAYplan should support additional land releases to the north of Dundee along the A90 corridor at Inveraldie. It is suggested that the TAYplan identifies Inveraldie as a Principal Settlement, or alternatively, if the TAYplan removes Tiers 2 (Non-Strategic Development Areas) and Tier 3 settlements from Proposals 1:Map, TAYplan encourages support for the identification of Inveraldie as a Principal Settlement in the Local Development Plan.

**EMAC Planning (for M Batchelor (K) (548301); and Mr R Watson (445205 - PLAN509))** although supporting the identification of Dundee and Perth core areas as Tier 1 settlements, together with the identification of Strategic Development Areas within Tier 2, the respondent considers that non-Strategic Development Area settlements identified in Tier 2 should be removed together with Tier 3 settlements (option a). Alternatively, if the identification of other settlements in Tier 2 and 3 remains unchanged, Friockheim and Newbigging should be identified in Tier 3 of the hierarchy (option b). In addition, **EMAC Planning for Mr W Robertson (445207)** considers that TAYplan should provide either a specific planning policy for Crail Airfield or a general policy on the redevelopment of rural brownfield sites.

**Andrew McCafferty Associates for GD Strawson and J Farquharson (548151 - PLAN445)** consider that there is an over concentration of future growth at Perth and Dundee and the Plan should include reference to a new settlement at "Horn Grange" to consolidate the scatter of existing development and facilitate provision of social infrastructure such as a new secondary school which could serve the whole of the Carse of Gowrie's existing settlements.

**GS Brown Construction (543112 – PLAN87)** The plan is too heavily skewed towards development taking place in major settlements, thereby preventing natural growth and development of some of the smaller settlements. The Carse of Gowrie, lying as it does between the principal settlements of Perth and Dundee, should not be the subject of an outright presumption against any development. Flooding is not a problem of sufficient importance to justify such a restriction and the density of population in the corridor is actually a positive factor to be harnessed in encouraging a switch from private to public transport.

**GVA Grimley for David Wilson Homes (547268)** considers that TAYplan should be encouraging appropriate greenfield land release on effective sites on the periphery of the principal settlements. Although the town of Kinross has some environmental and landscape constraints which should be appropriately managed the respondent also considers that there is opportunity for some limited expansion to the east of the town.

**Montagu Evans (444081)** considers that there is a disproportionate concentration of development, strategically focused within Dundee and Perth population centres. It is considered that further recognition for residential development should be given to the southern corridor of the TAYplan area, in-particular the Kinross Housing Market Area which provides good transport routes from Glasgow and Edinburgh as well as the cities and towns of Stirling, Dunfermline, Kirkcaldy and Glenrothes.

**Mr Ken Miles (548486)** has requested that Kinross/Milnathort is reallocated to Tier 3 Settlement.

**Muir Smith Evans for Muir Homes Limited (548051 - PLAN388)** have commented that Auchterarder has previously been recognised as an appropriate location for growth. Auchterarder's location on a very significant transport corridor (bus, train and road) enhances its claim that it is capable of accommodating sustainable development. In this regard, the respondent considers that it is inappropriate for the Proposed Plan to classify Auchterarder as a Tier 3 settlement whilst at the same time classifying Crieff as a Tier 2 settlement. Auchterarder as a settlement has more in common with other settlements which are classified as Tier 2. It has very different characteristics to other settlements which are classified as Tier 3 (e.g. Aberfeldy and Anstruther). **Muir Smith Evans for Muir Homes Limited (548051 - PLAN406)** also commented that the revised additional allocation (400) agreed in February 2009 by Perth & Kinross Council remains relevant and that no evidence has been produced as part of the TAYplan process to explain why this agreed strategic position of only two years ago should now be set aside. The agreed position with Perth & Kinross Council should provide the baseline figure from which to review the full potential of Auchterarder in its contribution to both the Strathearn area as a whole and the A9 Corridor. If allocated as a Tier 3 centre that will not be possible. The respondent is also concerned that significant investment and expenditure in infrastructure has been made in Auchterarder - undertaken by a number of developers, including Muir Homes Limited. This infrastructure has been paid for by the developers and was based on further development areas being released in due course. If development is restricted at Auchterarder, money will have been wasted and infrastructure capacity will remain unused, neither of which can be called sustainable.

**Rosco Properties (442290)** consider that Auchterarder and surrounding settlements including Dunning should be tier 2, not tier 3.

**Smiths Gore for Errol Park Estate (442871 - PLAN628)** consider that Errol should also be identified as a Tier 3 settlement.

**Stewart Milne Homes (539251 - PLAN312); and Stewart Milne Homes (539251 - PLAN317)** considers that the development hierarchy be removed from the Plan with all key service settlements other than Dundee and Perth core areas given equal development opportunities where infrastructure provision or investment allows. If TAYplan seeks to retain the development hierarchy, Stewart Milne Homes proposes that Auchterarder and Carnoustie are categorised as a tier 2 settlement.

**Stewart Milne Homes (539251 - PLAN345)** consider the following settlements for inclusion as the Region's principle Settlements and Land Allocations for Home Building and in support of Employment Generation at Liff; Carnoustie; Duntrune / Ballumbie; Taybridgehead; Dundee City; Perth West; Auchterarder; Crieff; Burrelton and Blairgowrie; Gauldry; and Strathkinness

**TMS Planning (for Muir Homes Limited (346675 - PLAN354); and Muir Homes Limited (346675 - PLAN355))** consider that within the Proposed Plan details of the specific roles of the "principal settlements" and the rationale for this status (particularly for the Tier 3 settlements) should be clearly set out.

The rationale for rejecting other similarly sized settlements/those with similar characteristics and facilities from this elevated policy status (e.g. not considering these to be principal settlements) should also be clearly set out, towns such as Auchtermuchty.

In the absence of appropriate justification, particularly in light of the enhanced policy status, Newburgh should be deleted as a Tier 3 principal settlement. In addition, in light of its gateway location on the main A91, and its present and potential function as a service centre, the town of Auchtermuchty should be identified as a Tier 3 principal settlement. Even if the latter is rejected, TAYplan should identify the important contributions of settlements, such as Auchtermuchty, and the potential for further development in this and similar settlements in

order to positively contribute towards meeting the needs of TAYplan.

## **SUMMARY OF REPRESENTATIONS SUPPORTING AS WRITTEN**

### **GENERAL**

***Abernethy & District Community Council (376787); Colliers International for Gleneagles Hotel (337727); Colliers International for Persimmon Homes Limited (416017); Colliers International for Taylor Wimpey East Scotland (541486); and Scottish Natural Heritage (344848)*** support paragraphs 8, 9, 10 and 11 on Page 8.

***Auchterarder & District Community Council (419429 - PLAN76); Braes of the Carse Conservation Group (423150 - PLAN21); Councillor Michael A Barnacle (450613 - PLAN812); D G Coutts Associates for Linlathen Developments (346407); Kinross-shire Civic Trust (546838); Loch Lomond and The Trossachs National Park Authority (442806 - PLAN101); Methven & District Community Council (450585 - PLAN862); PPCA Limited for Alfred Stewart Properties Limited (349010 - PLAN15); Scottish Enterprise (344939 - PLAN423); and Tactran Regional Transport Partnership (441235 - PLAN94)*** have all indicated support for Policy 1.

***Colliers International for Gleneagles Hotel (337727)*** have indicated support for text beginning below Tier colour key "Local Development Plans may also provide for some development in settlements that are not defined as principal settlements and in rural areas where this can be accommodated and supported by the settlement, and where it genuinely contributes to the objectives of this Plan, and meets specific local needs or supports regeneration of the local economy".

***Colliers International for Persimmon Homes Limited (416017 – PLAN41); Inchtute Area Community Council (445299); Montagu Evans LLP for Wallace Land Investment Management (343111); Montgomery Forgan Associates for VGH (VICO Limited/Bett Homes/Headon Developments Limited) (349134); and SEStran Regional Transport Partnership (547388)*** support the prioritisation for land release within core areas and principal settlements ahead of land elsewhere, whilst ***Montgomery Forgan Associates for VGH (VICO Limited/Bett Homes/Headon Developments Limited) (349134)*** also indicate their support for Cupar being identified as a Tier 2 Settlement.

***EMAC Planning (for A & J Stephen Limited (445201 - PLAN683); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN731); Angus Estates Limited (445204 - PLAN599); Bett Homes Limited (548523 - PLAN760); J G Lang & Son (445206 - PLAN535); M Batchelor (K) (548301 - PLAN518); Mr R Watson (445205 - PLAN509); and Stewart Milne Homes (548524 - PLAN777)*** support the identification of Dundee and Perth Core Areas as Tier 1 Settlements, together with the identification of Strategic Development Areas within Tier 2.

***Montagu Evans (444081)*** support for statement that there is no requirement for any new settlements.

***Montgomery Forgan Associates for Strategic Land (Scotland) Limited (442083); and Montgomery Forgan Associates for Taylor Wimpey (331497)*** support for supporting text on Page 8 and Page 9 Policy 1, Parts A & B.

***Scottish Environmental Protection Agency (442031)*** support reference to Strategic Flood Risk Assessment and Habitats Regulations Appraisal.

## **DUNDEE CORE AREA**

**EMAC Planning (for A & J Stephen Limited (445201 - PLAN690); Bett Homes Limited (548523 - PLAN761)); Stewart Milne Homes (539251 - PLAN323)** support the inclusion of Tayport, Newport and Wormit within the Dundee Core Area.

**Montgomery Forgan Associates for Strategic Land (Scotland) Limited (442083 - PLAN277)** support Policy 1, Part A, including the Dundee Core Area which includes peripheral settlements Muirhead and Birkhill.

**Montgomery Forgan Associates for Taylor Wimpey (331497)** support Tier 1, including the Dundee Core Area.

**Muir Smith Evans for Muir Homes Limited (548051)** support the identification of Muirhead as a potential area for housing development within the Dundee Core Area.

## **PERTH CORE AREA**

**Montgomery Forgan Associates for Morris Leslie Group (445161)** support the Perth Core Area as a Tier 1 Settlement, in-particular the inclusion of Perth Airport within the Core Area.

**Savills for John Dewar Lamberkin Trust and Needhill LLP (548335)** support Policy 1, in-particular the focus for development within the Perth Core Area.

**Smiths Gore for Mansfield Estates (442870)** support Policy 1, including the identification of Scone within the Perth Core Area.

## **ST. ANDREWS**

**Hargest Planning Limited (548948 - PLAN856)** support St. Andrews being identified as a Tier 2 Settlement.

**Ryden for University of St. Andrews (548506)** support for Page 8, paragraph 5 and Page 9, paragraph 3.

## **OTHER SETTLEMENTS**

**Colliers International for Persimmon Homes Limited (416017 - PLAN38)** support the identification of Kinross as a principal settlement, whilst **Colliers International (for Taylor Wimpey East Scotland (541886 - PLAN61); and Taylor Wimpey East Scotland (541886 - PLAN64))** support the identification of Crieff as a principal settlement.

**DPP LLP for Kinross Estate Company (548029)** support the inclusion of Kinross / Milnathort as a Tier 2 Settlement and the recognition that this location has the potential to make a major contribution to the regional economy and will accommodate a share of the region's additional development.

**DTZ for Headon Developments (548113)** support Policy 1, including the identification of Leuchars / Guardbridge as a Tier 3 Settlement.

**Dunning Community Council (379723)** note that Auchterarder is Tier 3 Settlement and have indicated that they reserve their right to object to any further development within Auchterarder.

**Emac Planning for L Porter (548383 - PLAN548)** support Arbroath being identified as a Tier

2 Settlement.

**Kingsbarns Community Council (263542)** support Policy 1, in-particular that the East Neuk of Fife should remain undeveloped beyond its present level.

**Largo Area Community Council (450207)** supports the prioritisation of Anstruther as the main focus of Tier 3 developments for the East Neuk of Fife.

**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.

**Auchterhouse Community Council (545593); Karen Clark (for Balmossie Developments Limited and Messrs David Reid Farmers (443893); and, Discovery Homes (346689 - PLAN542)):-**

- *In A. outline map. Please show core areas on a map so that boundaries are clearly defined, e.g. exactly where is the Dundee core northern boundary? These boundaries are far too vague as it is.*

**Colliers International for Gleneagles Hotel (337727):-**

- No specific change identified, although consider that paragraph 7 on Page 8 is misleading and therefore the locations, Pitlochry and St Andrews should be deleted or should include other locations such as Gleneagles. Alternatively, the respondent suggests that all location names should be removed.

**Colliers International for Persimmon Homes Limited (416017):-**

- *Wording to Tier 2, change "accommodate small share" to "accommodate a proportionate share".*

**Emac Planning (for A & J Stephen Limited (445201 - PLAN683); A & J Stephen Limited (445201 - PLAN684); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN731); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN733); Angus Estates Limited (445204 - PLAN599); Bett Homes Limited (548523 - PLAN760); J G Lang & Son (445206 - PLAN535); and Stewart Milne Homes (548524 - PLAN777)):-**

- *The identification of Dundee and Perth Core Areas as Tier 1 settlements is supported, together with the identification of Strategic Development Areas within Tier 2. However, non-Strategic Development Area settlements identified in Tier 2 should be removed together with Tier 3 settlements and the settlement priorities left for the more detailed Local Development Plan's to determine.*

**Emac Planning (for A & J Stephen Limited (445201 - PLAN687); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN735); Angus Estates Limited (445204 – PLAN601); and Bett Homes Limited (548523 - PLAN762)):-**

- *Propose that the development hierarchy be removed from the Plan with all key service settlements other than Dundee and Perth core areas given equal development opportunities where infrastructure provision or investment allows.*

**Emac Planning for L Porter (548383):-**

- *A better approach would be for the development hierarchy to be removed from the TAYplan, with the Proposals 1: Map showing only the strategic growth areas, that is, the Core Areas and Strategic Development Areas. All other key service settlements could be identified for growth through the Local Development Plan process.*

**Andrew McCafferty Associates for GD Strawson and J Farquharson (548151 – PLAN736):-**

- *There are inconsistencies between Proposals 1: Map and the map on page 9 in respect of the "Undeveloped Coast" notation. The broken line is in a different place on the map on page 9 compared with its position on Proposals 1: Map and two different colours have been used i.e. yellow on Proposals 1: Map and green on the map on page 9. Request that the notation "Undeveloped Coast" be removed from Proposals 1: Map and the map on page 9.*

**Homes for Scotland (442882 - PLAN214); and Montagu Evans (444081 – PLAN320):-**

- *Below Tier 1, all settlements should be included without further division.*

**J Khazaka (327210):-**

- *This statement "There will be no need for any new settlements during the lifetime of this Plan." should be removed from the Tayplan Proposed Plan.*

**Montagu Evans (444081):-**

- *Supports the statement within Part A which states that Local Developments Plans may also provide for some development in settlements that are not principle settlements. It is considered that this policy should also state that the land allocated for development should be land that can be brought forward and developed within the plan period.*

**Stewart Milne Homes (539251 - PLAN322):-**

- *Stewart Milne Homes proposes the development hierarchy be removed from the plan with all key service settlements other than Dundee and Perth core areas given equal development opportunities where infrastructure provision or investment allows.*

**Muir Group (450286 - PLAN167):-**

- *Tiers 2 and 3 should be omitted and substituted by a statement to the effect that the balance of development should be distributed amongst the region's remaining settlements in accordance with demand/need within each housing market area.*

**Ryden (for Bon Accord Land Limited / Stewart Milne Homes (330884 - PLAN127); and Bon Accord Land Limited / Stewart Milne Homes (330884 - PLAN128):-**

- *In terms of Part A of Policy 1, too much emphasis is placed on Dundee and Perth as economic drivers. There are other locations, such as Montrose which have the ability to be an economic driver. This should be reflected in the Tayplan.*
- *Objection is made to the settlement hierarchy. An explanation or justification for the categorisation of each settlement in each tier should be provided.*
- *The current classification contradicts itself. If a tier two settlement makes a major contribution to the regional economy, they should be given the opportunity to accommodate a larger share of new development. The identification of land for development should be made on the merits of each settlement, not where it fits in the hierarchy.*

**Mr Ian Fowler (548055 - PLAN386):-**

- *No specific change identified although considers that the Proposed Plan lacks any detailed information on development location or how it will be controlled and that there seems to be a lot of general comments and promises but no fine detail on how the plan will be implemented to reassure the public.*

## DUNDEE CORE AREA

### **Emac Planning for A & J Stephen Limited (445201 - PLAN685):-**

- *There is market demand for development to the north west of Dundee at Birkhill, i.e. as part of the Dundee Core Area. We therefore recognise and welcome the identification of 'Birkhill/Muirhead' as a stated element of the Dundee Core Area and the priority for land release for development within this Tier 1 area.*

### **Karen Clark for Discovery Homes (346689 - PLAN203):-**

- *As a result of the effectiveness issues which have occurred in light of the on going difficult economic climate further consideration related to the range, location and spread of housing allocation within the Dundee area.*

### **Karen Clark for Discovery Homes(346689 - PLAN542):-**

- *Recognition in the Location Priorities of the pressures on the urban fringe areas.*

### **Mr Stewart McKiddie (344874 - PLAN645):-**

- *Newport and Wormit should be deleted from Dundee Core Area.*

### **Stewart Milne Homes (539251 - PLAN313); Stewart Milne Homes (539251 - PLAN314); and Stewart Milne Homes (539251 - PLAN315):-**

- *Stewart Milne Homes propose that the villages of Liff, Ballumbie & Duntrune be included within the Dundee Core Area for inclusion within the City's development boundary.*

### **Stewart Milne Homes (539251 - PLAN319 and PLAN321):-**

- *Stewart Milne Homes propose that a wider cross section of land be identified for development within the Dundee City Core Area to ensure there is an adequate supply of unconstrained developable land that can be effective from the early stages of the plan.*

## PERTH CORE AREA

### **Emac Planning for A & J Stephen Limited (445201 - PLAN692):-**

- *The Perth Core should be amended to cover "an area within approximately 25 minutes travel by local bus from the centre of Perth".*

### **GS Brown Construction (543112 - PLAN84):-**

- *In relation to Perth Core Area the majority of new development is earmarked for the Perth North West Expansion Scheme and Oudenarde which, in different ways, are jeopardised by education and roads infrastructure costs. It is not clear how the plan envisages a solution to these problems.*

### **Jim Farquharson (546432 - PLAN208):-**

- *No specific change identified, although has raised concerns about the justification for further development in Perth when flooding is not only a risk but in fact is a reality, even in mid- summer and notes that there is no record of flooding in the Carse of Gowrie.*

### **Lynne Palmer (443979 - PLAN153):-**

- *Considers that Bridgend should form part of the Perth Core Area. The respondent considers that Bridgend is a congested area in terms of traffic, pollution, housing and land space.*

### **Miss Lynn McGeorge (548414 - PLAN607):-**

- *Object to Luncarty, Stanley, Balbeggie & Perth Airport being included within Perth Core Area.*

**Mr David Dykes (527724 - PLAN481):-**

- Implying that Scone is removed from Perth Core Area.

**Mrs D Jeffrey (548760 - PLAN810):-**

- No specific change identified, although considers that the prospect of building new settlements should not be discounted.

**Ms Joan McEwen Sprunt (548250 - PLAN476):-**

- Perth Core Area should include Carse of Gowrie and Guildtown.

**ST. ANDREWS**

**Hargest Planning Limited (548948):-**

- No specific change identified, although consider that the statement in Policy 1, Part A that there will be no additional strategic development in the foreseeable future beyond the St Andrews Strategic Development Area is inappropriate and inconsistent with information and analysis set out in support of the draft Strategic Development Plan.

**Montgomery Forgan Associates for Headon Developments Limited (349140):-**

- No specific change identified, although have indicated concern about the vague and ambiguous nature of the statement "Beyond the Strategic Development Area in Policy 4 for St Andrews there will be no additional strategic development of this scale in the foreseeable future." and request that the terms and purpose/objective of this part of Policy 1 Part A be clarified and confirmed.

**Mr Howard Greenwell (546652 - PLAN255):-**

- Reword the text "Beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale in the foreseeable future" to say "For St. Andrews there will be no additional strategic development in the foreseeable future"

**Mr Kyffin Roberts (337567); and Royal Burgh of St. Andrews Community Council (453889 - PLAN919):-**

- Change "Tier 2 settlements have the potential to make a major contribution to the regional economy but will accommodate a smaller share of the region's additional development" to "Tier 2 settlements have the potential to make a major contribution to the regional economy but will accommodate a smaller share of the region's additional development both in absolute terms and relative to their size."
- Delete "Beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale in the foreseeable future"
- Change "Beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale in the foreseeable future" to "Beyond the Strategic Development Area in Policy 4 for St. Andrews there will be no additional strategic development of this scale since to do so would cause irreparable damage to the landscape setting of the town."

**Professor Christopher M Steel (547478 - PLAN280):-**

- The designation of St. Andrews as a "second tier" centre of population should be clarified to mean St. Andrews and its hinterland - specifically including Guardbridge and Leuchars. TAYplan evidently incorporates the existing Fife Structure plan which sees St. Andrews as "The economic driver for the whole of Fife". This is a blinkered view unless "greater St Andrews" is envisaged. With the main line rail station at Leuchars, the brownfield site at Guardbridge and the real possibility of commercial development of the former Leuchars air base, it would be foolish in the extreme to neglect the

*immense potential of this specific part of Fife - much more suited to development (industrial, commercial and housing) than central St Andrews.*

**Ryden for University of St Andrews (548506):-**

- *Amend Policy 1, paragraph 4 as it relates to St Andrews as follows: make clear what is meant by "additional strategic development" and clarify on what basis this part of Policy 1 has been included.*

**Sarah Hunt (548386):-**

- *No specific change identified, although considers that there is opportunity to develop at Guardbridge and Leuchars and that St. Andrews should be categorised as a small town.*

**SEStran Regional Transport Partnership (547388 - PLAN272):-**

- *No specific change identified, although consider that it is worth including an additional statement in relation to proposed development in St. Andrews, such as "In developing their Local Plans, the Local Planning Authority should consider the appropriateness of protecting the alignment of the Leuchars to St. Andrews rail line for future use as a transport corridor".*

**Strathkinness Community Council (546153):-**

- *No specific change identified, although have commented in relation to the future use of the base at RAF Leuchars as the Proposed Plan classifies Leuchars / Guardbridge as a Tier 3 settlement in terms of its development role. Concerned about the impact on the communities, especially in relation to housing, schooling, transport and healthcare given the proposed change to RAF Leuchars.*

**OTHER SETTLEMENTS**

**Alyth Community Council (548872):-**

- *No specific change identified, although concerned that as a Tier 3 settlement Alyth appears to be deemed as not requiring development.*

**Barton Willmore for Scotia Homes (443109):-**

- *Remove reference to "small" share and insert "but will accommodate a share of the region's additional development."*

**Colliers International (for Persimmon Homes Limited (416017); and Colliers International for Taylor Wimpey East Scotland (541486)):-**

- *Wording to Tier 2, change "accommodate small share" to "accommodate a proportionate share".*

**Dundas Estates & Development Company (548117):-**

- *The proposed settlement Tiers should be abandoned below Tier 1 or amended to remove the outlying villages around Perth and Dundee from Tier 1 status.*
- *The status of Cupar should be better reflected within Policy 1. We agree that Cupar has the potential to make a major contribution to the regional economy, but contrary to Policy 1 as currently drafted, we would suggest that Cupar is capable of accommodating a large share of the region's additional development.*

**Emac Planning for J G Lang & Son (445206 - PLAN539):-**

- *It is considered that the TAYplan should adopt a strategy for growth which is sufficiently flexible to enable settlements, such as Springfield, to be considered for growth in the forthcoming Local Development Plan.*

**Emac Planning for James Keiller Estates (445203):-**

- TAYplan should support additional land releases to the north of Dundee along the A90 corridor at Inveraldie. It is suggested that the TAYplan identifies Inveraldie as a Principal Settlement, or alternatively, if the TAYplan removes Tiers 2 (Non-Strategic Development Areas) and Tier 3 settlements from Proposals 1:Map, TAYplan encourages support for the identification of Inveraldie as a Principal Settlement in the Local Development Plan.

**Emac Planning (for M Batchelor (K) (548301); and EMAC Planning for Mr R Watson (445205 - PLAN509)):-**

- The identification of Dundee and Perth core areas as Tier 1 settlements is supported, together with the identification of Strategic Development Areas within Tier 2. However, non-SDA settlements identified in Tier 2 should be removed together with Tier 3 settlements (option a). Alternatively, if the identification of other settlements in Tier 2 and 3 remains unchanged, Friockheim and Newbigging should be identified in Tier 3 of the hierarchy (option b).

**EMAC Planning for Mr W Robertson (445207):-**

- Under Category B. insert at the end "...in urban and rural locations. The regeneration of Crail Airfield, as a rural brownfield site will be prioritised for redevelopment."

**Andrew McCafferty Associates for GD Strawson and J Farquharson (548151 - PLAN445):-**

- Request the inclusion of a new category in Part A between Tier 1 and Tier 2 and that is a new settlement at Horn Grange.

**GS Brown Construction (543112 – PLAN87):-**

- No specific change identified, although concerned that the plan is too heavily skewed towards development taking place in major settlements, thereby preventing natural growth and development of some of the smaller settlements, such as those in the Carse of Gowrie.

**GVA Grimley for David Wilson Homes (547268 - PLAN448):-**

- Encouragement should be given on the periphery of the principal settlements for appropriate greenfield land release on effective sites. This is necessary to ensure that housing requirements and growth targets are met in the principal settlements.

**Montagu Evans (444081):-**

- There is a disproportionate concentration of development, strategically focused within Dundee and Perth population centres. It is considered that further recognition for residential development should be given to the southern corridor of the TAYplan area.

**Mr Ken Miles (548486 - PLAN831):-**

- Reallocate Kinross/Milnathort to Tier 3 developments.

**Muir Smith Evans (for Muir Homes Limited (548051 - PLAN388); and Muir Homes Limited (548051 - PLAN406)):-**

- The classification of Auchterarder as a Tier 3 settlement is not appropriate.
- The classification should be revised to Tier 2.

**Roscco Properties (442290 - PLAN162):-**

- Auchterarder and surrounding settlements including Dunning should be tier 2, not tier 3.

**Smiths Gore for Errol Park Estate (442871 - PLAN628):-**

- Errol should also be identified on the associated plan as a tier 3 settlement.

**Stewart Milne Homes (539251 - PLAN312); Stewart Milne Homes (539251 - PLAN317):-**

- The development hierarchy be removed from the Plan with all key service settlements other than Dundee and Perth core areas given equal development opportunities where infrastructure provision or investment allows. If TAYplan seeks to retain the development hierarchy, Stewart Milne Homes proposes that Auchterarder and Carnoustie are categorised as a tier 2 settlement.

**Stewart Milne Homes (539251 - PLAN345):-**

- Stewart Milne Homes propose the following settlements for inclusion as the Region's principle Settlements and Land Allocations for Home Building and in support of Employment Generation at Liff; Carnoustie; Duntrune / Ballumbie; Taybridgehead; Dundee City; Perth West; Auchterarder; Crieff; Burrelton and Blairgowrie; Gauldry; and Strathkinness.

**TMS Planning (for Muir Homes Limited (346675 - PLAN354); and TMS Planning for Muir Homes Limited (346675 - PLAN355)):-**

- Within the Proposed Plan details of the specific roles of the "principal settlements" and the rationale for this status (particularly for the Tier 3 settlements) should be clearly set out - why settlements were selected for this status. The rationale for rejecting other similarly sized settlements/those with similar characteristics and facilities from this elevated policy status (e.g. not considering these to be principal settlements) should also be clearly set out, towns such as Auchtermuchty. In the absence of appropriate justification, particularly in light of the enhanced policy status, Newburgh should be deleted as a Tier 3 principal settlement. In addition, in light of its gateway location on the main A91, and its present and potential function as a service centre, the town of Auchtermuchty should be identified as a Tier 3 principal settlement. Even if the latter is rejected, TAYplan should identify the important contributions of settlements, such as Auchtermuchty, and the potential for further development in this and similar settlements in order to positively contribute towards meeting the needs of TAYplan.

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

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

### **GENERAL**

**Auchterhouse Community Council (545593); Karen Clark (for Balmossie Developments Limited and Messrs David Reid Farmers (443893); and, Discovery Homes (346689 - PLAN542)):-** Emerging Local Development Plan's will define settlement boundaries or in the case of Dundee City Council areas for different land uses including recreation and open space. In relation to housing, Policy 1 should be read in conjunction with Policy 5 of the Proposed Plan (Page 17) which focuses the vast majority of Dundee Core Area housing within the Dundee City Council administrative area. The Local Development Plan process will determine which locations within the Core Areas are the most appropriate for which types of land use.

**Colliers International for Gleneagles Hotel (337727):-** There are numerous examples of where national and international golf competitions are held or other areas important to tourism and not all can be listed. As far as golf is concerned the foreword covers Gleneagles, St. Andrews and Carnoustie, recognising their role as international golf competition venues. This section contextualises the point about tourism and golf by referring to two of the Visit Scotland

'destinations', clearly there are other areas too. No change is considered necessary.

**Colliers International for Persimmon Homes Limited (416017); Emac Planning (for A & J Stephen Limited (445201 - PLAN683); A & J Stephen Limited (445201 - PLAN684); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN731); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN733); Angus Estates Limited (445204 - PLAN599); Bett Homes Limited (548523 - PLAN760); J G Lang & Son (445206 - PLAN535); Stewart Milne Homes (548524 - PLAN777); A & J Stephen Limited (445201 - PLAN687); A & J Stephen Limited / Bett Homes Limited (548522 - PLAN735); Angus Estates Limited (445204 - PLAN601); Bett Homes Limited (548523 - PLAN762); L Porter (548383); Homes for Scotland (442882 - PLAN214)); Montagu Evans (444081 - PLAN320); Stewart Milne Homes (539251 - PLAN322); Muir Group (450286 - PLAN167); Ryden for Bon Accord Land Limited / Stewart Milne Homes (330884 - PLAN127 and PLAN128); Barton Willmore for Scotia Homes (443109); Colliers International (for Persimmon Homes Limited (416017); Taylor Wimpey East Scotland (541486)); and Dundas Estates & Development Company (548117):-** The above respondents consider that there is either too much emphasis placed on Dundee and Perth and that the settlement categorisation is unjustified, contradictory and should be removed from the Proposed Plan. The settlement hierarchy is designed to focus the majority of the region's development in principal settlements. These are the largest concentrations of people, jobs, services and facilities. Topic Paper 6: Spatial Strategy (Page 3, Paragraph 3.4) (CL/Doc35) explains that the principal settlements were divided into three tiers to reflect their different scales, roles and functions, now and in the future. Concentrating development in these settlements is seen as the best way to ensure that people, business, jobs, services and facilities are all close together offering increased access and opportunities. This is central to meeting the vision and objectives including the need to travel, reduce carbon emissions, reinvest in existing communities and support sustainable economic growth. Dundee and Perth Core Areas are the largest concentrations of people, jobs, services and facilities. They are and will continue to be the major drivers for the regional economy. However, other settlements and localities will also drive the economy individually or collectively. Tier 2 recognises that other smaller principal settlements will also play a major role in the economy but that this is unlikely to be similar in scale to tier 1. The scale of development will also differ as tier 2 settlements accommodate a smaller scale of additional development than tier 1 settlements. Using Montrose Port and St Andrews University as examples, both are within tier 2 settlements and have the potential to increase their economic presence. However, both facilities already exist and the scale of additional development may not necessarily be large because the economic strength will be partly driven by how these existing facilities are used. The subsequent identification of development land is for Local Development Plans based on the merits of that land within the context of the strategy. There may be circumstances where some land is allocated within and some on the edges of a principal settlement but it will be for the Local Development Plan to determine if this is the most appropriate outcome. It would be contradictory to a strategy with these objectives to prioritise development in other locations ahead of development within principal settlements. The tiers are considered the best way to appropriately distinguish between the similarities and differences of the principal settlements and how they would be expected to contribute to delivering the objectives of this Plan.

In relation to the request to modify the Tier 2 description from a 'small share of development' to a 'proportionate share of development'. TAYplan consider that this change would suggest some kind of statistical link between the size of the settlement (e.g. Kinross, Crieff and Auchterarder) and the scale of future development. No such statistical relationship is being made in the Proposed Plan, rather a notional relationship between the broad scale and function of the settlement and how it will perform as part of the strategy. It is for the emerging Local Development Plan's to determine the appropriate mix of different types of land use and best scale and distribution of these to fulfil the objectives of the TAYplan strategy whilst also considering local circumstances such as development quality, and, environmental and

infrastructure capacity. This cannot be done through an arbitrary statistical or 'proportionate' relationship based on the present rather than future requirements and issues.

**Andrew McCafferty Associates for GD Strawson and J Farquharson (548151 – PLAN736):-** TAYplan do not consider that the Undeveloped Coast notation should be removed from the Proposed Plan as requested. The notations are indicative only with specific areas/boundaries being established in more detail within the emerging Local Development Plans. Scottish Planning Policy that "Areas which are unsuitable for development will include the isolated coast, which is distant from centres of population and lacks obvious signs of development and is of very significant environmental, cultural and economic value. The special characteristics of the isolated coast should be protected, and there is a presumption against development in these areas" (Scottish Planning Policy, Page 21, Paragraph 102) (CL/Doc2). Policy 1 and associated maps are consistent with Scottish Planning Policy. The Key Agencies, including Scottish Natural Heritage, Scottish Environmental Protection Agency nor the Scottish Government have specified any changes to Policy 1 and have worked in partnership with TAYplan on this.

**J Khazaka (327210):-** TAYplan does not consider that the statement on Page 8 should be deleted as requested by the respondent. The statement refers to there being no need for new settlements during the lifetime of this Plan. The Background Technical Note (Page 123, Paragraph 8.71) (CL/Doc58) explains that there is likely to be sufficient land to accommodate anticipated development within existing settlements over the first 12 years of the Plan. Given this circumstance, and with no defined need for a new settlement, it is most likely that settlement extensions would best reflect the objectives of the settlement strategy within the Proposed Plan. Any change, in the Policy to suggest new settlements would be acceptable would fundamentally undermine the Plan's objectives.

**Montagu Evans (444081):-** Policy 1 sets out the spatial strategy and says where development should and should not go. It focuses the majority of the region's new development within principal settlements. Policy 5 specifies that Local Development Plans should identify a minimum 5 year and work towards a 7 year effective housing land supply by 2015 to support economic growth. TAYplan do not consider that an additional statement is therefore required within Policy 1 of the Proposed Plan as requested by the respondent, as the emerging Local Development Plans will be required to allocate land within each Housing Market Area in order to provide for an effective and generous supply of housing land as required by Scottish Planning Policy (Page 14, Paragraph 70) (CL/Doc2). In addition, if the additional statement was included and be repetitive in other policy areas, a short, concise and visionary Strategic Development Plan would not be possible (Planning Circular 1/2009: Development Planning, Page 4, Paragraph 14) (CL/Doc29).

**Mr Ian Fowler (548055):-** The issues raised by the respondent are not of strategic significance. Development locations and the specific locational policy framework will be established by the emerging Local Development Plans. The Proposed Strategic Development Plan does not require to repeat this detail. If it did so, and be repetitive in other policy areas, a short, concise and visionary Strategic Development Plan would not be possible (Planning Circular 1/2009: Development Planning, Page 4, Paragraph 14) (CL/Doc29).

### **DUNDEE CORE AREA**

**Emac Planning for A & J Stephen Limited (445201 - PLAN685); Karen Clark (for Discovery Homes (346689 - PLAN203); Discovery Homes(346689 - PLAN542)); Mr Stewart McKiddie (344874 - PLAN645); Stewart Milne Homes (539251 - PLAN313, PLAN314 and PLAN315); and Stewart Milne Homes (539251 - PLAN319 and PLAN321):-** The settlement hierarchy is designed to focus the majority of the region's development in principal settlements. Topic Paper 6: Spatial Strategy (CL/Doc35) explains that the principal

settlements were divided into three tiers to reflect their different scales, roles and functions, now and in the future. Concentrating development in these settlements is seen as the best way to ensure that people, business, jobs, services and facilities are all close together offering increased access and opportunities (Page 3, Paragraph 3.4) This is central to meeting the vision and objectives including the need to travel, reduce carbon emissions, reinvest in existing communities and support sustainable economic growth. Dundee and Perth Core Areas are the largest concentrations of people, jobs, services and facilities. They are and will continue to be the major drivers for the regional economy.

The arguments put forward by **Mr Stewart McKiddie (344874 - PLAN645)** and **Stewart Milne Homes (539251 - PLAN313, PLAN314 and PLAN315)** for the deletion and inclusion of other settlement(s) from the Dundee Core Area do not persuade TAYplan that amendments should be made to the Proposed Plan. This is because the settlements at Liff and Ballumbie/Duntrune are small and consequently do not accommodate the scale of population, jobs, services or facilities of a principal settlement and do not fulfil such a role at present. Although a major planning application has been submitted by **Stewart Milne Homes (539251)** for residential and golf course development at Ballumbie this currently pending consideration. There is however no policy intention at present to escalate the scale of development at either Liff or Ballumbie/Duntrune so that it could be considered a principal settlement. Within the Dundee Core Area there are a number of major individual strategic sites, including sites within Wormit, Tayport, Newport as well as Dundee Western Gateway. These sites have already been allocated through approved Structure Plans / Local Plans or have planning permission and these strategic sites will affect the implementation of the Strategic Development Plan during its first 12 years and beyond in some cases (Background Technical Note (2010), Pages 111-112, Paragraphs 8.27-8.28 and 8.32) (CL/Doc58). Adding additional settlement(s) within Policy 1 would compromise the principles of the location priorities established in Policies 1 and 3 and would also contradict the Vision and Objectives of the Proposed Strategic Development Plan.

In relation to the effectiveness issues raised by of the Dundee Western Gateway Strategic Development Area, this is considered in more detail within the following Schedule 4:- Issue Number 14: Strategic Development Areas – Alternative Sites.

A number of respondents, including **Emac Planning for A & J Stephen Limited (445201 - PLAN685)**; **Karen Clark for Discovery Homes(346689 - PLAN542)** and **Stewart Milne Homes (539251 - PLAN319)** consider that additional land release generally within the Dundee Core, on land at Birkhill and on the urban fringes should be considered further. The identification of development land is for emerging Local Development Plans to consider based on the merits of that land within the context of the strategy. There may be circumstances where some land is allocated within and some on the edges of a principal settlement but it will be for the Local Development Plan to determine if this is the most appropriate outcome.

TAYplan consider that a change to the Dundee Core Area would fundamentally alter the Plan's locational strategy. No key agencies or the Scottish Government are seeking a change to Policy 1.

### **PERTH CORE AREA**

**Emac Planning for A & J Stephen Limited (445201 - PLAN692)**; **GS Brown Construction (543112 - PLAN84)**; **Jim Farquharson (546432 - PLAN208)**; **Lynne Palmer (443979 - PLAN153)**; **Miss Lynn McGeorge (548414 - PLAN607)**; **Mr David Dykes (527724 - PLAN481)**; **Mrs D Jeffrey (548760 - PLAN810)**; **Ms Joan McEwen Sprunt (548250 - PLAN476)**:- The above respondents in some cases are seeking the deletion of settlements from the Perth Core Area and in other cases are promoting that additional settlements should be included within the Perth Core Area.

The settlement hierarchy is designed to focus the majority of the region's development in principal settlements. Topic Paper 6: Spatial Strategy (CL/Doc35) explains that the principal settlements were divided into three tiers to reflect their different scales, roles and functions, now and in the future. Concentrating development in these settlements is seen as the best way to ensure that people, business, jobs, services and facilities are all close together offering increased access and opportunities (Page 3, Paragraph 3.4) This is central to meeting the vision and objectives including the need to travel, reduce carbon emissions, reinvest in existing communities and support sustainable economic growth. Dundee and Perth Core Areas are the largest concentrations of people, jobs, services and facilities. They are and will continue to be the major drivers for the regional economy.

In terms of the deletion and inclusion of other settlement(s) from the Perth Core Area, TAYplan is not persuaded to amend the Proposed Plan. Settlements identified within the Perth Core Area already contain a number of major individual strategic sites, including sites at Oudenarde and Almond Valley. These sites have already been allocated by approved Structure Plans / Local Plans or have planning permission. These strategic sites will affect the implementation of the Strategic Development Plan during its first 12 years and beyond in some cases (TAYplan Background Technical Note (2010), Pages 111-112, Paragraphs 8.27-8.28 and 8.33) (CL/Doc58).

In terms of the issue raised by **Lynne Palmer (443979)** regarding the omission of Bridgend, it should be noted that Bridgend is already part of Perth along with other neighbourhoods and is therefore already included within the definition of Perth Core Area. No change is therefore proposed. The inclusion of the Carse of Gowrie suggested by **Jim Farquharson (546432)** and **Ms Joan McEwen Sprunt (548250)** and Guildtown also suggested by **Ms Joan McEwen Sprunt (548250)** within the Perth Core Area are also not considered appropriate as the settlements are small and consequently do not accommodate the scale of population, jobs, services or facilities of a principal settlement and do not fulfil such a role at present. There is also no policy intention at present to escalate the scale of development at the Carse of Gowrie and Guildtown so that it could be considered a principal settlement.

It should also be noted that within the Background Technical Note to the Main Issues Report (April 2010) (CL/Doc58), TAYplan considered a Spatial Strategy which would have focused development along the region's main transport corridors. This would have included land at the Carse of Gowrie. Such a spatial strategy was considered unreasonable and unrealistic given the reliance on travel to access jobs, services and facilities which would be inconsistent with Scottish Planning Policy (Background Technical Note (2010), Pages 118-119, Paragraphs 8.52-8.55) (CL/Doc58). The majority of Main Issues Report respondents preferred the strategy of concentrating growth in Core Areas (Topic Paper 6: Spatial Strategy, Page 4) (CL/Doc35).

In relation to comments regarding flooding (**Jim Farquharson (546432)**) and potential infrastructure constraints with the proposed Strategic Development Areas (**GS Brown Construction (543112 - PLAN84 and PLAN87)**) TAYplan previously carried out an exercise to understand the key environmental and infrastructure issues presented by the strategic sites. The assessments aimed to understand what infrastructure support exists and what improvements may be needed. (Background Technical Note (2010), Pages 113, Paragraphs 8.35 and Pages 125-134, Annexe A) (CL/Doc58). In addition, the Background Technical Note (2010) (Page 121, Paragraph 8.65) indicates that "the Strategic Environmental Assessment concludes that substantial parts of the Carse of Gowrie are already at medium to high flood risk which could increase with sea level rise. Although Perth City Centre and some sites along the Tay and Almond experience high flood risk there are already some defences and the critical mass of development and economic interest to make further defence measures comparatively viable. Locating a greater share of development in the Carse of Gowrie, would place more households in locations of increasing flood risk with less likelihood of protection from defences." TAYplan considers that these matters can be addressed and mitigated

satisfactorily through the emerging Perth & Kinross Local Development Plan or through the planning application process. Neither Scottish Environmental Protection Agency, Scottish Natural Heritage nor the Scottish Government have raised any issues regarding flooding or other potential infrastructure constraints and have sought no changes to Policy 1.

TAYplan consider that a change to the Perth Core Area would fundamentally alter the Plan's locational strategy. No key agencies or the Scottish Government are seeking a change to Policy 1.

## **ST. ANDREWS**

**Hargest Planning Limited (548948); Montgomery Forgan Associates for Headon Developments Limited (349140); Mr Howard Greenwell (546652):- Mr Kyffin Roberts (337567); Royal Burgh of St. Andrews Community Council (453889 - PLAN919) and Ryden for University of St. Andrews (548506):-** TAYplan does not consider that any modification or additional information is required in relation to Policy 1, Part A as it relates to St. Andrews. The recently approved Fife Structure Plan (2009) (CL/Doc39) has already carried out an exercise to identify and consider the implications of strategic sites, including St. Andrews (Background Technical Note (2010), Page 112, Paragraph 8.31) (CL/Doc58). The paragraph within Policy 1 regarding St. Andrews is included in order to protect the setting of the town and the views in and out of its historic core. Smaller scale development within the town's boundary will be for the emerging Local Development Plan to consider (Topic Paper 6: Spatial Strategy, Page 7, Paragraph 5.13) (CL/Doc35). This approach is also compatible with Policy 3 (Greenbelts).

**Mr Kyffin Roberts (337567); Royal Burgh of St. Andrews Community Council (453889 - PLAN919) Professor Christopher M Steel (547478); Sarah Hunt (548386); and SEStran (547388);** Tier 2 Settlements accommodate some of the TAYplan area new development but at a much smaller scale than the Tier 1 settlements. They are differentiated from Tier 3 because their present roles as service centres, particularly retail and their potential economic significance are important in regional terms, for example the tourism and research potential of St Andrews. The strategy of the Proposed Plan allows for some development in these areas to support their present roles, recognising that their continued use and improvements will contribute significantly to the regional economy. However, beyond the strategic sites outlined in Policy 4 of the Proposed Plan (Page 15) Tier 2 settlements accommodate a smaller share of the new development of the TAYplan area and would be unlikely to accommodate additional strategic scale development. Beyond existing proposals in and around St. Andrews, development pressures would be directed away from St. Andrews (Background Technical Note (2010), Page 115, Paragraphs 8.39) (CL/Doc58).

Leuchars/Guardbridge were included as Tier 3 Settlements within the Proposed Plan given the anticipated regeneration of the former paper mill in Guardbridge which will concentrate a scale and function of development in the settlements which reflects the intended role of Tier 3 Settlements. In addition, their position on the national rail network better describes the role of Leuchars/Guardbridge in the future (Topic Paper 6: Spatial Strategy, Page 7, Paragraph 5.10) (CL/Doc35). There is no requirement to merge St. Andrews with Leuchars/Guardbridge.

The comments by **Strathkinness Community Council (546153)** relate to the recent announcement by the Secretary of State for Defence, the Rt Hon Dr Liam Fox MP (CL/Doc64) to the House of Commons that RAF Leuchars would close as an RAF station 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. Given the proposed, modest increase in personnel anticipated, TAYplan does not consider that a change is required from Leuchars/Guardbridge as a Tier 3 Settlement within the Proposed Plan.

**SEStran (547388);** TAYplan does not consider that an additional statement is required in relation to protecting the alignment of the Leuchars to St. Andrews rail line as requested by the respondent. This issue is considered further under Schedule 4 Issue Number 2: Proposals 1 Map.

### **OTHER SETTLEMENTS**

**Alyth Community Council (548872):-** TAYplan does not agree with the respondents view regarding development within Alyth. As a Tier 3 Settlement Alyth is considered to have the potential to play an important but modest role in the regional economy and will accommodate a small share of the region's additional development which is more about sustaining them. Ultimately, the emerging Perth & Kinross Local Development Plan will determine the scope, scale and location of future land allocations within the town.

**Emac Planning (for J G Lang & Son (445206 - PLAN539); James Keiller Estates (445203); M Batchelor (K) (548301); Mr W Robertson (445207); and Mr R Watson (445205 - PLAN509)); Andrew McCafferty Associates for GD Strawson and J Farquharson (548151 - PLAN445); Montagu Evans (444081); Smiths Gore for Errol Park Estate (442871 - PLAN628); Stewart Milne Homes (539251 - PLAN345); TMS Planning (for Muir Homes Limited (346675 - PLAN354); and TMS Planning for Muir Homes Limited (346675 - PLAN355)):-** The above respondents all consider that additional settlements, across the TAYplan should be included as principal settlements within Policy 1, although it should be noted that a number of settlements listed by **Stewart Milne Homes (539251 - PLAN345)** are already included as principle settlements. Notwithstanding this, the arguments put forward by the respondents for the inclusion of other settlement(s) do not persuade TAYplan that amendments should be made to the Proposed Plan. This is because the settlements are small and consequently do not accommodate the scale of population, jobs, services or facilities of a principal settlement and do not fulfil such a role at present. There is also no policy intention at present to escalate the scale of development within these settlements so that they could be considered a principal settlement. Topic Paper 6: Spatial Strategy (CL/Doc35) explains that the principal settlements were divided into three tiers to reflect their different scales, roles and functions, now and in the future. Concentrating development in these settlements is seen as the best way to ensure that people, business, jobs, services and facilities are all close together offering increased access and opportunities (Page 3, Paragraph 3.4). Adding additional settlement(s) within Policy 1 would compromise the principles of the location priorities established in Policies 1 and 3 and would also contradict the Vision and Objectives of the Proposed Strategic Development Plan.

In relation to the points made by **TMS Planning (for Muir Homes Limited (346675 - PLAN354); and Muir Homes Limited (346675 - PLAN355)** regarding the Proposed Plan providing rationale for the status of principal settlements, this background information is provided in the Background Technical Note (2010) (Pages 114-116, Paragraphs 8.37-8.43) (CL/Doc58). The Proposed Plan does not require to repeat this detail. If it did so, and be repetitive in other policy areas, a short, concise and visionary Strategic Development Plan would not be possible (Planning Circular 1/2009: Development Planning, Page 4, Paragraph 14) (CL/Doc29).

**Dundas Estates & Development Company (548117); Mr Ken Miles (548486 - PLAN831); Muir Smith Evans (for Muir Homes Limited (548051 - PLAN388); Muir Homes Limited (548051 - PLAN406)); and Rossco Properties (442290 - PLAN162):-** The above respondents consider that a number of the principal settlements identified within Policy 1 should be re-categorised into a different tier. The Proposed Plan has identified a series of the region's principal settlements as the focus for additional development. These settlements are already the largest concentrations of population, jobs, services and facilities. They are also most able to accommodate additional growth. The settlements are divided into three tiers

which distinguish between the scale of growth to be accommodated, these reflect the varying scales of size and significance of these principal settlements. This approach does not preclude development elsewhere but ensures that the majority is in locations which will reflect the vision and objectives.

All settlements are deemed to be in the correct tier and the evidence provided does not persuade TAYplan that the Proposed Plan should be amended. In some instances it may be that the development suggested may take place irrespective of which tier the settlement appears in but the critical factor is that the tiers distinguish between the relative differences between the types of settlements whilst realising that all are principal settlements as the main providers of services etc.

Tier 3 settlements provide a range of jobs, services and facilities for themselves and their surroundings. Their role in the Plan will be to continue to do this and ensure that they continue to be the hub for activity in their area, accepting that as settlements they are generally smaller in scale than those identified in tier 2 and will play a less substantial role in the regional economy than those in tier 2.

**GVA Grimley for David Wilson Homes (547268):-** Policy 1, Part B specifically deals with the issue of development priorities. The respondent considers that development on the periphery of principal settlements should be encouraged, however the Proposed Plan clearly specifies that following land within principal settlements, land on the edge of principal settlements would then be under consideration. Emerging Local Development Plans will allocate appropriate land taking into account the development priorities established within the Strategic Development Plan. TAYplan does not consider that this detail needs to be repeated within Policy 1, Part A. If it did so, and be repetitive in other policy areas, a short, concise and visionary Strategic Development Plan would not be possible (Planning Circular 1/2009: Development Planning, Page 4, Paragraph 14) (CL/Doc29).

## **RESPONSES TO REPRESENTATIONS SUPPORTING AS WRITTEN**

TAYplan welcomes the support for these issues.

## **CONCLUSION**

Policy 1 accords fully with Scottish Planning Policy (Page 7, Paragraph 38) in respect of the location of new development and Circular 1/2009: Development Planning (Page 4, Paragraphs 13-14) regarding the requirement for Strategic Development Plan's to contain a spatial strategy for future development. 55% of respondents at the Main Issues stage supported the preferred strategy, whilst 14% preferred the alternative strategy. 49% of respondents agreed with the settlements identified as the region's principal settlements (Main Issues Report (2010), Pages 40-48) and (Topic Paper 6: Spatial Strategy, Page 4). TAYplan considers that the issues raised do 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. No Key Agencies, including the Scottish Government have sought any changes to Policy 1. TAYplan consider that any modifications to Policy 1 could have fundamental implications on delivering the vision and objectives of the Proposed Plan.

### **Reporter's conclusions:**

[Note: For DPEA use only.]

### **Reporter's recommendations:**

[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**