

Issue:	032:Something Else	
Development plan reference:	Any other issues that do not relate directly to any one policy within the plan, as well as general comments.	Reporter: [DPEA Use only]
Body or person(s) submitting a representation raising the issue representation reference:		
Seeking a change Andrew Dundas (821782) Bryan Wallace for National Grid/Scotia Gas Network (763366) Claudine Scott (907629) Confederation of St Andrews Residents Associations (339848) Coupar Angus & Bendochy Community Council (909949) Freuchie Community Council (910081)	Friends of the Earth Tayside (845935) Quod for Scotia Gas Networks (910286) Royal Burgh of St Andrews Community Council (910325) St Andrews Preservation Trust (910253) Strathkinness Community Council (909092) The Theatres Trust (856633)	Supporting as written SEStran (908118)
Provision of the development plan to which the issue relates:		
Any other issues that do not relate directly to any one policy within the plan, as well as general comments.		
Planning Authority's summary of the representation(s):		
<h2>Summary of Representations Seeking a change</h2> <h3><u>ALLOCATION OF LAND</u></h3> <p>Andrew Dundas (821782) PLAN2015_186 considers planning to be 'a device for the cruel rationing development land, it is the main cause of the astronomic rise in site values'. He considers the system to be dictatorial and only to benefit those landowners whose land is allocated for development. The respondent considers that further land is required and infrastructure is needed to enable development.</p> <h3><u>CONSULTATION PROCESS</u></h3> <p>Claudine Scott (907629) PLAN2015_224 considers the online consultation process to be 'ineffectual'. The respondent had difficulty logging on and that the email address, which is published, did not work and hopes that TAYplan will improve this process in the future.</p> <p>Royal Burgh of St Andrews Community Council (910325) PLAN2015_528 considers the online system "not to be user-friendly" and that the consultation procedure fails to encourage participation from members of the public, and therefore fails to encourage interest and involvement in the Plan itself. The respondent also considers there to be no provision for those without the access to a computer to take part in any aspect of TAYplan. The respondent also considers that those who have 'I.T. skills' will not wish to be involved in this "bureaucratic exercise with its enormous documents as few of which have much attraction for the ordinary person".</p> <p>Confederation of St Andrews Residents Associations (339848) PLAN2015_449 does not consider that the web response forms are user friendly and suggests TAYplan are 'not engaging adequately with the public'. The respondent is specifically concerned about the percentage of landowners and developers who have responded to TAYplan. The respondent also considers that TAYplan is distant from the public and 'seriously dislocated from concerns or aspirations of many non-governmental organisations'. They give St Andrew's green belt as an example, in which they state TAYplan have made virtually no comment on. They compare this with Agricultural Land which they say TAYplan monitor in terms of losses and incursions.</p> <p>The respondent also considers the logos etc. of Dundee City Council on emails do not assist members of other communities to feel that they are valued in relation to responses. The respondent recognises that while it is not a specific requirement of equalities legislation, accessible and understandable processes of consultation are key to the effective engagement of the public in plans which affect them.</p>		

Freuchie Community Council (910081) PLAN2015_297 considers that the website is 'totally user unfriendly' and consider that this contributes to an 'un-democratic process'.

HAZARDOUS SUBSTANCES AND INSTALLATIONS POLICY

Quod for Scotia Gas Networks (910286) PLAN2015_394 promotes the Crieff and Broich Gas Holder sites which will come forward for redevelopment and will not be used for future gas storage. They consider that the decommissioning costs for such sites rule out low value employment uses. They therefore propose any removal of protection for such sites and a new policy for hazardous installations which provides the flexibility for higher value land uses that the respondent considers necessary to offset the anticipated decommissioning costs.

CULTURAL FACILITIES

The Theatres Trust (856633) PLAN2015_522 considers cultural facilities to be an important part of a sustainable community, including facilities such as museums, exhibition halls, live music venues, community halls, libraries and other public venues. The respondent considers that policies which support and enhance cultural facilities and activities can be used as a catalyst for wider cultural development and city regeneration.

They therefore consider it important that the TAYplan support arts and culture at all levels and ensure that all residents and visitors have access to cultural opportunities. They also seek to specifically protect, support and enhance existing leisure and cultural facilities from change of use or redevelopment, unless it can be demonstrated that there is no longer a community need for that facility, as well as providing criteria for encouraging new cultural development of all sizes.

The respondent supports the cultural content of Policy 5 Town Centres First (Doc80), especially with regard to the role of cultural facilities contributing to town centre vibrancy, vitality and viability throughout the day and into the evening. However the respondent considers that the plan should have a policy that aims to specifically safeguard, promote and enhance the existing community and cultural facilities that are important to local communities, or to find alternative community uses when they become no longer viable, before moving onto criteria for new development.

DOCUMENT SUITE

Bryan Wallace for National Grid/Scotia Gas Network (763366) PLAN2015_263 considers there to be a need for a glossary of terms that are included in the Plan.

St Andrews Preservation Trust (910253) PLAN2015_539 considers the documents to be "difficult to penetrate", and feels the separation of the plan and action programme lacks cohesion.

Coupar Angus & Bendochy Community Council (909949) PLAN2015_294 considers the maps in the Proposed Plan (Doc80) are unclear, and considers that town locations and important connecting roads should be clearly indicated.

Confederation of St Andrews Residents Associations (339848) PLAN2015_449 considers there to be 'generalised inspirational statements' about the quality of life for residents and about place making in the TAYplan area, which are 'so generalised and non-specific that they could be interpreted in a dozen different ways and produce a dozen different outcomes'. The respondent considers this would have no significant improvement on individual lives.

The respondent also considers that the Proposed Plan could be improved by setting down targets for issues as 'travel times to education establishments and recreational facilities for adults.

The respondent is also concerned to ensure that the Community Empowerment (Scotland) Act 2015 (Doc27) is not 'used as a lever to further minimise the involvement of the public in plans which will affect their lives'. They are concerned that public documents are becoming 'so impenetrable' that they become irrelevant and an instrument of public policy.

Royal Burgh of St Andrews Community Council (910325) PLAN2015_558 considers the use of jargon to mean 'little to most people' for example the term the 'spatial strategy'. The respondent considers this is best exemplified in an extract from Topic Paper 1 Vision & Outcomes (2015) paragraph 1.4 (Doc103) which the respondent outlines. They consider it is 'almost unbelievable' that this is included in a Plan, and is part of information for public consumption.

ENVIRONMENTAL REPORT

Bryan Wallace for National Grid/Scotia Gas Network (763366) PLAN2015_276 considers the need for more emphasis to be placed on the identification of areas in need of remediation and redevelopment thereby contributing towards environmental improvement and sustainable economic development.

GOVERNANCE

Royal Burgh of St Andrews Community Council (910325) PLAN2015_561 considers TAYplan governance to be a 'closed group' and that 'the Scottish Government and the four local authorities which make up the TAYplan have imposed a regime on the public' which will be a 'heavy burden' on this part of Scotland for the foreseeable future.

INTRODUCTORY CONTEXTUAL STATEMENT

Friends of the Earth Tayside (845935) PLAN2015_436 considers an introductory, contextual statement would 'underpin' some of the rationale for individual policies such as references to climate change, modal shift in transport, resource efficiency and green networks and biodiversity. They also consider it would help emphasise why we need to think differently about the type of infrastructure which is designed to meet the challenges of the coming decades. They advise the inclusion of 'some figures that would substantiate trends and projections, and beef up some of the broad statements of intent in the Plan'. They note that these maybe found in related TAYplan background reports, but that it would be useful to have a digest of these in the Plan itself.

NATIONAL POLICY

Strathkinness Community Council (909092) PLAN2015_229 considers it to be important that 'enough contingencies' will be set up to cope with any significant changes in national or Scottish Government policies in forthcoming years.

SUSTAINABLE ECONOMIC GROWTH

Friends of the Earth Tayside (845935) PLAN2015_436 considers that 'sustainable', 'sustainable economic development', 'sustainable growth', and 'sustainable development' are used by different people and organisations in many different ways which often in conflict with 'environmental sustainability', so it is necessary to state how a particular publication or commentator intends each term to be understood. The respondent feels it is then easier to consider whether the content of the document or statement is consistent with the intended meaning of the term.

Summary of Representations Supporting as written

DOCUMENT SUITE

SEStran Regional Transport Partnership (908118) PLAN2015_38 and 39 considers the documents comprehensive but readable. They also consider that the Strategic Environmental Assessment (2014) (Doc35) document identifies the pertinent issues. They

question whether a full Strategic Environmental Assessment is required if there are no significant changes to the original Strategic Development Plan.

Modifications sought by those submitting representations:

ALLOCATION OF LAND

Andrew Dundas (821782) PLAN2015_186 implies change to the rationale of planning away from a system that 'rations' land and for there to be further land and infrastructure available to enable development.

CONSULTATION PROCEDURE

Confederation of St Andrews Residents Associations (339848) PLAN2015_449 Royal Burgh of St Andrews Community Council (910325) PLAN2015_528, Claudine Scott (907629) PLAN2015_224 and Freuchie Community Council (910081) PLAN2015_297 implies changes to the consultation response form and the website in order to make the website and overall process more user-friendly.

HAZARDOUS SUBSTANCES AND INSTALLATIONS POLICY

Quod for Scotia Gas Networks (910286) PLAN2015_394 propose a new Hazardous Substances Installation Policy that removes protection for former gas holder sites and has the flexibility to support high value land uses on such sites to overcome the anticipated costs of decommissioning.

CULTURAL FACILITIES

The Theatres Trust (856633) PLAN2015_522 proposes either the creation of a new policy on community and cultural facilities, or, amendments to be made to the supporting text for the Policy 5 Town Centres First on page 32-34 (Doc80) to say that: 'Local Development Plans should safeguard, promote and enhance existing community and cultural facilities in addition to providing criteria for new community and cultural facilities'.

DOCUMENT SUITE

Royal Burgh of St Andrews Community Council (910325) PLAN2015_558 propose changes to the terminology used throughout the plan to eliminate 'jargon' and use clear language that all can understand.

Bryan Wallace for National Grid/Scotia Gas Network (763366) PLAN2015_263 propose a glossary of terms should be included in Plan.

Coupar Angus & Bendochy Community Council (909949) PLAN2015_294 propose that town locations and connecting roads should be clearly indicated on maps within the plan.

Confederation of St Andrews Residents Associations (339848) PLAN2015_449 propose deletion of what they term 'generalised inspirational statements' about the quality of life for residents in the TAYplan area and about place making. They also propose the introduction of targets (rather than prescriptive standards) for such issues as travel times to education establishments including primary and secondary schools as well as community educational and recreational facilities for adults.

St Andrews Preservation Trust (910253) PLAN2015_539 implied changes to make the suite of documents easier to penetrate and combination of the strategic plan and the proposed action plan.

ENVIRONMENTAL REPORT

Bryan Wallace for National Grid/Scotia Gas Network (763366) PLAN2015_276 incorporation of more emphasis to be placed on the identification of areas in need of

remediation and redevelopment.

GOVERNANCE

Royal Burgh of St Andrews Community Council (910325) PLAN2015_561 propose improvements in what they term the 'time efficiency of committee meetings' and an implied reduction in what is termed the 'heavy burden' that the four local authorities that make up TAYplan have 'imposed'.

INTRODUCTORY CONTEXTUAL STATEMENT

Friends of the Earth Tayside (845935) PLAN2015_436 propose the addition of a brief introductory contextual statement to summarise some of the key environmental, social, technological, economic and demographic trends which are likely to shape the world of 2036. As well as the addition of metrics and targets.

NATIONAL POLICY

Strathkinness Community Council (909092) PLAN2015_229 propose an increase in flexibility and contingencies built into the plan to mean that it is still relevant even after significant national or Scottish Government policy changes in the future.

SUSTAINABLE ECONOMIC GROWTH

Friends of the Earth Tayside (845935) PLAN2015_436 propose the addition of a definition of what this means - development which is environmentally sustainable, or development which can be maintained for a certain period of time.

Summary of responses (including reasons) by Planning Authority:

Authority's Response to Proposed Modifications

ALLOCATION OF LAND

Andrew Dundas (821782) PLAN2015_186

The respondent raises similar issues in the Schedule 4 Summary of Unresolved Issues for Issue 012 Policy 4 Homes Technical and Background Assumptions.

TAYplan does not agree that planning is 'a device for the cruel rationing development land or that this is the main cause of the astronomical rise in site values'. Planning involves thinking about the needs for and impacts of development so that issues can be considered and resolved in advance of action. The purpose of this is to ensure that development and the behaviours it either supports or promotes do not result in adverse consequences for the rest of society.

The Proposed Plan (2015) vision (Doc80) is about quality of life and promotes economic growth, better quality places, better health and living within the Earth's environmental limits. This means that growth is a means to an end and not the end in itself. Identifying land through the planning system provides economic certainty and supports democratic participation in the future of places and people's lives.

TAYplan does not agree the planning system is 'dictatorial' although it is the mechanism through which consent to develop can be refused or granted. The respondent has not provided any evidence which describes how land values have changed or indeed any evidence which clearly and specifically identifies the land owners of allocated sites to have been the main beneficiaries of this. Development can meet social need, provide jobs and promote behaviours that support a better quality of life for many people. It can also contribute to making areas more attractive for future investment and job creation.

TAYplan is not persuaded that more land, on its own, will automatically result in more or indeed better quality development. It is equally plausible that this would instead result in similar levels of development taking place but in different locations. This is not the same

thing and may not offer the same opportunities to deliver the vision and outcomes (Doc80). Therefore although the Proposed Plan (2015) (Doc80) is orientated towards a growing economy this is not at any cost and the vision and policy framework of the Proposed Plan (2015) (Doc80) make this clear.

TAYplan agrees that infrastructure plays a vital role in supporting growth and improving the quality of communities. However, it is a means to delivering those ends rather than an end in itself. TAYplan is satisfied that the Proposed Plan (2015) (Doc80) provides appropriate details to support the delivery of infrastructure and its consequent impacts. The Proposed Action Programme (2015) (Doc76) also sets out the actions necessary to deliver infrastructure proposals or development which includes new infrastructure.

The respondent has not presented any persuasive evidence to describe an alternative workable approach to bring about the changes they seek or explained how this would be better for delivering the vision than the approach outlined in the Proposed Plan (2015) (Doc80). TAYplan therefore does not propose to make any changes to the Proposed Plan (2015) (Doc80).

CONSULTATION PROCESS

Claudine Scott (907629) PLAN2015_224, Royal Burgh of St Andrews Community Council (910325) PLAN2015_528, Confederation of St Andrews Residents Associations (339848) PLAN2015_449 and Freuchie Community Council (910081) PLAN2015_297

TAYplan has made a conscious shift to online systems since many individuals and organisations are appropriately equipped and skilled for this. Online systems offer major timing and resource savings to the development plan process that would otherwise be spent on administering and re-entering hand written or typed responses. To be clear the majority of all responses were online at both Pre-Main Issues early engagements in 2009 and 2013, at both Main Issues Report consultations in 2010 and 2014; and, at both Proposed Plan periods for representations in 2011 and 2015. TAYplan does not therefore agree with the assertion that this process was 'ineffectual'.

The online forms are specifically designed to ensure that respondent can be clearly understood, including which part of the plan the comment relates to and whether a change is sought. The forms can be completed quickly with tick boxes and drop down menus. It was also possible to copy and paste text in from Microsoft Word. This also offered administrative advantages to TAYplan and helped overcome challenges of interpreting handwriting or from essay style responses covering multiple issues.

There have been instances when respondents have experienced difficulties using the online system. When contacted TAYplan has been able to assist.

TAYplan also provided alternatives to online systems as described in the 'Quick Guide to the Period for Representations Leaflet (2015) (032/Extract/1) and Proposed Plan (2015) page 6 (Doc80).

TAYplan does not agree that such exercises are 'bureaucratic', although there is some administration. The central purpose is to be clear, transparent and open so that interested parties can be involved in shaping future public policy. The online systems mentioned above have helped to significantly reduce the bureaucratic impact that may otherwise be apparent with such as process.

Overall TAYplan is satisfied that it has provided an effective online system and also clear alternatives for those who wish to use these. TAYplan has also used the conclusions of its own customer surveys to improve. The preparation of the third Strategic Development Plan provides a good opportunity to take this forward. TAYplan is satisfied that there are no issues raised here that warrant any changes to the Proposed Plan (2015) (Doc80).

Claudine Scott (907629) PLAN2015_224

The respondent contacted TAYplan to say that the email address published in the paper copies of the response forms was incorrect. TAYplan investigated this and found that a spelling error has been missed in quality checks. TAYplan apologised to the respondent and re-printed response forms with the correct email address. TAYplan also noted this as a lesson learned to ensure that future material is checked more thoroughly. Overall only two responses were received that used the paper response forms and these were completed and submitted at community drop-in events. The remainder of representations were made by letters, emails or online.

Confederation of St Andrews Residents Associations (339848) PLAN2015_449

The Schedule of Responses to the Main Issues Report (2014) page 5 (Doc56) shows that Land Owners/Operators/Developers were the largest individual group of respondents at Main Issues Report consultation stage in 2014. The next largest group was made up of individual members of the public. However, these figures exclude the large numbers of young people that TAYplan worked with at primary and secondary schools across the region and through its young place maker initiative.

It is perhaps unsurprising that the development industry has a keen interest in strategic development plans since these have an important role in their day to day business. At Proposed Plan stage the largest individual group of respondents was members of the public.

TAYplan does not agree that it is 'distant from the public', however, like any organisation the only way to remedy such a perception is to create a presence. TAYplan does this actively through Twitter, quarterly newsletters, email updates, its website, news releases, statutory public notices, working with young people, speaking at conferences and through public events during engagement phases. However, not all people know of every public, private or voluntary organisation and this will continue to present challenges in the future.

Through engagement work TAYplan is aware of numerous different concerns and aspirations that are raised by individuals and organisations. TAYplan is also aware of different and related issues resulting from the consideration of research conclusions and other information such as government policy.

Proposed Plan (2015) Policy 1 Part D (Doc80) sets out TAYplan's approach to the St Andrews greenbelt. This is a continuation of the current approach from approved TAYplan (2012) Policy 3 Greenbelts (Doc16). This is considered in more detail in the Schedule 4 Summary of Unresolved Issues for Issue 006 Policy 1D Greenbelts.

To be clear TAYplan does not monitor losses or incursions on agricultural land although the TAYplan Monitoring Statement (2014) Figure 65 on page 63 (Doc101) considers the distribution of prime agricultural land in relation to settlements.

Dundee City Council is the parent body for TAYplan on behalf of the four councils. As such Dundee City Council runs TAYplan's IT and emails and their standard disclaimer appears at the bottom of all emails, including those from TAYplan. TAYplan values the comments received from all people and organisations irrespective of where they live or are located.

HAZARDOUS SUBSTANCES AND INSTALLATIONS POLICY

Quod for Scotia Gas Networks (910286) PLAN2015_394

The respondent has not provided any specific details about what their proposed policy should say or how it should operate. It is therefore not clear what intended scope the proposed new policy would have and how this would impact on the delivery of the Proposed Plan.

The reuse of individual sites is a matter for Local Development Plans and development management decisions. Policy 1 (Doc80) is clear about the reuse of brownfield land for

alternative uses. This includes all sites whether their redevelopment is dependent on decommissioning of some sort or not. Policy 7 (Doc80) is already clear on the decision making framework for energy, waste and resource management infrastructure. Policy 2 Shaping Better Quality Places (Doc80) already applies to all development of all scales in all locations within the TAYplan area. Action Programmes can also set out the requirements to bring individual sites forwards.

The respondent has provided no robust or compelling evidence to justify why their proposed changes are necessary or cannot be dealt with by the current policy framework. The respondent has also provided no robust or compelling evidence to describe how their proposal would operate, how it would result in the outcomes they suggest and how this would better bring about the vision.

TAYplan is satisfied that the existing policy framework (described above) provides sufficient flexibility for the respondent to pursue a variety of different potential land uses for its sites. TAYplan is also satisfied that the Proposed Plan (2015) (Doc80) already provides sufficient strategic clarity for the regeneration of previously developed land and buildings. TAYplan is not persuaded that there is any evidence to support the proposed changes and therefore TAYplan does not propose to make any changes to the Proposed Plan (2015) (Doc80).

CULTURAL FACILITIES

The Theatres Trust (856633) PLAN2015_522

TAYplan agrees that cultural facilities are an important part of a sustainable community and can form a major part of regenerations schemes, for example Dundee Waterfront, which forms part of the Dundee Wider Waterfront Strategic Development Area set out in Policy 3 (Doc80). Such facilities are currently covered by Policy 5 Town Centres First and Policy 9 Managing TAYplan's Assets (Doc80).

Policy 5 Town Centres First (Doc80) focuses high trip generating uses in town centres and also recognises the broader roles of centres, including land uses which relate to their cultural significance. Policy 9 Managing TAYplan's Assets (Doc80) provides protection for natural and historic assets some of which will also have cultural significance.

TAYplan is satisfied that these policies provide the appropriate strategic context for decisions about new development, including the reuse of, renovation of or protection of culturally significant buildings and places. TAYplan is not persuaded that there is any additional evidence to support a new policy which is specifically focussed on cultural assets. Therefore TAYplan does not propose to make any changes to the Proposed Plan (2015) (Doc80).

DOCUMENT SUITE

Bryan Wallace for National Grid/Scotia Gas Network (763366) PLAN2015_263

TAYplan considers the Proposed Plan to be understandable, and that it avoids using complex terms where there is an easier alternative. However, there are instances where it is necessary to use specific terminology or phrases to reflect legal requirements. Where TAYplan uses specific terms these are defined either in policy and supporting text; e.g. principal settlements in Policy 1 (Doc80), or; the accompanying footnotes. TAYplan does not consider the addition of a glossary to be necessary. Therefore TAYplan does not propose to make any changes to the Proposed Plan (2015) (Doc80).

St Andrews Preservation Trust (910253) PLAN2015_539 and Confederation of St Andrews Residents Associations (339848) PLAN2015_449

TAYplan has worked hard to produce a Proposed Plan (2015) (Doc80) which deliberately moves away from more traditional report formats and makes documents easier to understand. Techniques such as story-boarding have been used and considerable thinking has gone into graphics.

TAYplan has also deliberately separated the technical background material from the Plan itself. Therefore the Proposed Plan (2015) (Doc80) explains what is being planned for and directs users to further information where appropriate. The suite of background topic papers allows those who wish to go into further detail to do so. Specific research and assessments are also available for those who want to get into the specifics about individual issues.

As ever there is a balance between complex, technical material which forms a necessary part of our understanding and how best to communicate this in a meaningful way. This is very challenging since the audience includes those for whom these matters are routine and day to day as well as those for whom this is not. Although TAYplan has tried hard to achieve this balance it appears not to have provided everyone with the clarity they would like.

TAYplan has learned some useful skills through story-boarding and graphics work that should assist in helping to make background material more understandable. TAYplan will continue to develop these skills further and use them to help make future material clearer and more understandable. TAYplan does not propose to make any changes to the Proposed Plan (2015) (Doc80).

Coupar Angus & Bendochy Community Council (909949) PLAN2015_294

TAYplan has worked closely with the University of Abertay to harness the computer games graphics expertise available there. The Main Issues Report (2014) (Doc56) shows TAYplan's experimentation with 3D maps and colours. The Proposed Plan (2015) (Doc80) shows the evolution in clarity of these maps.

This is a proposed Strategic Development Plan and so the maps are broad and strategic in scale. They do not identify specific towns or proposals for e.g. roads etc. The towns and roads/rail presented on maps are either contextual to help understand locations or specifically relate to a Policy or strategic proposal. More detailed proposals and individual sites or locations are covered by Local Development Plans.

TAYplan does not consider there to be a need to alter the maps and therefore does not propose to make any changes to the Proposed Plan (2015) (Doc80).

Confederation of St Andrews Residents Associations (339848) PLAN2015_449

TAYplan accepts that its vision will probably be shared by lots of different organisations in different parts of the UK and beyond. There is nothing wrong with this and it is difficult to imagine circumstances where such a vision would be rejected. The purpose of the vision is to make clear what is being planned for and the policies set out the decision making framework to achieve it.

Some policies are not prescriptive such as Policy 2 Shaping Better Quality Places (Doc80). Rather than imposing a one size fits all regime this Policy states a series of requirements where proponents of development must demonstrate how they will design-out issues. The approach is therefore the same but the solutions will vary because all places are different and sometimes there may be more than one solution. There are also some other factors governing quality of life that are determined by matters that are outwith the remit of the land use planning system. These elements are relevant to all people because they will affect how people's surroundings change and will shape how places function and support social, economic and environmental progress.

TAYplan agrees that it will be important for public bodies to work together to support the spirit of the Community Empowerment (Scotland) Act 2015 (Doc27). TAYplan is an example of a statutory partnership of 4 councils and works closely with a wide range of stakeholders including the public. The processes and requirements for public engagement are open, democratic and are clearly established in the Planning etc. (Scotland) Act (2006) (Doc74), the Town & Country Planning (Development Planning) (Scotland) Regulations

(2008) (Doc107) and Circular 6/2013 Development Plans (Doc25). TAYplan is not clear how the provisions of the Community Empowerment (Scotland) Act 2015 (Doc27) could be considered to alter these requirements in a way that would result in less involvement. The changes to community land ownership do not present conflicts with the policy framework set out in the approved TAYplan (2012) (Doc16) or the Proposed Plan (2015) (Doc80). TAYplan does not propose to make any changes to the Proposed Plan (2015) (Doc80).

Royal Burgh of St Andrews Community Council (910325) PLAN2015_558

TAYplan agrees that there are some technical terms that may not be familiar to everybody. However, the job of the Plan is to explain these in a way which helps people to understand without adversely affecting the operation of the plan itself. The term 'spatial strategy' is used on Proposed Plan (2015) page 12 in the first sentence (Doc80). It is then explained in the same sentence. Other terms are described in the supporting text or in footnotes.

TAYplan does not share the view that it is 'unbelievable that such a paragraph should be included in a plan of this nature'. To be clear the paragraph is not part of a plan but instead a topic paper which sits as a background document alongside the Proposed Plan (2015) (Doc80). Paragraph 1.4 from Topic Paper 1 Vision & Outcomes (2015) (Doc80) does not sit alone and is explaining the differences between vision and outcomes. TAYplan is content that the paragraph and those it sits with explain clearly the messages they are trying to communicate. That said these comments provide the opportunity to reconsider how topic papers are written and presented in future and TAYplan will be considering this ahead of the next plan review. TAYplan does not propose to make any changes to the Proposed Plan (2015) (Doc80).

ENVIRONMENTAL REPORT

Bryan Wallace for National Grid/Scotia Gas Network (763366) PLAN2015_276

Sites in need of remediation are already listed in the Scottish Vacant and Derelict Land Survey which is updated annually. Council Housing Land Audits also consider the effectiveness of sites and identify constraints that may exist. The Proposed Action Programme (2015) (Doc76) sets out the actions necessary to deliver the Strategic Development Areas in Policy 3 (Doc80). Proposed Plan (2015) Policy 1 (Doc80) makes clear TAYplan's Location Priorities for the release of land. The remediation of contaminated sites is an implicit priority with Policy 1 (Doc80), under the general description of brownfield land, which will include some sites which are contaminated or require remediation of some kind, as well as those which do not. It will be for respective councils to do the same for other sites through their Local Development Plans and accompanying Action Programmes. TAYplan is therefore not persuaded that any changes need to be made to the Proposed Plan (2015) (Doc80) in order to respond to the proposed changes.

GOVERNANCE

Royal Burgh of St Andrews Community Council (910325) PLAN2015_561

For clarity TAYplan is a statutory partnership of Angus, Dundee City, Fife and Perth & Kinross Councils. The Scottish Government is not a partner although the Scottish Government and many of its agencies work closely with TAYplan.

TAYplan does not agree that it is a 'closed group'. The TAYplan Joint Committee is made up of 12 elected councillors – three from each council. Their decisions on the Main Issues Report and the Proposed Plan are ratified by each of the four constituent councils.

All stages of engagement are described in the TAYplan Statement of Conformity (2016) (Doc90). This shows that the process and governance arrangements have been open, transparent and democratic. TAYplan will always look to improve but is satisfied that it has reflected the requirements of legislation and has also gone beyond them in some cases, for instance the publication of the Schedule of Responses to the Main Issues Report

(published February 2015) (Doc83). There is no requirement to publish such a document but TAYplan considers this to help interested parties to see how their views have been considered between Main Issues Report and Proposed Plan stages. TAYplan considers this to be a further way of helping people to understand how strategic planning is working.

TAYplan is also satisfied that the Proposed Plan (2015) (Doc80) is clear, well evidenced and coherent. TAYplan does not agree that this represents a 'heavy burden' although TAYplan respects that this description is a matter of judgement to which the respondent is entitled to hold their view on. TAYplan does not propose to make any changes to the Proposed Plan (2015) (Doc80).

INTRODUCTORY CONTEXTUAL STATEMENT

Friends of the Earth Tayside (845935) PLAN2015_436

Much of the introductory context is written in the Leadership and Action section and also the vision and transformational projects map on pages 3 to 6 of the Proposed Plan (2015) (Doc80). TAYplan is satisfied that these give the user a sense of what the plan is for with each individual policy area being linked back to this. The policies are stated first with maps where appropriate and then a section which explains what the policies are for and how they work. This allows the reader to make the connection between individual policies and the vision and also to see the policy, its spatial implications and understand how the policy is intended to operate.

The purpose of the plan is to say what is planned. Much of the detailed reasoning and statistical evidence is presented in background papers. Older plans frequently included lengthy context and introductory sections before finally getting to the point. Both the approved TAYplan (2012) (Doc16) and the Proposed Plan (2015) (Doc80) move away from such an approach to a briefer and more upfront clarity.

The trends described by the respondent have been covered in various sections of the Proposed Plan (2015) including page 26 (Doc80), in depth in the Main Issues Report (2014) where these were relevant for options (Doc56) or in background papers and research such as Chapter 2 of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97).

The respondent has provided no specific detailed text that they wish to see added and TAYplan is satisfied that all of the material they describe is either contained in the Proposed Plan or back ground material. TAYplan therefore proposes no changes.

NATIONAL POLICY

Strathkinness Community Council (909092) PLAN2015_229

TAYplan considers that the Proposed Plan (2015) (Doc80) is consistent with Scottish Planning Policy (2014) (Doc84), National Planning Framework 3 (2014) (Doc60) and other national policy. TAYplan has examined genuine issues for the future and considers that it has anticipated future needs. However, one can never be truly proofed against changes to national policy. It is also true to say that even if national policy does not change local, regional or national circumstances may change or new research may reveal new information or make clearer a situation.

All of these factors whether alone or combined may result in a need to alter the policy context of a plan whether through enhancements to existing policy or a complete change. Similarly the changes described above may not always result in a need to alter a plan and could be accommodated within the existing policy framework. It is difficult to anticipate all of these circumstances and sometimes it may be necessary to argue where local circumstances differ to the national policy position.

These are some of the reasons why there is a legal requirement to review and submit a new Proposed Strategic Development Plan within four years of the preceding plan being

approved. TAYplan is satisfied that this legal requirement and the associated, legally defined procedures provide an appropriate mechanism to deal with the issues raised by the respondents in an open and democratic way. Therefore TAYplan proposes no further changes.

SUSTAINABLE ECONOMIC GROWTH

Friends of the Earth Tayside (845935) PLAN2015_436

TAYplan agrees that there are numerous different terms relating to the parent concept of sustainability. However, each of these is united by the concept of sustainability whether it is 'growth', 'development' or 'economic development'. This is because there is a recognition that sustainability will not work or be accepted if the consequence is not an improvement in quality of life. This requires a stronger economy with more jobs and fewer disparities; access to homes, jobs, services and facilities; good quality living environments so that people can live healthy and happy lives. It also requires and must be achieved by working within the Earth's environmental limits otherwise these things will not be sustainable and will not be available to future generations.

These concepts are encapsulated within the Proposed Plan (2015) vision on page 4 and the outcomes expressed on page 8 (Doc80). These factors together explain what is necessary to deliver the various concepts referred to by the respondent. The more detailed thinking on the vision and outcomes are considered in Topic Paper 1: Vision and Outcomes (2015) (Doc103). The factors described are also clear from each of the policies which focus on the location, design and layout of development and how these support people and organisations to behave in more sustainable ways.

TAYplan is therefore satisfied that the Proposed Plan (2015) (Doc80) appropriately deals with these issues and spells out its message in a clear way. TAYplan does not propose to make any further changes.

Authority's Response to Supporting Representations

DOCUMENT SUITE

SEStran Regional Transport Partnership (908118) PLAN2015_38 and 39

TAYplan welcomes the support and considers that a Strategic Environmental Assessment is essential at Main Issues Report stage to consider the environmental implications of proposals. TAYplan agrees that there is no need to prepare a new Strategic Environmental Assessment following Main Issues Report stage if there are no changes to the options and proposals considered in the Main Issues Report and the original Strategic Environmental Assessment.

CONCLUSIONS

The respondents have raised a range of varied points about the Proposed Plan (2015) (Doc80) itself, the process and mechanisms employed during the period for representations and the document suite.

Although TAYplan considers that the presentation of documents and the arrangements and procedures for public engagement were good there have also been lessons learned. Some of these responses and the TAYplan Customer Survey (2015) (032/Extract/2) have provided constructive feedback to assist in improving future engagement. Although TAYplan will look further into these and explore the options they do not warrant any changes to the Proposed Plan (2015).

The matters raised by respondents seeking specific policy changes or the addition of text and other material are considered to be well reflected within the existing content of the Proposed Plan (2015) (Doc80). No compelling or robust evidence has been presented that persuades TAYplan that there is a need to change the Proposed Plan (2015) (Doc80) or that the existing policy framework is not satisfactory.

Neither the Scottish Government nor any other government agency has raised any issues regarding those raised in this Schedule 4 Summary of Unresolved Issues.

TAYplan considers that all of the issues raised do not warrant any change to the Proposed Strategic Development Plan (May, 2015) (Doc80) and propose that the elements dealt with in this Schedule 4 Summary of Unresolved Issues remain as written and unchanged.

Reporter's conclusions:

DPEA use only

Reporter's recommendations:

DPEA use only

Committee Version