

TAYplan Strategic Development Plan Authority

Summary of Unresolved Issues (Schedule 4)

Issue Number 7: Managing TAYplan's Assets – Employment Land

Contents

1. Summary of Unresolved Issues

2. Copy of actual representations pertinent to this issue (*Personal details have been redacted. Full details have been provided to the DPEA separately.*)

- All representations include any attachments submitted by the respondent.
- 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.

3. Library of documents

- 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).

1. Summary of Unresolved Issues

Issue		
Issue Number 7: Managing TAYplan's Assets – Employment Land		
Development plan reference:	Page 12: Managing TAYplan's Assets Supporting Text Page 13: Policy 3 Employment Land	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue and representation references		
Seeking a change		
ID Number	Person / Organisation	Representation Reference
445201	Emac Planning for A & J Stephen Limited	PLAN696
445201	Emac Planning for A & J Stephen Limited	PLAN697
548522	Emac Planning for A & J Stephen Limited / Bett Homes Limited	PLAN740
548522	Emac Planning for A & J Stephen Limited / Bett Homes Limited	PLAN741
445204	Emac Planning for Angus Estates Limited	PLAN605
445204	Emac Planning for Angus Estates Limited	PLAN609
548523	Emac Planning for Bett Homes Limited	PLAN764
548523	Emac Planning for Bett Homes Limited	PLAN765
445203	Emac Planning for James Keiller Estates Limited	PLAN717
548524	Emac Planning for Stewart Milne Homes	PLAN780
548524	Emac Planning for Stewart Milne Homes	PLAN781
343111	Montagu Evans LLP for Wallace Land Investment Management	PLAN330
453889	Royal Burgh of St. Andrews Community Council	PLAN921
444087	Scottish Property Federation	PLAN248
Support as written		
ID Number	Person / Organisation	Representation Reference
337727	Colliers International for Gleneagles Hotel	PLAN56
547927	Savills for John Dewar Lamberkin Trust and Needhill LLP	PLAN651
Provision of the development plan to which the issue relates:	Employment Land – this Schedule 4 relates to the three bullet points under the Employment Land section of Policy 3.	

SUMMARY OF REPRESENTATIONS SEEKING A CHANGE

Royal Burgh of St. Andrews Community Council (453889) have requested two separate modifications to the text within Policy 3. Firstly, the respondent is seeking a modification to the first bullet point as it is considered that the 'five years supply' of employment land appears to be undefined and does not appear to have a basis within Scottish Planning Policy. The respondent also considers that the quantities of land designated for employment purposes should not be grossly disproportionate to historical demand.

Secondly, the respondent is seeking a modification to the second bullet point to avoid housing land being wasted by being allocated as a Class 4 Use and subsequently lying undeveloped.

Scottish Property Federation (444087) agrees with the proposals to support economic growth in the region and the identification and safeguarding of a five year supply of employment land. Notwithstanding this, the respondent as well as **Emac Planning (for A & J Stephen Limited (445201 – PLAN696), A & J Stephen Limited / Bett Homes Limited (548522 – PLAN740), Angus Estates Limited (445204 – PLAN605), Bett Homes Limited (548523 – PLAN764), James Keiller Estates Limited (445203 – PLAN717) and Stewart Milne Homes (548524 – PLAN780))** have suggested that a seven year supply of employment land should be identified within the cities as it is considered that a healthier supply of employment land, particularly within the cities will facilitate the requirement in Scottish Planning Policy that the five year supply should be serviced and marketable. In addition, allocations should be identified by a site selection process with appropriate criteria added to aid the transparency of the process, whilst unrealistic allocations should be avoided. Allocations should only be made in areas where the market wants to invest.

Emac Planning (for A & J Stephen Limited (445201 – PLAN697), A & J Stephen Limited / Bett Homes Limited (548522 – PLAN741), Angus Estates Limited (445204 – PLAN609), Bett Homes Limited (548523 – PLAN765), James Keiller Estates Limited (445203 – PLAN717) and Stewart Milne Homes (548524 – PLAN781)) have requested that an additional, fourth, bullet point is included under the employment land section of Policy 3. It is considered that new employment land is required across the region, not just within principal settlements to ensure sustainable mixed-use communities and to further support economic diversification. The respondents also consider that Local Development Plans are in the best position to allocate employment land in areas of need and where there is a demonstrable market-led interest.

Montagu Evans LLP for Wallace Land Investment Management (343111) note that Scottish Planning Policy states that Strategic Development Plans should identify an appropriate range of business locations, including mixed developments, business parks, science parks, medium and large industrial sites and high amenity business locations. It is therefore considered that the importance of maintaining support for sites such as 'T in the Park' should be highlighted in the Proposed Strategic Development Plan as these sites provide an opportunity to improve and expand economic development locally. This is particularly relevant given Kinross is identified as a Tier 2 Settlement where an element of growth is expected across the TAYplan area and given the location of Junction 6 of the M90 which could contribute significantly to economic development opportunity for a variety of uses.

SUMMARY OF REPRESENTATIONS SUPPORTING AS WRITTEN

Colliers International for Gleneagles Hotel (337727) support the third bullet point under the Employment Land section of Policy 3, in particular the respondent is encouraged to note TAYplan's emphasis on employment land also relates to tourism as well as industrial land uses.

Savills for John Dewar Lamberkin Trust and Needhill LLP (547927) note that there is a shortage of prestige business land in the Perth area, however the respondent supports Policy 3 as it recognises the need for at least five years supply of employment land whilst safeguarding Class 4 office type uses within principal settlements.

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.

Emac Planning (for A & J Stephen Limited (445201 – PLAN696); A & J Stephen Limited / Bett Homes Limited (548522 – PLAN740); Angus Estates Limited (445204 – PLAN605); Bett Homes Limited (548523 – PLAN764); James Keiller Estates Limited (445203); Stewart Milne Homes (548524 – PLAN780)); and Scottish Property Federation (444087):-

- *On Employment Land, bullet 1, insert after "principal settlements" and "at least 7 years supply of employment land within the cities of Dundee and Perth".*

Emac Planning (for A & J Stephen Limited (45201 – PLAN697); A & J Stephen Limited / Bett Homes Limited (548522 – PLAN741); Angus Estates Limited (445204 – PLAN609); Bett Homes Limited (548523 – PLAN765); James Keiller Estates Limited (445203); and Stewart Milne Homes (548524 – PLAN781):-

- *On Employment Land insert fourth bullet to state:
"Identifying employment land outwith the principal settlements, as an integral approach, to achieving sustainable mixed use communities."*

Montagu Evans LLP for Wallace Land Investment Management (343111):-

- *Reflecting our earlier submissions to the Main Issues Report, the distinctions of the various centres across the area are noted. Each centre plays an important role in providing a range of services, which should be acknowledged within the plan. Economic development, and its sustained promotion is critical within the TAYplan area to maintain and support equitable growth. Our client owns land at Kinross including that which hosts, in part, 'T in the Park'. The festival is a significant attractor, supporting the local and wider TAYplan economy. The importance of tourism, culture and major events, such as 'T in the Park', is acknowledged in the plan and recognised within it as being one of a number of key sectors of the Scottish economy with the potential to grow disproportionately.*

Royal Burgh of St. Andrews Community Council (453889):-

- *Page 13, Policy 3, Employment Land
Change "identifying and safeguarding at least 5 years supply of employment land within principal settlements" to "identifying and safeguarding an appropriate supply of employment land in the light of historical demand within principal settlements".*
- *Page 13, Policy 3, Employment Land
Change "safeguarding areas identified for class 4 office type uses in principal settlements" to "safeguarding areas identified for class 4 office type uses in principal*

settlements proportionate to historic demand".

Summary of responses (including reasons) by Planning Authority:

RESPONSES TO REPRESENTATIONS SEEKING A CHANGE

Emac Planning (for A & J Stephen Limited (445201 – PLAN696); A & J Stephen Limited / Bett Homes Limited (548522 – PLAN740); Angus Estates Limited (445204 – PLAN605); Bett Homes Limited (548523 – PLAN764); Stewart Milne Homes (548524 – PLAN780)); Royal Burgh of St. Andrews Community Council (453889); and Scottish Property Federation (444087):- It is considered that there is no requirement to modify bullet point one as requested by the respondents. Policy 3 – Employment Land states that 'at least 5 years supply of employment land' should be identified and safeguarded which is consistent with the requirements set out in Scottish Planning Policy (Page 9, Paragraph 46) (CL/Doc2).. In addition to the compatibility with Scottish Planning Policy (CL/Doc2)., TAYplan consider that Policy 3 has enough in-built flexibility for individual Local Authorities through their Local Development Plans to identify and safeguard a longer supply of employment land if required.

Topic Paper 2: Growth Strategy (June 2011) (Page 12, Paragraph 5.18) (CL/Doc31). indicates that The Strategic Development Plan could have set out employment land figures to Local Authority level; however work has not been done to justify this and it has not been tested through the Main Issues Report (2010) (CL/Doc38). Employment land dynamics also differ strongly from housing land for example and within the four local authorities the supply of employment land is also variable. The purpose of Policy 3 (Employment Land) is to ensure consistency. An Employment Land Audit was undertaken at the Main Issues Stage (Monitoring Statement, Page 70, Paragraph 6.6). which meets the requirements set out in Scottish Planning Policy (Page 9, Paragraph 46) (CL/Doc2)..

Emac Planning (for A & J Stephen Limited (45201 – PLAN697); A & J Stephen Limited / Bett Homes Limited (548522 – PLAN741); Angus Estates Limited (445204 – PLAN609); Bett Homes Limited (548523 – PLAN765); and Stewart Milne Homes (548524 – PLAN781)):- It is considered that there is no requirement to add an additional bullet point as requested by the respondents. Although Policy 3 does not specifically mention the identification of employment land outwith the principal settlement, Policy 1: Location Priorities, Part A (Page 13) provides opportunity for Local Development Plans to provide employment uses outwith principal settlements where this can be accommodated and supported by the settlement and where it contributes to the objectives of the Strategic Development Plan whilst also meeting local needs or supporting the regeneration of the local economy. This modification would result in duplication within policies of the Proposed Strategic Development Plan and therefore a short, concise and visionary Strategic Development Plan would not be possible (Planning Circular 1/2009: Development Planning, Page 4, Paragraph 14) (CL/Doc29).

Montagu Evans LLP for Wallace Land Investment Management (343111):- Although the importance of major tourism events such as 'T in the Park' is noted and recognised as playing a significant role in enhancing the economy of the area, the specific reference to major events is not considered to be of strategic significance and therefore does not warrant a modification of the Proposed Plan. Whilst 'T in the Park' is a permanent use of the land, many major events are often temporary uses of land and as such a change in the strategic employment land policy is neither necessary nor appropriate. The Main Issues Report (2010) (Page 26) (CL/Doc38) identified major sporting and cultural events such as 'T in the Park' continuing to be major draws for visitors around the globe, however no particular reference was required within the Proposed Strategic Development Plan.

Royal Burgh of St. Andrews Community Council (453889):- The potential loss of employment land was considered to be a key issue which was discussed in the Main Issues Report (2010) (Page 27, Paragraph 5.8) (CL/Doc38). The Main Issues Report indicated that the cumulative loss of employment land to alternative land uses, particularly in rural parts of the region, could affect the provision of business premises and jobs.

Subsequently, TAYplan's Topic Paper 2 'Growth Strategy' (June 2011) (Page 11, Paragraph 5.20) (CL/Doc31) continues this further and states that safeguarding land including existing employment sites is important given the risk that alternative land uses on these or adjacent sites prevent or limit how businesses can use the land. This can, in some circumstances, deprive an area of a range of employment land for a variety of users, including the loss of Class 4 office type uses. Similarly some sites, particularly within principal settlements where there is a greater mix of land-uses could be lost directly to redevelopment for alternative uses. Although the Topic Paper indicates that the impacts of this later circumstance could be significant in rural communities as it could stifle future enterprise by depriving emerging businesses of premises, requiring them instead to acquire land, planning consent and then construct premises the same could also apply to principal settlements.

In addition, Scottish Planning Policy (Page 10, Paragraph 47) (CL/Doc2) also highlights that 'development plans should support small business development and growth and promote opportunities for low impact industrial, business and service uses which can co-exist with housing and other sensitive uses without eroding amenity. The Proposed Plan provides a range and choice of marketable strategic employment land sites, in accordance with Scottish Planning Policy TAYplan consider that the safeguarding of areas identified for Class 4 office type uses in Policy 3 adequately supports business growth and development as required in Scottish Planning Policy (Page 9, Paragraph 46) (CL/Doc2). Accepting the proposed changes would undermine one of the Proposed Plan's key objectives of "supporting" sustainable economic development (Proposed Strategic Development Plan, Page 6).

RESPONSE TO REPRESENTATIONS SUPPORTING AS WRITTEN

TAYplan welcomes the support for these issues.

CONCLUSION

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

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