REPORT TO: PERTH, DUNDEE, ANGUS AND NORTH FIFE

STRATEGIC DEVELOPMENT PLANNING AUTHORITY JOINT COMMITTEE MEETING ON 14th OCTOBER 2014

REPORT ON: TAYPLAN MAIN ISSUES REPORT 2014: CONSULTATION

RESPONSES

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PLAN AUTHORITY MANAGER

REPORT NO: SDPA06-2014

1 PURPOSE OF REPORT

1.1 This report provides the Joint Committee with an overview of the response to the consultation on the Main Issues Report 2014 of the Strategic Development Plan.

2 SUMMARY

- 2.1 An overview of responses to the Main Issues Report consultation is included in this report. 121 responses were received together with many comments noted during the drop-in events and events with young people.
- 2.3 This report also evaluates the consultation events, Young Placemakers projects, summarises responses to Main Issues Report and comments on the Environmental Report and Equalities Impact Assessment.
- 2.4 Overall, the comments and responses received provided a diverse range of views. Many comments provide helpful thoughts to assist in drafting the Proposed Plan.

3 RECOMMENDATION

- 3.1 It is recommended that the Joint Committee:
 - Note the overview of responses to the Main Issues Report 2014 consultation, the Environmental Report and Equalities Impact Assessment.

4 FINANCIAL IMPLICATIONS

4.1 There are no direct financial implications arising from this report.

5 MAIN ISSUES REPORT CONSULTATION - EVENTS

Introduction

- The TAYplan Main Issues Report Consultation started on Tuesday 15th April 2014 for just over 10 weeks until Friday 27th June 2014. Late submissions up to Wednesday 2nd July 2014 were accepted. The consultation sought responses to the Main Issues Report itself and on the accompanying Environmental Report and Equalities and Human Rights Impact Assessment. The documents were available in council planning offices, area/access/ local offices, libraries and on the internet. The consultation responses have also informed Tactran's Regional Transport Strategy refresh. Tactran contributed £1,500 to the consultation programme. In addition, the Scottish Government awarded £5,000 to TAYplan which enabled 8 community events to be run rather than 4 and to produce the video flythrough.
- 5.2 Copies of all documents in hard copy and/or disc were sent out to community councils on the 10th April 2014, prior to the consultation commencing and all documents were available within the Members lounges within the four Constituent Authorities.
- 5.3 In advance of the consultation all community councils and elected members were invited to a briefing in Perth or Dundee. 19 councillors/community council representatives in total attended these events.
- 5.4 Planning Aid Scotland assisted TAYplan in organising and running community drop-in events. 8 community drop-in events were organised with a combined total of 153 attendees (63 female and 90 male). Perth and Cupar were the most well attended events.
- 5.5 A variety of approaches and methods to engage with interested parties were utilised to raise awareness of the community drop-in events and consultation, these included: advertisements in the Courier and the Press and Journal, local press releases, radio, poster/leaflets, online and twitter. Stakeholder briefings including Community Councils and elected members were also used as methods of engagement along with the YEP! Youth Camp at the University of Abertay, primary schools and the Young Placemakers programme. This involved 70 young people.

Attendance at Events

5.6 On entering any TAYplan consultation event, the attendees were asked how they heard about the event and this was recorded. This feedback will assist in planning future consultation events. TAYplan will continue to promote our online registration which provides customers with direct mail and updates. Figure 1 overleaf shows the responses.

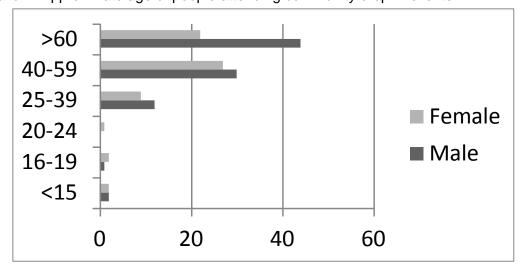
Figure 1: Responses to 'How did you hear about the event?'

Туре	Responses	Percent
Direct mail	30 responses	41 %
Newspaper *	12 responses	16 %
Poster	9 responses	12 %
Community Council / other local	8 responses	11 %
group	-	
Word of mouth	5 responses	7 %
School	3 responses	4 %
Online	3 responses	4 %
Twitter	2 responses	3 %
Radio	1 response	1 %

*mostly St. Andrews Courier

5.7 During all of the Main Issues Report public events, a record was maintained wherever possible of the age and gender of the attendees. The majority of the attendees were aged over 40 (80%) at the community drop-in events where 153 people attended. Figure 2 below shows the approximate age of people attending community drop-in events.

Figure 2: Approximate age of people attending community drop-in events.



Gender

63

Male
Female

Figure 3: Gender of people attending community drop-in events.

- In addition, to involve a younger section of the population and ensure that their voices were heard, engagement took place with a number of school pupils. 42 school pupils took part in the consultation in total. 21 of these young people attended Planning Aid Scotland's IMBY programme at 2 Perth Schools; Kinnoull Primary School and North Muirton Primary School. These 2 events were funded by Perth & Kinross Council. The remaining 21 attended Planning Aid Scotland's YEP! Youth Camp at the University of Abertay, Dundee with pupils from Arbroath Academy, Grove Academy, the High School of Dundee, Monifieth High, St. Paul's and Dundee Youth Council.
- 5.9 The Young Placemakers programme in partnership with Planning Aid Scotland also engaged a further 8 young people who each submitted their responses as part of a project. The Young Placemakers also helped to run the community drop-in events and the YEP! Youth Camp. They also got the opportunity to meet Derek Mackay MSP, the Minister for Local Government and Planning, during a day visit to the Scottish Parliament. The Young Placemakers projects covered a variety of topics, including: Climate Change; New Housing; Town Centres; and, Sustainable Transport.

6 MAIN ISSUES REPORT CONSULTATION – RESPONSES AND COMMENTS

Consultation Responses

6.1 The TAYplan Main Issues Report has generated interest amongst a variety of organisations and the general public. There were a total of 121 responses to the Main Issues Report, 8 responses to the Strategic Environmental Assessment and 1 response to the Equalities and Human Rights Impact Assessment. This was lower than the 2010 consultation where there were a total of 173 responses to the Main Issues Report, 26 responses to the Environmental Report and 10 responses to the Equalities Impact Assessment. Figure 4 overleaf illustrates the type of respondent to the Main Issues Report.

Trade Body
SDPA
Local Government
Land Owner/Operator/Developer
Individual
Government Agency
Community Council
Amenity Group

0 10 20 30 40 50

Figure 4: Type of Respondents

6.2 TAYplan officers were on hand in the closing weeks to help guide people through the process if required. Some written responses were also received. These were entered into the system by the TAYplan team.

Main Issue 1: Climate Change Resilience

- 6.3 47 respondents supported the inclusion in the next TAYplan of requirements for new buildings and places to be designed with 'greener' ways to manage temperature and water. It was noted that recognition should be given to tackling surface water issues but the positive effects of adaptation were also acknowledged.
- 6.4 It was considered that further detail would be needed in order to carry out the policy and the concept was questioned as to whether it should be dealt with at a strategic or local level.

Main Issue 2: Healthier Lives

- 6.5 38 respondents agreed with the inclusion of lifetime neighbourhoods in the place shaping policy. There was overall support for this principle and collaborative working to deliver it, a number suggesting it to be an excellent change to policy. The main points made were around mixed use development, environmental capacity, delivery and sustainable development.
- 6.6 45 respondents supported the principle of including new requirements to promote walking and cycling and health facilities which are easily accessible without a car. The main points made were around accessibility in rural areas, health and environment and delivery.

6.7 37 respondents supported the principle of promoting rail/ sea freight and freight distribution hubs. The main arguments were around recreation and economic growth and tourism.

Main Issue 3: First Choice to Invest

- 6.8 31 respondents agreed that TAYplan should identify areas of nationally and regionally important clusters for business, tourism and leisure. Support was given to the potential economic benefits clusters bring to the TAYplan area but further consideration should be given to the role housing plays in delivering sustainable locations.
- 6.9 10 respondents disagreed with the principle, suggesting that the current policy is adequate and the identification of clusters could be to the detriment of other areas.

Main Issue 4: Vibrant Town & City Centres

- 6.10 44 respondents supported the town centres first approach. These were from a variety of different sectors and supported the range of social, economic and environmental benefits which they considered to come with focusing high trip generating land uses in town centres ahead of other locations.
- 6.11 4 respondents did not support town centres first including some who were promoting specific non-town centre locations. There was also a recognition that some land uses are not always best situated in town centres.
- 6.12 29 respondents supported the approach to identify a network of town centres. These were from a variety of sectors and welcomed some of the potential opportunities for towns to define important niche roles for themselves.
- 6.13 5 respondents opposed the approach. Some were promoting specific sites and others considered this not to be a strategic issue.

Main Issue 5: Housing

Allocating housing land within local authorities boundaries

- 6.14 16 people agreed with Option 1 to increase from 10% share of housing land to allow Councils to shift between neighbouring housing market areas to respond to serious cases of environmental or infrastructure constraints. A number of respondents considered there to be a need for greater flexibility.
- 6.15 35 people agreed with Option 2 to retain the 10% share of housing land to allow Councils to shift between neighbouring housing market areas to respond to serious cases of environmental or infrastructure constraints. A number of respondents stated that ideally there would be no sharing between housing market areas, but accepted the retention of 10% for serious cases of environmental and infrastructure constraints.

Level of new housing to plan for

6.16 12 respondents preferred Option 1 (planning for 100% of need and demand in Angus/Dundee City/North Fife and 90% in Perth & Kinross). These were from a variety of different sectors. They favoured this approach on the basis that it would

reduce the need to develop greenfield land or they supported the arguments set out in the Main Issues Report and in particular the arguments around the transition from presently low to higher build rates.

6.17 41 respondents preferred Option 2 (Planning for 100% of need and demand in all four council areas). These were principally made up of builders/land owners as well as other sectors. There were several lines of argument ranging from disagreement with the points made in the Main Issues Report, to suggestions that all need and demand should be met, that there is 'too much land locked up in large sites, and that planning for higher levels of build will deliver choice. Some also considered Option 1 to be restrictive.

Accommodating need and demand for new homes in the 'Greater Dundee Housing Market Area'

- 6.18 22 respondents supported the proposal to meet most of the need in the small Perth & Kinross area within Dundee City. They were from a variety of different sectors and supported this based on the anticipated outcomes of reduced need to develop greenfield land and associated social, economic and environmental benefits.
- 6.19 12 respondents did not support this proposal. These were principally builders/land owners. Some argued there were limitations to land availability in Dundee City and others argued this would restrict growth. In all instances there were respondents who promoted their own sites.
- 6.20 People were also asked that in cases where housing land becomes no longer effective in parts of the Greater Dundee Housing Market Area that are outwith Dundee City, and where no appropriate alternative site(s) can be found then that housing should be built in Dundee City instead.
- 6.21 28 respondents supported this proposal. They welcomed the flexibility and supported the in principle social, economic and environmental outcomes. They also considered this to be a method of delivering the strategy.
- 6.22 12 respondents opposed this proposal. They argued that homes should be allowed in smaller settlements and that there is limited land availability in Dundee City.

Main Issue 6: Low Carbon Economy & Place

6.23 Planning for a low carbon economy and place involved finding out how TAYplan could reduce and shift demand for heat and power to low carbon sources. In response to the questions surrounding heat networks, 37 out of 41 respondents agreed that greater emphasis should be put on district heating and heating provided from renewable sources as a means of reducing carbon emissions, energy costs and meeting national renewable energy targets. However, concerns were raised surrounding the cost of infrastructure to accommodate district heating networks which could be significant along with the technologies being relatively new to this country. 34 out of 36 supported the inclusion of heat and power storage infrastructure within the definition of energy infrastructure.

- 6.24 26 out of 32 of respondents were also in agreement that TAYplan should take account of landscape capacity for wind farms in adjoining Council areas and seek to optimise landscape capacity. It was supported on the basis that council boundaries are administrative, not visible entities and therefore should always consider cross boundary implications. However, it was further highlighted the cross boundary and landscape implications of wind farms should be considered at the local level. Other comments raised related to the environmental implications of wind farms and the need to consider other technologies.
- 6.25 The question of whether TAYplan should consider the cumulative impacts of wind farms on regional assets such as the Highland Boundary Fault (HBF) and Coast was largely supported. 24 out of 29 supported the principle. Reference to a wind farm application refused for its impact on the HBF was made by a couple of respondents, who felt this justified its inclusion within the SDP. It was suggested this could inform decision making at the local level. However it was also raised that this issue has already been addressed through local authorities' landscape capacity studies.

Main Issue 7: Resource Security

- 6.26 Planning for resource security sought to ask the question whether TAYplan should consider a policy for unconventional gas as well as respond to any shortfalls in aggregates and safeguard minerals identified as 'at risk' within the British Geological survey. 22 out of 33 respondents agreed that TAYplan should include a policy to consider the extraction of Coal Bed Methane and Shale gas. It was expressed that a policy would provide a consistent approach among authorities and address concerns associated with environmental damage and safety. It was also raised that the policy could help protect the interests of local communities. However, those who did not express support for the principle felt this energy source would increase greenhouse gas and carbon emissions and this would not help promote and support renewable energy resources in line with current policy.
- 6.27 20 out of 22 agreed that TAYplan should seek to respond to the shortfall of construction aggregates and safeguard 'at risk' minerals. The need to safeguard Barite resources in Highland Perthshire was highlighted.

Main Issue 8: Green Networks

6.28 31 respondents agreed with Option 1 - focus on Strategic Development Areas, Perth and Dundee Core Areas and linking the Core Areas' green networks along the Carse of Gowrie. Option 1 was considered to be the more ambitious option and indicates commitment to green networks and has a greater opportunity to deliver multiple benefits. The main points made were around tourism, recreation and economic benefits, development delivery, habitats and wildlife, health and quality of life and transport. 7 respondents agreed with Option 2 - focusing only on the Strategic Development Areas.

Other Questions:

6.29 70 respondents believed that not everything was covered in the Main Issues Report. By selecting this option it allowed for the respondents to comment on what they believed to be missing. The responses broadly covered the following:

Vision & Outcomes

Responses raised some individual issues such as that further development of Carnoustie should be supported, identification of oil and gas pipeline and their safeguarding in the Plan, concern on the progress of Strategic Development Areas being developed, and no sites are identified for travelling people.

Potential Rail Stations

Transport Scotland requested that proposal for new rail stations identified in the Plan should be re-worded to reflect that further feasibility work is required and funding.

Housing Areas

Too much emphasis is placed on Dundee and Perth as economic drivers for development, with a number of individual sites being suggested.

Village Developments

Concern that village employment land is not enough to be sustainable and a number of greenfield housing sites were suggested.

Low Carbon

It was considered that TAYplan should adopt a Low Carbon Travel, Heat and Power region wide initiative, particularly in respect of public buildings.

• Developments in Green Belts

It was suggested that there is an opportunity to permit additional housing in small clusters in both the countryside and green belt areas.

Cupar North SDA

A total of 19 respondents opposed to the Cupar North Strategic Development Area. A range of reasons were set out for this opposition including school capacity, drainage, questioning whether a bypass is now required in the town, impact of retail park and visual impact.

New Developments

Various development proposals were suggested including a strategic scale proposal at Westfield, Forfar for over 1,000 homes and other uses.

Transport Issues

Issues were raised that some transport infrastructure needs upgrading beyond that proposed. The re-instatement of the St Andrews rail link was promoted.

Green Networks

Perth Green Belt is seen as a restriction and questioned consistency with Scottish Planning Policy.

Comments on the Environmental Report

- 6.30 In parallel with the Main Issues Report, a Strategic Environmental Assessment (SEA) was undertaken and an Environmental Report was published for consultation. The purpose of this assessment is to provide the consideration of the environment by ensuring that environmental issues are considered by decision makers alongside economic and social issues.
- 6.31 A total of 8 respondents commented on the Strategic Environmental Assessment. 9 questions were asked considering the Environmental Report. In terms of the responses to the questions, 8 of the respondents (100%) were satisfied that the Main Issues Report has identified most of the significant or important environmental problems affecting the TAYplan area with only minor changes suggested. There was overall agreement with the content and approach to TAYplan's Strategic Environmental Assessment. Some comments were made on how this could be further developed.

Comments on the Equalities Impact Assessment

- 6.32 An Equalities Impact Assessment was carried out to help ensure that TAYplan does not discriminate and that where possible TAYplan utilise opportunities to promote equality as well as other human rights and good relations between groups.
- 6.33 There was only 1 respondent to the Equalities Impact Assessment. This comment suggested that more consideration should be given to Gypsy and Travelling communities within the TAYplan area.

7 CONSULTATIONS

7.1 The Treasurer and Clerk to TAYplan, the Director of Communities Directorate, Angus Council, The Director of City Development, Dundee City Council, Executive Director of Environment, Enterprise and Communities, Fife Council and the Executive Director (Environment), Perth & Kinross Council have been consulted and are in agreement with the contents of this report.

8 BACKGROUND PAPERS

- 8.1 Circular 6/2013: Development Planning, Scottish Government (http://www.scotland.gov.uk/Resource/0044/00441577.pdf)
- 8.2 Planning etc. (Scotland) Act 2006 (http://www.legislation.gov.uk/asp/2006/17/pdfs/asp_20060017_en.pdf)
- 8.3 Town and Country Planning (Scotland) Act 1997 (http://www.scotland.gov.uk/Publications/2005/01/20576/50663
- Town & Country Planning (Development Planning) (Scotland) Regulations 2008 (http://www.legislation.gov.uk/ssi/2008/426/contents/made

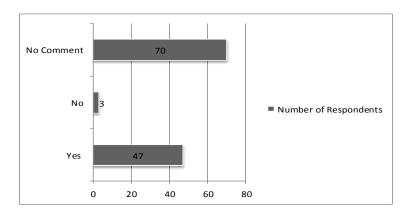
Pamela Ewen

TAYplan Strategic Development Plan Authority Manager 1st October 2014

Responses to the Main Issues Report Questions

Main Issue 1: How to be resilient to a Changing Climate

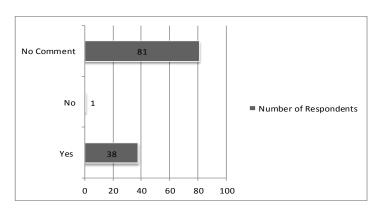
Question 1: Do you support the inclusion in the next TAYplan of requirements for new buildings and places to be designed with 'greener' ways to manage temperature and water?



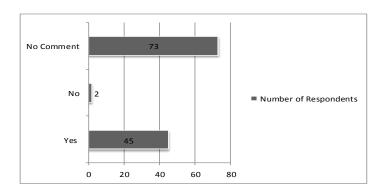
Main Issue 2: Planning to enable people to live healthier lives

Question 2: Do you support changes to policy about place shaping in the next TAYplan to include the following:

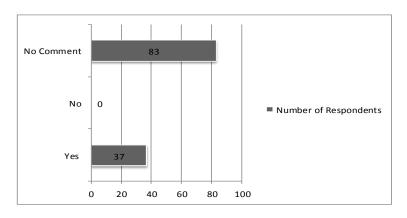
A: The role of lifetime neighbourhoods?



B: Include new requirements to promote walking and cycling and health facilities which are easily accessible without a car?

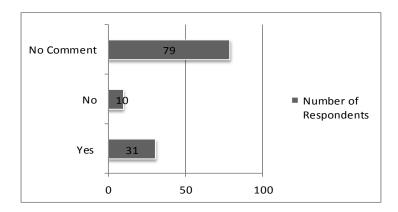


C: Promote rail/sea freight and freight distribution hubs?



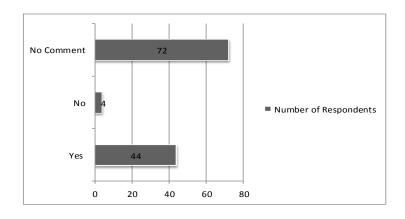
Main Issue 3: Making TAYplan a place of first choice to invest

Question 3: Do you think that the next TAYplan should identify areas of nationally and regionally important clusters for business, tourism and leisure as suggested by the Scottish Government?

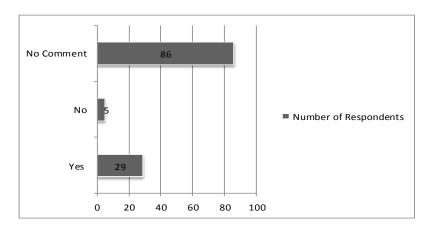


Main Issue 4: Planning for vibrant town and city centres

Question 4: Do you support changes to the next TAYplan that promote town centres as the first choice for high trip generating uses such as shopping, business, civic activity. Community uses, events and markets?

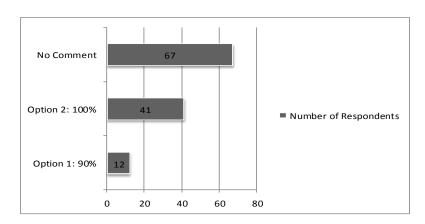


Question 5: Do you support changes to the next TAYplan that identify a network of Town Centres with different sizes and functions in the TAYplan area?

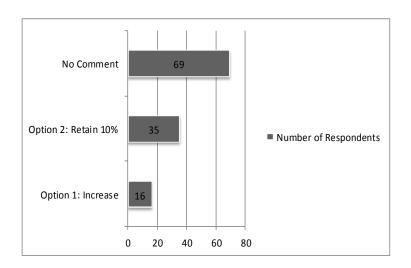


Main Issue 5: How to plan for homes for people to live in

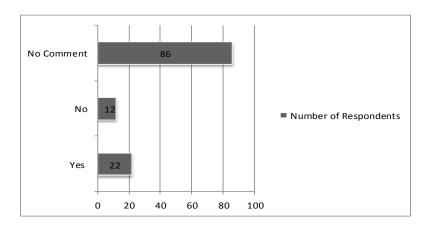
Question 6: How much future estimated housing need and demand should the next TAYplan aim to plan for?



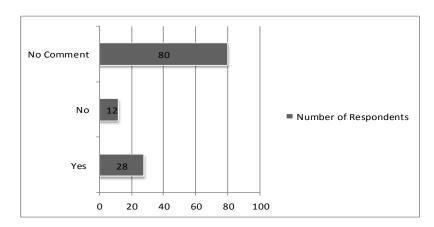
Question 7: What share of housing land should the next TAYplan allow Councils to shift between neighbouring housing market areas to respond to serious cases of environmental or infrastructure constraints?



Question 8: Within the relatively small areas of Perth & Kinross that lies within the Greater Dundee Housing Market Area should the next TAYplan plan for most of the identified need for new homes in this area to be built in neighbouring Dundee City instead?



Question 9: If housing land in the Greater Dundee Housing Market Area becomes non-effective and appropriate alternative site (s) cannot be found should the next TAYplan provide for the additional homes to be built in Dundee City instead?

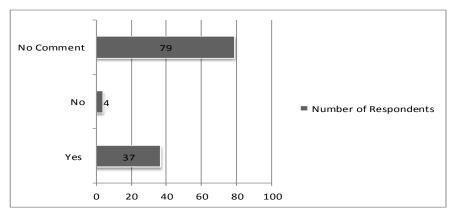


Main Issue 6: Planning for a low carbon economy and place

Question 10: Do you agree that the next TAYplan should help to reduce and to shift demand for heat and power to low carbon sources by:

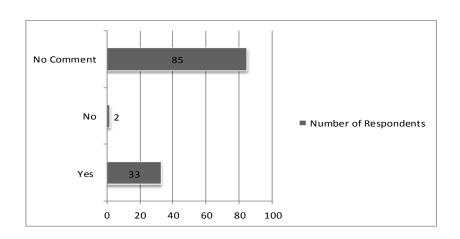
A: Placing greater emphasis on district heating networks to maximise the use of heat produced waste



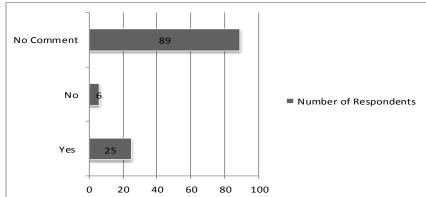


processing, surplus heat producers and renewable energy?

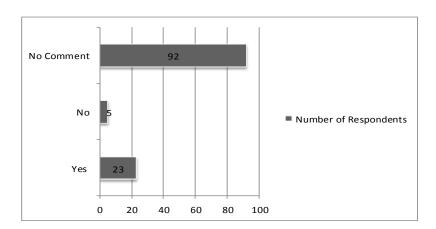
B: Adding heat and power storage infrastructure to the definition of energy infrastructure.



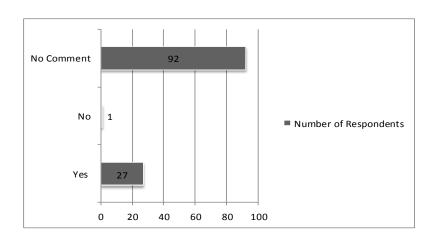
C: Taking account of landscape capacity for wind farms in adjoining Council areas and seek to optimise landscape capacity?



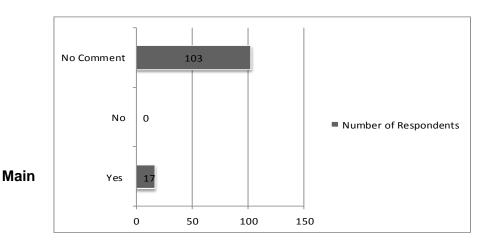
D: Expanding the approved policy to consider the cumulative impact on regionally important assets e.g. the coast and the highland boundary fault?



E: Providing greater emphasis in policy that landscape and/ or related studies are compatible across Council boundaries in the consideration given to national/ regional assets?

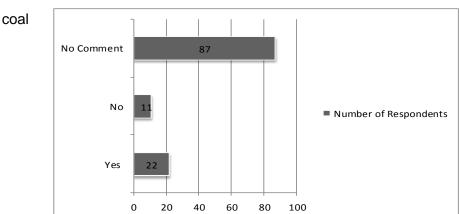


Question 11: Beyond those identified on the map on page 41 are there other opportunities for heat networks and district heating?

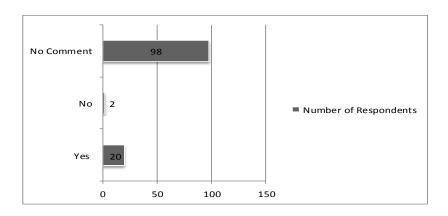


Issue 7: Planning for resource security

Question 12: Do you think the next TAYplan should include a policy to consider the
extraction of
shale gas and
bed methane?

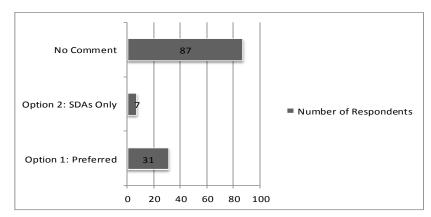


Question 13: Do you agree with the approach for the next TAYplan to amend existing policy to respond to any shortfall in construction aggregates and/ or to safeguard deposits of minerals identified on the British Geological Survey's Risk List?



Main Issue 8: Planning for multi-functional green networks to be enhanced

Question 14: In order to provide for strategic green networks which option do you think should be included in the next TAYplan?



Have

Question 15:Thinking about the vision and outcomes and the eight main issues in the Main Issues Report; have these covered everything that you think needs to be addressed for the next TAYplan?

we missed anything?

