

<b>Issue (ref and heading):</b>	Issue 005: Policy 1C Location Priorities – Outside of Principal Settlements and Settlement Boundaries	
<b>Development plan reference:</b>	Policy 1C, Map 1 and supporting text pages 10 and 13	<b>Reporter:</b> [DPEA Use Only]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p><b>Seeking a change</b>  Colliers International for The Gleneagles Hotel (909368)  Emac Planning LLP for A&amp;J Stephen Ltd &amp; Avant Homes (910368)  Emac Planning LLP for Delson Contracts Ltd (846826)  Emac Planning LLP for F M &amp; G Batchelor (846821)  Emac Planning LLP for J G Lang &amp; Son (846827)  Emac Planning LLP for Landvest PCC Ltd (910292)  Emac Planning LLP for Linlathen Estates (Tayside) Ltd &amp; James Keiller Estates Ltd (846825)  Emac Planning LLP for R Watson &amp; Son (846824)  Emac Planning LLP for Scotia Homes Ltd (910294)</p>	<p>Emac Planning LLP for Stewart Milne Homes North Scotland (347277)  Homes For Scotland (785148)  Savills-SmithsGore for Scone Estate (909972)  Scottish Government (910172)</p> <p><b>Supporting as written</b>  Dundee Civic Trust (845127)  Gladman Developments Ltd (846254)  NHS Tayside (908896)  Scottish Environment Protection Agency (835401)  Scottish Water (762198)  Sportscotland (905989) SEStran Regional Transport Partnership (908118)  Tactran Regional Transport Partnership (441235)</p>	
<b>Provision of the development plan to which the issue relates:</b>		
<p>The majority of new development will be concentrated in the principal settlements, named in Policy 1 and Map 1, ahead of other locations. Policy 1C sets out the circumstances in which development may take place outside of principal settlements and this works in conjunction with Policy 4F. Settlement boundaries are defined in Local Development Plans and this is described in the text on page 13.</p>		
<b>Planning Authority's summary of the representation(s):</b>		
<p><b>Summary of Representations Seeking a change</b></p> <p><b><u>SETTLEMENT BOUNDARIES</u></b></p> <p><b>Emac Planning LLP for A&amp;J Stephen Ltd &amp; Avant Homes (910368) PLAN2015_549, 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 &amp; G Batchelor (846821) PLAN2015_490, Emac Planning LLP for R Watson &amp; Son (846824) PLAN2015_461, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015_399, Emac Planning LLP for Linlathen Estates (Tayside) Ltd &amp; James Keiller Estates Ltd (846825) PLAN2015_412, Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_529, Emac Planning LLP for J G Lang &amp; Son (846827) PLAN2015_438, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015_477 and Homes For Scotland (785148) PLAN2015_236</b> consider the current text in the 'how this policy works' section on page 13 (Doc80) to be 'misleading with regard to reviewing settlement boundaries'. They propose a requirement for Local Development Plan Main Issues Reports to review settlement boundaries as they consider that this 'does not take place as a matter of course'. They propose amendments that would result in a requirement that development options for all settlements should be explored in the Main Issues Report for each Local Development Plan.</p>		

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368)**

**PLAN2015\_549** and **Homes For Scotland (785148) PLAN2015\_236** propose changes to require Main Issues Reports for Local Development Plans to 'fully consider options for housing and other development in all tier 1 to 3 principal settlements'. They also propose that where no or limited sustainable development opportunities exist then [settlement] development boundaries should be reviewed. They suggest as an example that Angus Council 'chose not to consider the allocation of land in or adjacent to Birkhill/Muirhead' when preparing their Local Development Plan. They suggest that this meant no land was allocated there. They consider that if a settlement is identified in a settlement hierarchy then it ought to be expected to accommodate growth.

**Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_399** suggest there is a need for the review of settlement boundaries to be explored for other settlements [not principal settlements] and villages and brownfield sites. The respondent is promoting Crail Airfield as a development location which they consider to be of historic and strategic importance.

**CHANGE WORDING FROM 'MAY' TO 'SHOULD'**

**Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_415, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_439, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_462, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_401 and Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_491** propose changes to Policy 1C to alter the word 'may' to 'should' so that it 'more positively' promotes development in locations outside of principal settlements. They consider that this would provide greater choice of housing sites, a sustainable pattern of development and would reflect the requirements of Scottish Planning Policy (2014) paragraphs 40, 110 and 119 (Doc84).

**Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_415** also consider that this should take place whilst promoting brownfield and regeneration.

**CRAIL AIRFIELD AND POLICY 1C**

**Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_401** suggests that the proposed plan ignores sites such as Crail Airfield and proposes additional policy text which they suggest would resolve this issue.

**Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_402** considers that the 'policy omission' of Crail Airfield in the Strategic Development Plan fails to address the future strategic development of a site, which they consider to be of national historical and planning policy importance. They propose that Policy 1 should clearly say that development 'can and should' take place outwith the Principal Settlements where this reflects Scottish Planning Policy (2014) paragraph 40 (Doc84) for promoting a sustainable pattern of development using a site specific policy. The respondent also considers that reuse of this site is consistent with Scottish Planning Policy (2014) paragraph 80 (Doc84).

The respondent considers there to be a 'strategic policy vacuum' since the previous Fife Structure Plan (2009) included Policy BL1 (Doc44) which covered rural brownfield sites. The respondent considers that TAYplan should identify the airfield's 'ability to contribute to future housing requirements'. The respondent considers development on the site to be consistent with Policy 1B sequential approach.

## **NEW CRITERIA FOR POLICY 1C**

### **Colliers International for The Gleneagles Hotel (909368) PLAN2015\_498**

proposes additional text for Policy 1C to require assessment of how proposals in the countryside contribute to sustainable economic growth and resilience. The respondent considers that this will strengthen the overall policy, take account of the important role development in the countryside can play in the context of economic and tourism growth, and be in line with the thrust of Scottish Planning Policy (2014) (Doc84).

**Savills-SmithsGore for Scone Estate (909972) PLAN2015\_466** proposes changes to Policy 1C on the basis that, as currently written, it suggests that the countryside or villages are 'inherently unsustainable' as locations for housing and that this causes 'suburbanisation of the countryside'. They consider that Scottish Planning Policy (2014) paragraph 79 (Doc84) provides examples of suitable development for the countryside that they suggest would not constitute 'suburbanisation of the countryside' or lead to 'unsustainable travel patterns'. They also consider that some of these examples are restricted by greenbelts and that 'small scale' housing development could support the implementation of Policy 8 Green Networks (Doc80).

## **STRENGTHEN READ ACROSS WITH SCOTTISH PLANNING POLICY (2014)**

**Scottish Government (910172) PLAN2015\_331** proposes amendments to the text on page 13 (Doc80) which describes varying approaches to development in rural areas. Although supportive of the statement the amendments sought are to clarify what is meant by 'a varied approach' and to link the statement directly with Scottish Planning Policy (2014) (Doc84).

## **Summary of Supporting Representations**

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

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

**NHS Tayside (908896) PLAN2015\_322** support this as a continuation to 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 'best use of resources and infrastructure capitalising on investment, skills and strategic infrastructure'. They argue though that Angus Council has granted some planning permissions which they consider to be contrary to the Plan. They question what powers TAYplan has to ensure the plan is adhered to and consider that a single authority should be responsible for the wider Dundee area.

**sportscotland (905989) PLAN2015\_4** support the approach with regard to sport and recreation e.g. access to water rather than a complete ban.

**Gladman Developments Ltd (846254) PLAN2015\_373** supports development being able to take place in settlements that are not principal settlements which they argue is 'vital to support sustainable economic growth and the viability of local services and facilities'.

**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.

**Modifications sought by those submitting representations:**

**SETTLEMENT BOUNDARIES**

**Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_512, Emac Planning LLP for J G Lang & Son (846827) 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 Stewart Milne Homes North Scotland (347277) PLAN2015\_529, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015\_511, Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015\_477 and Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_412,** 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 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."

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368)**

**PLAN2015\_549** propose an additional paragraph to the 'how this policy works' on page 13 to read:

'Local Development Plan Main Issues Reports shall 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 shall be given to reviewing those development boundaries to facilitate the numerical requirements of Policy 4: Homes.'

**Homes For Scotland (785148) PLAN2015\_236** propose an additional paragraph to the 'how this policy works' on page 13 to read:

'Local Development Plan Main Issues Reports should consider options for housing and other development in all Tier 1 to 3 principle settlements. Consideration should be given to reviewing development boundaries where this is necessitated by there being no or limited sustainable development opportunities remaining within existing settlement boundaries.'

**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, but not all of development in the region's principal settlements as shown on Map 1 (opposite). 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."

### **CHANGE WORDING FROM 'MAY' TO 'SHOULD'**

**Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_415, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_439, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_462 and Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_491** propose amendments so that Policy 1C first sentence reads: 'Local Development Plans are encouraged to also provide for some development in settlements that are not defined as principal settlements (Policy 1A).'

### **CRAIL AIRFIELD AND POLICY 1C**

**Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_401** propose amendments so that Policy 1C first sentence reads: 'Local Development Plans are encouraged to also provide for some development in settlements that are not defined as principal settlements (Policy 1A). In addition, the redevelopment of Crail Airfield for mixed use development will also be encouraged.'

**Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_402** propose the addition of a new a new section entitled Policy 1E Crail Airfield to read as follows:

#### **'E. Crail Airfield**

The redevelopment of Crail Airfield for mixed use development will also be encouraged.'

### **NEW CRITERIA FOR POLICY 1C**

**Colliers International for The Gleneagles Hotel (909368) PLAN2015\_498** propose amendments to Policy 1C so that it reads:

'Local Development Plans may also provide for some development in settlements that are not defined as principal settlements (Policy 1A). This is provided that it can be accommodated and supported by the settlement, and in the countryside; that the development genuinely contributes to the outcomes of this Plan; and, it meets specific local needs or does not undermine regeneration of the cities or respective settlement. Proposals for development in the countryside should be assessed against the need to avoid suburbanisation of the countryside and unsustainable patterns of travel and development however any assessment of such should take full account of the proposal's ability to contribute to sustainable economic growth and resilience.'•

**Savills-SmithsGore for Scone Estate (909972) PLAN2015\_466** proposes that Policy 1C should be changed to state: - Local Development Plans may also provide for some development in settlements that are not defined as principal settlements (Policy 1A). This is provided that it can be accommodated and supported in settlements or in the countryside. •

### **STRENGTHEN READ ACROSS WITH SCOTTISH PLANNING POLICY (2014)**

**Scottish Government (910172) PLAN2015\_331** proposes that the following text should be added at the end of paragraph six on page 13:

'...in accordance with the different types of rural area and approaches to rural development outlined in the Scottish Planning Policy.'

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

#### **Context**

Proposed Plan (2015) Policy 1 (Doc80) is almost identical to Approved TAYplan (2012) Policy 1 (Doc16) and the emphasis and intent has not changed. Changes have been made to clarify what is meant by 'core areas' and also to explain development outside of principal settlements. Proposed Plan (2015) Policy 1 Part C (Doc80) covers development outside of principal settlements. This continues the

approach set out in approved TAYplan (2012) Policy 1 Part A (Doc16) which covers this.

Some amendments have been made to break the text into smaller sentences to make it more understandable and easy to follow for readers. These changes do not alter the meaning of the Policy.

- The words ‘...in rural areas...’ have been changed to ‘...in the countryside...’ This is because ‘rural areas’ is also not defined anywhere else in the Plan and can have a specific meaning. Similarly not all of the countryside is defined as rural areas.
- The word ‘objectives’ has been replaced by the word ‘outcomes’. This is because the Proposed Plan (2015) does not state objectives and instead encapsulates these within policies and within the outcomes set out as part of the vision. The outcomes are described on page 8 (Doc80).
- The phrase from approved TAYplan (2012) Policy 1 (Doc16) ‘...or supports regeneration of the local economy.’ has been replaced by the phrase ‘...or does not undermine regeneration of the cities or respective settlement.’ The words ‘local economy’ and the context within which it had been used is now considered to be too vague and potentially confusing.
- The final sentence of Proposed Plan (2015) Policy 1 Part C (Doc80) is new and is specifically added to reinforce the position taken in the earlier part of the policy. It is also clarifying the purpose and linking it specifically with Scottish Planning Policy (2014) paragraphs 76 to 83 (Doc84) by using the identical terminology.
- The new wording set out in the Proposed Plan (2015) Policy 1 Part C (Doc80) is clearer and more explicitly relates to the terminology in Proposed Plan (2015) Policy 4 Part F (Doc80) which works in conjunction with this policy.

The meaning of the policy has not changed. Instead the amendments clarify the role of principal settlements (and by default areas that are not principal settlements). This responds to some uncertainties amongst practitioners about how this applied.

The Main Issues Report (2014) page 56 (Doc56) makes clear TAYplan’s intention to retain the current approach but to clarify that the boundaries of principal settlements are defined in Local Development Plans. This is presented in the ‘how the policy works’ section on page 13 (Doc80).

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

### **SETTLEMENT BOUNDARIES**

Several of these respondents seek related changes in the Summary of Unresolved Issues for Issue 003 Policy 1A Settlement Hierarchy – Policy Principle.

**Emac Planning LLP for A&J Stephen Ltd & Avant Homes (910368)  
PLAN2015\_549, 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, Emac Planning LLP for Stewart Milne  
Homes North Scotland (347277) PLAN2015\_529, Emac Planning LLP for Scotia  
Homes Ltd (910294) PLAN2015\_477 and Homes For Scotland (785148)  
PLAN2015\_236**

TAYplan does not agree that the current text in the ‘how this policy works’ section on page 13 (Doc80) is ‘misleading’ with regard to reviewing settlement boundaries. This text was added to make clear to users of the Plan that, although TAYplan defines the

principal settlements, it is for the respective Local Development Plan to define their boundaries. Although this is also the case in the approved TAYplan (2012) Policy 1 (Doc16) it was clear from telephone discussions that some plan users would find it helpful to make these points more clearly.

TAYplan does not agree with the view that settlement boundaries are 'not reviewed in Local Development Plan Main Issues Reports as a matter of course'. For example both Angus Council (Doc13) and Fife Council (Doc42) explored potential growth options and the potential locations for this at their respective Main Issues Report stage.

Fife Council provided an additional stage (Doc38) to this process to support stakeholders prior to publication of their proposed plan. Angus Council, through their work, concluded that amendments to the settlement boundaries of Arbroath, Forfar, Kirriemuir, Monifieth and Montrose as well as Edzell, Friockheim, Letham and Newtyle were appropriate. The specific direction, locations and scale of growth and their implications for settlement boundaries are best considered through the Local Development Plan process. It is entirely proportionate and appropriate within the context of Policy 1 (Doc80) to conclude that there is no additional need to consider growth that may affect the settlement boundary in other settlements.

TAYplan is also not persuaded that the proposed amendments are appropriate or necessary. As written the amendments imply that Local Development Plan Main Issues Reports should focus their attention on the boundaries of all settlements (not just principal settlements) and review the boundaries. There is also an implication that where an authority has decided not to amend a boundary that this constitutes a failure in the process. TAYplan does not share this view.

Firstly, Policy 1 already establishes a clear framework for considering land release in locations that are not in principal settlements through Policy 1 Part B and Part C. This approach remains the same as the one set out in approved TAYplan (2012) (Doc16) albeit that Part C has been amended slightly to reflect Scottish Planning Policy (2014) paragraphs 40 and 76 to 83 (Doc84) and to offer greater clarity.

Secondly, TAYplan considers that any decision by a Council to review and subsequently amend a settlement boundary should be driven by planning issues and not a blanket requirement to review all boundaries as a matter of course. TAYplan does not consider there to be value in using Main Issues Reports to examine every settlement boundary. This is because not every settlement will be expected to accommodate development that would lead to such a requirement and the sheer number of settlements in Angus, Fife and Perth & Kinross would make their Main Issues Reports extremely cumbersome.

TAYplan therefore remains satisfied that Policy 1C provides the appropriate framework for where development may take place outside of principal settlements and this works in conjunction with the rest of Policy 1 and other policies in the Proposed Plan (2015).

**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**

TAYplan does not agree with the assertion that Angus and Fife Councils have not considered settlement boundaries in the preparation of their respective Local Development Plans. The respondents have provided no evidence to substantiate this.

As noted above both councils used their Main Issues Reports to consider possible locations for growth around their principal settlements and have also proposed locations for growth in some of their larger non-principal settlements. It seems entirely logical and proportionate for Councils to use their Main Issues Reports to explore the issues and possible options and to determine whether there is then a need to review boundaries. As such TAYplan is not persuaded that any compelling case has been made for the proposed amendments.

**Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_399**

TAYplan's response is covered overleaf under the section relating to Crail Airfield.

**CHANGE WORDING FROM 'MAY' TO 'SHOULD'**

**Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015\_415, Emac Planning LLP for J G Lang & Son (846827) PLAN2015\_439, Emac Planning LLP for R Watson & Son (846824) PLAN2015\_462 and Emac Planning LLP for F M & G Batchelor (846821) PLAN2015\_491**

Policy 1C is designed to recognise that principal settlements will not be the only place where 'development', as defined in law (Doc80) can take place. But it is also designed to ensure that in these circumstances it is not to the detriment of the vision or the strategy designed to deliver it.

Although Policy 1C (Doc80) allows some development outside of principal settlements, the policy onus is on the proponent to justify their development rather than upon the Council to justify why it should not take place. TAYplan does not agree that the word 'may' should be replaced in Policy 1C first sentence. The word 'may' indicates that the option is open to Local Development Plans in response to the issues they face. The word 'should' requires them to do so irrespective of the issues or to justify why they have not done so. The word 'encourage' also pushes Councils along a similar route.

The purpose of the proposed changes appears to be that more development can take place in locations outside of principal settlements. This is not necessarily beneficial for delivering the vision. Policy 1C already provides for these circumstances as written and thus the outcomes sought by the respondents can already occur, provided the stated criteria are met and also that there is no other option having first explored all potential options under the sequential approach in Policy 1B (Doc80).

The consequence of the proposed changes would be to weaken the existing approach shifting away from a principal settlement focus. The original basis for this is that principal settlements are where most of the existing people, jobs, services, infrastructure and facilities are already concentrated. Focusing the majority of new development in these locations brings people closer to jobs and services. It also brings businesses closer together. This optimises the opportunities for use of active and passenger transport and promotes access. It reduces the need to travel which has an impact on health and carbon emissions. It also contributes to reducing pressure on the countryside. These factors have not changed and continue to sit well with the vision and outcomes (See Topic Paper 1: Vision and Outcomes 2015 – Doc103).

TAYplan is not persuaded that these proposed changes would support the vision better than what is presently written in Policy 1C and has concerns that these proposed changes would fundamentally shift the emphasis of Policy 1 away from principal settlements to the detriment of the vision and other elements policies of the Proposed Plan (2015) (Doc80).

## **CRAIL AIRFIELD AND POLICY 1C**

**Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_401 and PLAN2015\_402 and also Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015\_399 from above.**

The respondent has sought several changes to Policy 1 (Doc80) in these representations and also those covered in the Schedule 4 Summaries of Unresolved Issues for Issues 003 Policy 1A Settlement Hierarchy – Policy Principal and 004 Policy 1B Sequential Approach.

This series of changes seek to bring about specific recognition for Crail Airfield and to amend Policy 1 to specifically enable development to take place there. Although the proposed changes may deliver what the respondent seeks, no justification has been provided which supports this or which explains how this better delivers the vision.

TAYplan does not agree with the premise that redevelopment of Crail Airfield as a 'new, sustainable, mixed use settlement' will 'complement the Principal Settlement Hierarchy'. Crail Airfield is not part of a principal settlement or a non-principal settlement; it is also not a Strategic Development Area. It is a rural site outside of any settlement. Policy 1B sequential approach is clear that brownfield or greenfield land outside of principal settlements is the lowest priority for development. Policy 1C provides appropriate criteria to enable developers and planning authorities to consider whether proposals for development outside of principal settlements are appropriate. The fact that this site is brownfield does not automatically make it suitable for new development, including residential uses. No compelling evidence has been provided by the respondent to explain how the redevelopment of this site would be better placed to deliver the vision than other locations which are within settlements (principal or non-principal) and/or Strategic Development Areas.

For clarity the Fife Structure Plan (2009) was replaced in the TAYplan area on 8 June 2012 when the Scottish Ministers approved the TAYplan Strategic Development Plan (2012) (Doc16). Although the Fife Structure Plan (2009) supporting text may have specifically referenced Crail Airfield, TAYplan does not consider there to be any strategic policy vacuum, as implied by the respondent. Policy 1 is clear through Parts 1A, 1B and 1C (Doc80) about the priorities for land release and the framework for Local Development Plans to identify land. Policy 4 (Doc80) is clear about the housing land requirement and Policy 3 (Doc80) is clear what sites are (and by default which are not) Strategic Development Areas.

The respondent refers to Fife Structure Plan (2009) Policy BL1 (Doc44) which considered the re-use of brownfield land. However, the policy did not specifically name Crail Airfield and this was instead referenced in the supporting text under paragraph 3.4 (Doc44). This paragraph recognised that the most appropriate re-use of significant areas of derelict land in the countryside would be rehabilitation to agriculture, woodland, countryside recreation and nature conservation. However it recognised that land uses including leisure and tourism may be appropriate at other significant sites such as Crail Airfield, however this would exclude large-scale housing. This position appears to differ from the inference by the respondent that Crail Airfield was identified in the Fife Structure Plan (2009) and that it would make a significant contribution to the housing land supply. The more recent Adopted St Andrews and East Fife Local Plan (2012) pages 111 and 112 (Doc6) also identify Crail Airfield as an area of mixed use that may include limited housing development. This refers to the importance of securing the restoration and re-use of built heritage of the site.

The respondent is correct that Crail Airfield is within the St Andrews and East Fife Housing Market Area. It is important to make clear that the Proposed FIFEplan

Examination Version (2015) (Doc79) is planning for 210 homes per year based on approved TAYplan (2012) Policy 5 (Doc16). The Proposed FIFEplan (2015) (Doc79) has identified sufficient housing land to support this and followed the approach in the approved TAYplan (2012) (Doc16) to ensure a generous supply of land which is higher than the 210 homes per year. This is equivalent to the housing land requirement approach of Scottish Planning Policy (2014) paragraph 116 (Doc84) but pre-dates its operation.

The housing supply targets and land requirement set out in Proposed Plan (2015) Policy 4/Map 4 (Doc80) are lower than the 210 homes per year. This suggests that the subsequent FIFEplan may therefore already have a considerable share of the land needed to support the delivery of this plan. As such it would need to consider whether Crail Airfield, and other sites (including those already identified), offer the best opportunities to deliver the TAYplan vision (Doc80) and indeed the intentions for a sustainable pattern of development set out in in Policy 1 (Doc80) Scottish Planning Policy (2014) paragraphs 40 and 76 to 83 (Doc84).

The respondent has provided no evidence to justify why possibly 400 to 500 new homes would be best accommodated in a countryside location and why Crail Airfield in particular fulfils such a need. Given the points made above it is unclear what role Crail Airfield would play in meeting identified need and demand for new homes that would justify such a significant modification to and departure from current policy.

TAYplan is not persuaded Crail Airfield could automatically deliver the consequences of Scottish Planning Policy (2014) paragraphs 40 (Doc84) as suggested by the respondent. Paragraph 40 (Doc84) does refer to prioritising brownfield land ahead of greenfield. However, when read as a whole it is difficult to conclude how a location which is not part of any existing settlement (whether brownfield or not) could contribute to the other criteria in Paragraph 40 (Doc84) better than locations which are part of existing principal settlements (or indeed non-principal settlements). Policy 1, as currently written, therefore reflects the priorities of Scottish Planning Policy (2014) paragraph 40 and also 76 to 83 (Doc84) appropriately. TAYplan does not agree with the respondent that their proposed changes better contribute to achieving the intentions of Scottish Planning Policy (2014) paragraph 40 (Doc84).

TAYplan is not persuaded that Policy 1 (Doc80) is where such an amendment would sit. There is no need to use a Policy designed to describe development patterns (Policy 1) to highlight one individual site, particularly when its contribution towards that strategy may be questionable. Any details regarding strategic scale sites are covered by Policy 3 (Doc80) which covers Strategic Development Areas.

To be clear, and as noted by the respondent, Crail Airfield is not a Strategic Development Area. No proposals were received regarding this at Pre-Main Issues (2013) or Main Issues Report (2014) stages. Topic Paper 2 Growth (2015) pages 52 to 93 (005/SL/Doc18) consider all proposed and current Strategic Development Areas and concludes that there is no need to remove or amend the current ones or to add any new ones. Strategic Development Areas have been considered in more detail in the Schedule 4 Summary of Unresolved Issues for Issue 010 Policy 3D Strategic Development Areas.

The changes proposed above (and those sought in the Schedule 4 Summary of Unresolved Issues for Issues 004 Policy 1B sequential Approach) would fundamentally weaken the Plan. This is because there are numerous other large sites, including former airfields, whose promoters could use the same precedent to argue for equivalent development on the same basis. The result would be wide-scale development of homes and other land uses in countryside locations whose inhabitants would have to travel to access jobs, services and facilities. This would

fundamentally fail to deliver Policy 1 as currently written and be contrary to the vision.

TAYplan is therefore not persuaded that there is a policy vacuum or any compelling evidence to include the changes proposed.

TAYplan is also not persuaded that either the proposed changes (above) or the part of the Plan to which they are proposed are either appropriate or necessary. TAYplan considers that these proposed changes would undermine the Proposed Plan (2015) and delivery of the vision. TAYplan therefore proposes to make no change.

### **NEW CRITERIA FOR POLICY 1C**

#### **Colliers International for The Gleneagles Hotel (909368) PLAN2015\_498**

TAYplan does not consider that the proposed changes bring any additional clarity to the Proposed Plan or that they would bring about the outcomes sought by the respondent. TAYplan is satisfied that Policy 1C (Doc80) is already appropriately written and that this and Policies 2 and 9 (Doc80) are appropriate to bring about what is being sought by the respondent.

#### **Savills-SmithsGore for Scone Estate (909972) PLAN2015\_466**

To be clear the current approach in Policy 1 does not suggest that locations outside of principal settlements are unsustainable, but it does recognise that locations within principal settlements are the most sustainable. Given that there is a very clear strategic focus on principal settlements to deliver the vision it is also necessary to recognise that some development will take place outside of these areas. Policy 1C sets out the approach for this and works in conjunction with Policy 4F (and also Policies 2 and 9) (Doc80).

Policy 1 balances the realities that development pressures from the larger settlements can affect wider areas and that it is important to ensure that these needs are met within those largest settlements. This approach is designed to ensure small settlements are sustained whilst also not being subject to the sometimes adverse outcomes of development related to nearby principal settlements. Such an approach is in the best interests of a living, working countryside and vibrant rural areas.

### **STRENGTHEN READ ACROSS WITH SCOTTISH PLANNING POLICY (2014)**

#### **Scottish Government (910172) PLAN2015\_331**

TAYplan understands the rationale for the proposed changes but is satisfied that the current language is adequate and clear. Any choice to add the proposed wording would not interfere with the plan but TAYplan considers that it would un-necessarily repeat Scottish Planning Policy. This is something TAYplan has tried to avoid and has only done where it is contextually necessary for clarity and/or the operation of the plan. Therefore TAYplan does not propose to make this proposed change.

### **Authority's Response to Supporting Representations**

**Dundee Civic Trust (845127) PLAN2015\_279, Scottish Water (762198) PLAN2015\_266, Scottish Environment Protection Agency (835401) PLAN2015\_193 NHS Tayside (908896), PLAN2015\_322, Tactran Regional Transport Partnership (441235) PLAN2015\_357, SEStran Regional Transport Partnership (908118) PLAN2015\_33 and Gladman Developments Ltd (846254) PLAN2015\_373**

TAYplan welcomes the support for this policy.

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

There is no legal or operational role for TAYplan to comment on planning applications. This is done by the respective Councils as determining authorities.

Council boundaries are a matter for the Scottish Government and the appropriate public bodies who oversee such matters.

**sportscotland (905989) PLAN2015\_4**

TAYplan welcomes the support for the policy and agrees that Policy 1 does not prevent development outside of principal settlements, including those types referred to by the respondent. This does not mean, however, that such developments are automatically appropriate since they must also conform to other policies in the Proposed Plan and those of the respective Local Development Plan.

**CONCLUSIONS**

Proposed Plan (2015) Policy 1 is a continuation of the Policy 1 in the approved TAYplan (2012). No changes, besides enhanced explanation, were proposed at Main Issues Report stage because this strategy is directly designed to deliver the vision, which is not proposed to change.

TAYplan does not consider that any compelling evidence has been provided to justify the proposed changes.

Although these proposed changes appear to be incremental and minor on the surface their impact would fundamentally and significantly undermine the entire basis of the Plan and thereby the delivery of the vision. The current balance remains appropriate and subject to the minor comments above neither Scottish Government nor any key government agencies have sought changes to the purpose or operation of this policy.

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