Issue (ref and	Issue 003: Policy 1A: Location Priorities - Settlement Hierarchy –	
heading):	Policy Principle	
Development	Policy 1 Part A and Map 1	Reporter:
plan reference:	pages 10 to 13	[For DPEA Use Only]

Body or person(s) submitting a representation raising the issue (including reference number):

## Seeking a change

Dr Peter Symon (548525)

Emac Planning LLP for Delson Contracts Ltd (846826)

Emac Planning LLP for F M & G Batchelor (846821)

Emac Planning LLP for J G Lang & Son (846827)

Emac Planning LLP for Landvest PCC Ltd (910292)

Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825)

Emac Planning LLP for R Watson & Son (846824)

Emac Planning LLP for Scotia Homes Ltd (910294)

Emac Planning LLP for Stewart Milne Homes North Scotland (347277)

Montagu Evans LLP for Wallace Land Investment Management (343111)

Ryden for Barratt North Scotland (910146) Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701) Scottish Property Federation (444087)

#### Supporting as written

Dundee Civic Trust (845127)

Emac Planning LLP for Delson Contracts Ltd (846826)

Emac Planning LLP for Scotia Homes Ltd (910294)

Friends of the Earth Tayside (845935) NHS Tayside (908896)

Scottish Environment Protection Agency (835401)

Scottish Water (762198)

SEStran Regional Transport Partnership (908118)

Tactran Regional Transport Partnership (441235)

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

Policy 1 Part A and Map 1 set out the settlement hierarchy. This identifies all principal settlements, where most new development is to be focussed. It also groups them into 3 tiers. Each tier describes the broad role these settlements will play in accommodating future development. The specific identification of sites and the scale of development to be accommodated is a matter for Local Development Plans.

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

## Summary of Representations Seeking a change

## ISSUE REGARDING THE TIER OF A SETTLEMENT IN THE HIERARCHY

Ryden for Barratt North Scotland (910146) PLAN2015\_386 supports Monifieth being a tier 1 principal settlement but suggests that this is not reflected in Policy 4 Part A/Map 4 (Doc80) housing supply targets for South Angus.

Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701) PLAN2015\_308, Scottish Property Federation (444087) PLAN2015\_510, Dr Peter Symon (548525) PLAN2015\_410 and Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015\_529 each seek the removal of or changes to tiers 2 and 3 of the settlement hierarchy because each consider this currently constrains development in particular settlements.

Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701) PLAN2015\_308 consider that the Montrose Port Strategic Development Area (Policy 3 – Doc80) and proposals for a regional rail freight facility at Montrose (Map 10 (Doc80) and Proposed Action Programme (Doc76)) justify higher housing supply targets than proposed in Policy 4/Map 4 (Doc80) for Montrose. They consider Scottish Planning Policy (2014) paragraph 109 (Doc84) to support this.

**Scottish Property Federation (444087) PLAN2015\_510** seeks removal of the tiered approach or, alternatively, an amendment to the definition of tier 2 settlements because they consider that the settlement hierarchy could constrain some settlements from making a significant contribution to the regional economy.

The respondent cites particular instances where sites may be in close proximity to Strategic Development Areas (Policy 3) (Doc80). They suggest that these areas should be 'given the opportunity to absorb a larger scale of the housing land requirements identified in Policy 4' (Doc80) in order to 'promote sustainable development by locating homes and areas of business close to each other'.

**Dr Peter Symon (548525) PLAN2015\_410** proposes a reduction in the number of tiers outwith the Core Areas. This is to 'achieve consistency across the TAYplan region, particularly with the Fife and Angus Council areas' and avoid what is described as 'duplication of locational priorities (based on both area and settlement)'. He also suggests merit in adopting the approaches of Clydeplan (Doc14) and SESplan (Doc15) in achieving an 'economic and effective expression of spatial development priorities'. He suggests that this should be done by 'using sub-regional areas as the initial basis for distinguishing such priorities' and secondly to consider specific locations within or outwith these sub-areas.

Emac Planning LLP for Stewart Milne Homes North Scotland (347277)
PLAN2015\_529 considers that Tiers 2 and 3 are 'too prescriptive' and that the current descriptions have the ability to 'stifle potential development opportunities' and limit the release of what they term as 'sustainable, locationally sensitive, market driven development' before it has been assessed in detail.

They also propose changing Auchterarder from a Tier 3 settlement to a Tier 2 settlement on the basis of its location on what is described as the 'strategic road (A9) and rail corridor between Perth and Stirling/Clasgow'.

## RECONSIDER THE STRATEGIC ROLE OF SETTLEMENTS

Montagu Evans LLP for Wallace Land Investment Management (343111)
PLAN2015\_251 proposes that TAYplan should review the strategic nature and capacity of settlements across the region. The respondent considers that Kinross is an example of a place future growth should be focused.

## MAKE CLEAR THAT 'MAJORITY' DOES NOT MEAN 'ALL

Related issues are also covered in the Schedule 4 Summary of Unresolved Issues for Issue 005 Policy 1C Settlement Boundaries.

Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_399, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_511, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_512, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_490, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_438, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_412, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_461 and Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_477 propose alterations to make clear that the word 'majority' does not mean 'all' when referring to focusing the majority of new development within principal settlements. They suggest that some local authorities consider that 'majority' means 'all'. They consider that such a change is justified on the basis of Scottish Planning Policy (2014) paragraphs 40 and 110 to 119 (Doc84).

Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_399, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_412 and Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_438 suggest Angus and Fife to be examples of this (above).

## **Summary of Supporting Representations**

**Friends of the Earth Tayside (845935) PLAN2015\_416** supports the settlement hierarchy and sequential approach but recognises the need to 'appreciate the viability of smaller settlements'.

Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_515 and Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_480 each support the continued approach of prioritising land release within principal settlements ahead of other locations as consistent with Scottish Planning Policy (2014) (Doc84).

**Tactran Regional Transport Partnership (441235) PLAN2015\_357** support approach as consistent with the Regional Transport Strategy (Doc94).

**SEStran Regional Transport Partnership (908118) PLAN2015\_33** support approach from sustainability perspective.

Scottish Environment Protection Agency (835401) PLAN2015\_193 support the strategy as part of a response to emissions, climate change, travel choices and air quality.

Scottish Water (762198) PLAN2015\_266 support the continuation of the current development strategy.

**NHS Tayside (908896) PLAN2015\_322** support the continuation the same strategic focus as the previous plan, concentrating development in a tiered way as part of the 'long term planning to drive sustainability and economic progress for the region'.

**Dundee Civic Trust (845127) PLAN2015\_279** supports Policy 1 on the basis that it represents the 'best use of resources and infrastructure capitalising on investment, skills and strategic infrastructure'. They consider that one of the constituent authorities has granted some planning permissions which the respondent considers to be contrary to the Plan. They question what powers TAYplan has to ensure the plan is adhered to and they consider that a single authority should be responsible for the wider Dundee area.

#### Modifications sought by those submitting representations:

#### ISSUE REGARDING THE TIER OF A SETTLEMENT IN THE HIERARCHY

Ryden for Barratt North Scotland (910146) PLAN2015\_386 propose no specific changes to Policy 1A regarding their comments about Monifieth. Instead the related modifications appear to be in their response to Policy 4 Homes (PLAN2015\_387) and this issue is covered in the Schedule 4 Summary of Unresolved Issues for 014. This representation includes comments and proposed changes to Policy 1 Part B which are considered in the Schedule 4 Summary of Unresolved Issues for 004 Policy 1B Location Priorities – Sequential Approach.

Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701) PLAN2015\_308 propose the deletion of tiers 2 and 3.

**Scottish Property Federation (444087) PLAN2015\_510** propose the removal of tiers 2 and 3 or the amendment of the description for tier 2 (in Policy 1 Part A) to say 'accommodate an appropriate share of the additional development based on the need and demand of a settlement'.

**Dr Peter Symon (548525) PLAN2015\_410** proposes the revision of Pages 10, 11 and 13 to reduce the number of tiers of settlements, outwith the two Core Areas, to one or two levels of 'Key, Strategic or Principal Towns'.

# Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015\_529 propose:

- changing Auchterarder from Tier 3 to Tier 2
- new text saying "Local Development Plan Main Issues Reports should fully consider options for housing and other development in all Tier 1 to 3 Principal Settlements. Where there are no or limited sustainable development opportunities remaining within existing settlement boundaries, full consideration should be given to reviewing those development boundaries to facilitate the numerical requirements of Policy 4: Homes."

## RECONSIDER THE STRATEGIC ROLE OF SETTLEMENTS

Montagu Evans LLP for Wallace Land Investment Management (343111) PLAN2015\_251 propose a further review to consider the strategic nature of settlements across the plan area and for TAYplan to explore the future capacity of these settlements in a strategic manner.

## MAKE CLEAR THAT 'MAJORITY' DOES NOT MEAN 'ALL'

Related modifications are also sought in the Schedule 4 Summary of Unresolved Issues for Issue 005 Policy 1C Settlement Boundaries.

Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_512, Emac Planning LLP for J G Lang & Son (346827) PLAN2015\_438, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_490, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_461, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_477, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_511 and Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_412 all propose amendments to Policy 1A as follows:

"Strategies, plans, programmes and development proposals shall focus the majority, but not all of development in the region's principal settlements as shown on Map 1 (opposite). Local Development Plans should also prioritise prownfield sites in preference to greenfield allocations, including outwith settlements where they support strategic planning objectives. In order to ensure that sustainable development opportunities are achieved across the whole of the SDP area Local Development Plans should review all development boundaries, both within the principle settlements and within other settlements to facilitate the numerical requirements of Policy 4: Homes."

## Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_399 propose amendments to Policy 1A as follows:

Policy 1A is amended as follows: "Strategies, plans, programmes and development proposals shall focus the majority, <u>but not all</u> of development in the region's principal settlements as shown on Map 1 (opposite). <u>Local Development Plans should also prioritise brownfield sites in preference to greenfield allocations, including outwith settlements where they support strategic planning objectives. In order to ensure that sustainable development opportunities are achieved across the whole of the SDP area Local Development Plans should review all development boundaries, both within the principle settlements and within other settlements to facilitate the numerical requirements of Policy 4: Homes. The redevelopment of Crail Airfield as a new sustainable mixed use settlement within the St Andrews and East Fife Housing Market Area will complement the Principal Settlement Hierarchy."</u>

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

#### Context

In 2009, when preparing the approved TAYplan (2012) (Doc16), the current and future roles anticipated for the principal settlements were considered. This included their roles in what were then the operational Structure Plans and also other factors such as population size and the significance of the settlements now and in the future. Other related factors were considered in the TAYplan Background Technical Paper (2010) pages 106-114 (Doc17). This accompanied the TAYplan Main Issues Report (2010) (Doc118).

TAYplan specifically sought views in the Main Issues Report (2010) Question 12 (pages 40 to 47) (Doc118) about whether respondents agreed with the identified principal settlements. The responses were considered in Topic Paper 6: Spatial Strategy (2011) (Doc106). At this stage little justification was provided by respondents to support their views that settlements should be added, removed or be in different tiers. TAYplan expressed its thinking on principal settlements in Topic Paper 6: Spatial Strategy (2011) pages 5 to 7 (Doc106). Although some representations were also received at proposed plan stage in 2011 these also lacked justification and TAYplan did not make any changes prior to submission. Scottish Ministers then approved the plan and also made no changes to the principal settlements defined in approved TAYplan (2012) Policy 1 (Doc16).

When the review of the approved TAYplan (2012) (Doc16) began it was determined that the current vision was appropriate and that no further changes would be necessary to the principal settlements approach or to those named principal settlements. This was made clear in Main Issues Report (2014) pages 56 and 57 (Doc56). Policy 1A/Map 1 (Doc80) therefore represent a continuation of the approved TAYplan (2012) (Doc16).

## **Authority's Response to Proposed Changes**

## ISSUE REGARDING THE TIER OF A SETTLEMENT IN THE HIERARCHY

## Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015 529

No evidence has been provided for changing Auchterarder from Tier 3 to Tier 2. It is therefore unclear what advantage or difference, if any, this would make. The current description of tier 3 settlements appropriately describes the scale of development already planned there. TAYplan is not persuaded that any compelling evidence has been provided to adequately justify this proposed change.

## Scottish Property Federation (444087) PLAN2015\_510

When preparing the approved TAYplan (2012) (Doc16) it was recognised that outside of the Dundee and Perth Core Areas there was a range of other principal settlements. Some had larger populations and concentrations of services and infrastructure than others. The current approach does not prevent development per se in these principal settlements; rather it explains the reality that the larger principal settlements (Tier 2) have larger markets and stronger economic roles than the smaller principal settlements (Tier 3).

When considering some of the Tier 2 principal settlements, several contain major drivers of growth such as Montrose Port and St Andrews University. These make a significant contribution to the region's economy and bring some growth and new development but they do not necessarily result in substantial growth on the scale anticipated within the two core areas. The scale of house building planned (Housing Supply Targets set out in Policy 4/Map 4 – Doc80) are set out for housing market areas and not settlements. They are based on identified need and demand for new

homes from the robust and credible TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97). Proposed Plan (2015) Policy 1 (Doc80) sets out the focus for development. It is for individual Councils to determine the specific sites and share of development to be accommodated within each principal settlement. This also does not prevent additional growth in areas neighbouring Strategic Development Areas, although, given their scale, it is likely that the Strategic Development Areas will be the growth nodes. Pointing this out in Policy 3 (Doc80) provides certainty and clarity for investors.

## Dr Peter Symon (548525) PLAN2015\_410

The TAYplan area is different to the Clydeplan and SESplan areas. First, it has two cities rather than one large conurbation. Second, it is made up of a large area where 75% of people live in the principal settlements identified. These are where most people, jobs, services and facilities are and it makes sense that these are the basis for the strategy.

Sub-regions can work within large conurbations or to differentiate between settlements groupings. Although TAYplan considered this when preparing the approved TAYplan (2012) (Doc16) the strong interdependencies between principal settlements made this confusing and difficult to express. It also made it difficult to adequately evidence any choices for sub-regions that would be meaningful. The respondent has not provided any evidence to support this position or any suggestion of what sub-regions could be adopted.

The least confusing way to express some of these interdependencies was through the identification of the Core Areas, which went on to form part of Policy 1. Similarly even if sub-regions had been created TAYplan would still want to focus the majority of new development within the principal settlements of those sub-regions. As such TAYplan considers the present approach to be the simplest and clearest way to demonstrate location priorities necessary for the sustainable pattern of development demanded by the vision and reflected in Scottish Planning Policy (2014) Paragraphs 40 and 76 to 83 (Doc84).

TAYplan does not consider there to be any inconsistency between the identification of principal settlements across all four council areas. The issues relating to this have been considered in more detail in the Schedule 4 Summaries of Unresolved Issues 002 Named Settlements and 004 Sequential Approach. Even without the amendments proposed here and on the respondent's other representations TAYplan does not consider there to be a 'duplication of locational priorities (based on both area and settlement)'. Policy 1 is clear about where development should be concentrated and sets out an appropriate framework to consider other locations. TAYplan is therefore not persuaded that the proposed amendments would bring clarity or value to delivering the vision.

# Ryden for Barratt North Scotland (910146) PLAN2015\_386 and Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701) PLAN2015\_308

These representations raise issues that are strongly related to housing covered in the Schedule 4 Summary of Unresolved Issues 014. Housing supply targets and housing land requirements in Policy 4/Map 4 (Doc80) have been reached by considering the conclusions of the 'robust and credible' TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97) and related matters considered in the TAYplan Housing Analysis Paper (2015) pages 25 to 48 (Doc100) and Topic Paper 2 Growth (2015) pages 22 to 52 (Doc104).

The housing supply targets and housing land requirement are presented for the South Angus part of the Greater Dundee Housing Market Area and the North Angus Housing Market Area – not at settlement level. However, Policy 1 does set out where Local

Development Plans should identify land to accommodate the majority of homes to meet this identified need and demand for new homes. This will be the principal settlements within the respective housing market areas. It will be for the Angus Local Development Plan to determine the most appropriate sites within principal settlements to accommodate new homes (and indeed other land uses). There is no requirement in either Policy 1 or Policy 4 (Doc80) that directs Local Development Plans to provide any quota for any particular principal settlements versus another.

## Ryden for Barratt North Scotland (910146) PLAN2015\_386

Policy1A and Map 1 make clear for the South Angus part of the Greater Dundee Housing Market Area that the majority of these new homes will need to be accommodated in Monifieth, Carnoustie and Muirhead/Birkhill. Therefore TAYplan does not agree that Policy 4 (Doc80) fails to recognise the status of Monifieth or any other principal settlement and proposes no change to this policy. The respondent has also raised this issue in relation to Policy 4. This and related issues are considered in the Schedule 4 Summary of Unresolved Issues 014.

Ryden for Bon Accord Land Ltd/Stewart Milne Homes (843701) PLAN2015\_308
Policy1A and Map 1 make clear for the North Angus Housing Market Area the majority of these new homes will need to be accommodated in Brechin and Montrose. The respondent does not provide any other justification for their proposed changes at Montrose than the presence of the Montrose Port Strategic Development Area and Regional Transport Strategy proposals for rail freight.

This does not demonstrate any shortcoming in the Proposed Plan. The growth planned for reflects the projected growth for the area. As part of the broader growth assumptions for the TAYplan-wide Housing Need and Demand Assessment (2013) (Doc97) it was recognised that the types of skills associated with growth in the offshore and port sector were already present in Montrose and along the A90/A92 corridor and north to Aberdeen. Therefore this growth may not necessarily result in substantial demand for new homes but instead be fed by the existing workforce and skills base that is within reach of Montrose.

Following the TAYplan Housing Analysis Paper (2015) (Doc100) TAYplan is satisfied that the planned scale of growth is appropriate. Again, the respondent has not provided any alternatives to this and no evidence that refutes the conclusions of the TAYplan-wide Joint Housing Need and Demand Assessment (2013) (Doc97). Therefore TAYplan does not agree that Policy 4 (Doc80) fails to recognise the status of Montrose or any other principal settlement and proposes no change. The respondent has also raised related comments in response to Policy 4 (Doc80). This and related issues are considered in the Schedule 4 Summary of Unresolved Issues 014.

## RECONSIDER THE STRATEGIC ROLE OF SETTLEMENTS

# Montagu Evans LLP for Wallace Land Investment Management (343111) PLAN2015\_251

TAYplan is satisfied that it has considered the role of settlements including Kinross and that no additional evidence has been presented which justifies the changes sought. More detailed issues; including the identification of specific sites is a matter for the respective Local Development Framework. There are also no Strategic Development Areas in Kinross.

#### MAKE CLEAR THAT 'MAJORITY' DOES NOT MEAN 'ALL'

Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_399, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_511, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_512, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_490, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_438, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_412, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_461 and Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_477

Related issues are also covered in the Schedule 4 Summary of Unresolved Issues for Issue 005 Policy 1C Settlement Boundaries.

TAYplan is confident that the definition of the word 'majority' is clear in meaning a share larger than all others combined. TAYplan is also confident that this could not be mistaken for the word 'all' which means everything or 100%. As written Policy 1 is clear in what it asks for. It recognises that principal settlements are where most jobs, services and facilities are already located and this complements the vision. The approach recognises that there are circumstances in which development in other locations (outwith principal settlements) may be necessary or appropriate. It also recognises that it may be appropriate for local authorities to determine that all of the housing allocations should be directed towards principal settlements. TAYplan is satisfied that Policy 1 Part B and Part C (Doc80) provide a clear framework to operate such an approach that is clear to users of the plan.

The respondents justify the proposed changes on the basis of Scottish Planning Policy (2014) paragraphs 40, 110 and 119 (Doc84).

Paragraph 40 (Doc84) lists a series of important considerations for a sustainable pattern of development. TAYplan considers that the vision, Policy 1 and all other policies in the Proposed Plan (2015) reflect these priorities in the optimal way. The respondents have provided no evidence to link Policies in the proposed plan with action on the ground which has directly led to circumstances that contravene these policy intentions. TAYplan is therefore not persuaded that the proposed amendments would better deliver Scottish Planning Policy (2014) (Doc84) or the vision. Given what they seek TAYplan considers that if these amendments were to be included in the Plan the likelihood of delivering these intentions of Scottish Planning Policy (2014) (Doc84) and the TAYplan vision (Doc80) would be greatly diminished.

Paragraph 110 (Doc84) sets out three principles for Scottish Planning Policy's approach to housing but neither of these three specifies the need to set out the approach proposed by the respondents. Paragraph 119 (Doc84) describes the need for a 5 year effective land supply at all times but does not specify the measures that the respondents proposed as the solution. Therefore reference to these paragraphs does not provide any further compelling evidence to support taking forward the proposed amendments.

## **Responses To Supporting Representations**

## Friends of the Earth Tayside (845935) PLAN2015 416

TAYplan welcomes the recognition of these different matters in setting out the location priorities.

Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_515, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_480, Dundee Civic Trust (845127) PLAN2015\_279, Tactran Regional Transport Partnership (441235) PLAN2015\_357, SEStran Regional Transport Partnership (908118) PLAN2015\_33, Scottish Environment Protection Agency (835401) PLAN2015\_193, Scottish Water (762198) PLAN2015\_266 and NHS Tayside (908896) PLAN2015\_322

TAYplan welcomes this support for the continuation of the location priorities set out in Policy 1.

#### **Dundee Civic Trust (845127) PLAN2015\_279**

For clarity there is no legal duty or remit for TAYplan to comment upon the conformity or otherwise of planning applications. It is the duty of councils as Local Planning Authorities to determine planning applications and make the appropriate decisions. Council boundaries or any amendments to these are a matter for Scottish Government and the Boundary Commission.

#### CONCLUSION

Proposed Plan (2015) Policy 1 (Doc80) is a continuation of the approved TAYplan (2012) Policy 1 (Doc16). No changes were proposed at Main Issues Report (2014) stage because this strategy is directly designed to deliver the vision, which is not proposed to change. The approach in Policy 1 is also consistent with that of Scottish Planning Policy (2014) paragraphs 40 and 76 to 81 (Doc84).

TAYplan does not consider that any robust or compelling evidence has been provided to justify the proposed changes to the settlement tiers, their descriptions and operation in Policy 1/Map 1 or the related supporting text on page 13 (Doc80).

TAYplan considers that the amendments proposed to tier descriptions would change the location priorities in a way that would adversely affect the delivery of the vision by concentrating more development in smaller settlements than intended. As such it would result in a fundamentally different spatial strategy than the one which currently exists in the approved TAYplan (2012) (Doc16) and is proposed to continue in Proposed TAYplan (2015). Given that no change is proposed to the vision TAYplan is satisfied that there is also no change needed to Proposed Plan (2015) Policy 1 (Doc80).

TAYplan is also not persuaded that the word 'majority' is unclear and is confident that users of the plan will <u>not</u> require the difference between 'majority' and 'all' to be explained to them.

TAYplan is satisfied that it has appropriately considered the current and future role of settlements and establishes a clear framework for Local Development Plans to identify sites, whilst also considering other important factors that influence the location of development in a way which reflects the vision.

It is also noted that Scottish Government has not raised any issues with Policy 1A and Map 1 and that several Key Agencies have specifically supported the policy.

TAYplan is satisfied that many of these issues are dealt with appropriately by the Policy as currently written and supported by other policies in the Proposed Plan (2015) (Doc80) and Scottish Planning Policy (2014) (Doc84).

TAYplan considers that all of the issues raised do not warrant any change to the Proposed Strategic Development Plan (2015) and propose that the elements dealt with in this Schedule 4 Summary of Unresolved Issues remain as written and unchanged. TAYplan therefore proposes to make no change to Policy 1 Part A, Map 1 (Doc80) and subsequent related supporting text.

Reporter's conclusions:		
DPEA use only		
Reporter's recommendations:		
DPEA use only		

