

Issue (ref and heading):	007: Policy 2d: Shaping Better Quality Places – Efficient Resource Consumption	
Development plan reference:	Policy 2D Page 14	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
Seeking a change 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) Sustrans (346798) Supporting as written Dundee Civic Trust (845127) Friends of the Earth Tayside (845935) Mr David Wardrop for Headon Developments Ltd (752939) NHS Tayside (908896) Scottish Water (762198) SEPA (835401) SEStran Regional Transport Partnership (908118) sportscotland (905989) Springfield Properties (910130) Tactran Regional Transport Partnership (441235)
Provision of the development plan to which the issue relates:		
<p>This policy applies to all types of development and all scales of development within the TAYplan area. It sets out a series of issues for which attention should be given to ensure that we are facilitating the development of better quality places. These solutions will be determined by local circumstances and this is not a one size fits all approach.</p> <p>Policy 2D specifically relates to ensuring efficient resource consumption in terms of waste management solutions and high resource efficiency.</p>		
Planning Authority's summary of the representation(s):		
Summary of Representations Seeking a change <u>POLICY 2D: EFFICIENT RESOURCE CONSUMPTION</u> Sustrans (346798) PLAN2015_486 support the policy, but seek explicit recognition of the significant impact that increasing the number of people travelling actively, or on public transport, would have on reducing emissions and improving air quality. Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_532 consider that the energy performance of buildings should be a matter for building standards rather than planning policy as consider it unnecessary to duplicate provisions made elsewhere and request that reference is only made to the aspirations and the other mechanisms of control. Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015_417, Emac Planning LLP for J G Lang & Son (846827) PLAN2015_440, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015_403, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015_492. Emac Planning LLP for R Watson & Son (846824) PLAN2015_463, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015_516 and Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015_481 support the policy, specifically the role of orientation, design and materials in ensuring efficient resource consumption. They consider that the energy		

performance of buildings should be a matter for building standards rather than planning policy as consider it unnecessary to duplicate provisions made elsewhere. They consider that the building design, materials and construction have the potential to offer a more effective approach to carbon reductions than through the use of low carbon generating technologies.

Summary of Representations Supporting as written

WHOLE POLICY

Scottish Water (762198) PLAN2015_267 supports the whole policy as the promotion of water efficiency is a key focus for Scottish Water.

SEPA (835401) PLAN2015_194 support the whole policy and considers that this provides a strong framework to Local Development Plans. The respondent furthermore welcomes that a Strategic Flood Risk Assessment (Doc91) was carried out and that this has informed the Proposed Plan spatial strategy.

Dundee Civic Trust (845127) PLAN2015_280 support the whole policy as it is considered essential for long term sustainability and attracting and retaining investment.

NHS Tayside (908896) PLAN2015_323 support the whole policy and notes the positive impact of designing places and spaces contributing to a healthier population.

SEStran Regional Transport Partnership (908118) PLAN2015_28 support the whole policy. The respondent notes that it would be good to see the role transport sustainability has played in defining development areas.

Tactran Regional Transport Partnership (441235) PLAN2015_359 support the whole policy which is consistent with and complements the Regional Transport Strategy (Doc94).

Friends of the Earth Tayside (845935) PLAN2015_419 support the whole policy, with specific emphasis on the reduction of carbon emissions and health.

Springfield Properties (910130) PLAN2015_341 support the whole policy, with specific recognition given to the concept of lifetime communities which is particularly welcomed.

Mr David Wardrop for Headon Developments Ltd (752939) PLAN2015_499 support the whole policy as this outcome, which is consistent with Scottish Planning Policy 2014 (Doc84), was a key driver in the masterplanning work for St Andrews West Strategic Development Area (007/Extract/1) to date with the Urban Initiatives authored masterplan commended by Architecture and Design Scotland.

sportscotland (905989) PLAN2015_6 supports the whole policy, encouraging the development of sports pitches and facilities.

sportscotland (905989) PLAN2015_7 support the lifetime communities diagram and explanatory text as shows the holistic system.

Modifications sought by those submitting representations:

POLICY 2D: EFFICIENT RESOURCE CONSUMPTION

Sustrans (346798) PLAN2015_486

- Propose a change to Policy 2. D. ii. to seek explicit recognition of the significant impact that increasing the number of people travelling actively, or on public transport, would have on reducing emissions and improving air quality.

Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_532

- Propose a change to Policy 2 D. ii. b. & c. Suggested Change: 'The energy performance of buildings should however be a matter for building standards rather than planning policy. We therefore consider it unnecessary to duplicate provisions made elsewhere and request that reference only is made to aspirations and the other mechanisms of control.'

Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015_417, Emac Planning LLP for J G Lang & Son (846827) PLAN2015_440, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015_403, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015_492, Emac Planning LLP for R Watson & Son (846824) PLAN2015_463, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015_516 and Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015_481

- Suggested Change: Insert 'encouraging' at the start of criterion (b) and insert at the end of criterion (b) a sentence confirming 'this is a matter which will be secured in practice through building regulations requirements. A flexible planning policy approach should be adopted in accordance with the principles of Fabric First + LZCT+ Allowable Solutions.'

Summary of responses (including reasons) by Planning Authority:

Authority's response to proposed modifications

Context:

Policy 2 Part D develops upon the Approved TAYplan SDP (2012) (Doc16) in Policy 2 Parts D and E. This section emphasises the importance of building in waste management solutions and energy efficiency in new developments. To fulfil the Zero Waste Scotland Plan (2010) (Doc117) new development will also need to design-in space and other appropriate measures to allow users/inhabitants to separate and store waste prior to collection. In addition, there is an emphasis on heat networks. Development should also be capable of accommodating/connecting to heat network technology.

POLICY 2D: EFFICIENT RESOURCE CONSUMPTION

Sustrans (346798) PLAN2015_486

TAYplan welcomes the support for this policy. TAYplan consider that recognition has been given to the positive impacts of active travel in reducing emissions and improving air quality, both in the explanatory text following Policy 2 (Doc80) and in Policy 7 (Doc80), Policy 8 (Doc80) and Policy 9 (Doc80).

Therefore TAYplan does not consider any change to be necessary.

Emac Planning LLP for Stewart Milne Homes North Scotland (347277) PLAN2015_532, Emac Planning LLP for Linlathen Estates (Tayside) Ltd & James Keiller Estates Ltd (846825) PLAN2015_417, Emac Planning LLP for J G Lang & Son (846827) PLAN2015_440, Emac Planning LLP for Landvest PCC Ltd (910292) PLAN2015_403, Emac Planning LLP for F M & G Batchelor (846821) PLAN2015_492, Emac Planning LLP for R Watson & Son (846824) PLAN2015_463, Emac Planning LLP for Delson Contracts Ltd (846826) PLAN2015_516 and Emac Planning LLP for Scotia Homes Ltd (910294) PLAN2015_481

TAYplan welcomes the support for this policy.

In respect of the change being sought, the Proposed Plan has a strong emphasis on helping achieve relevant targets in the Climate Change Act (2009) (Doc26). This is required within the Planning etc. (Scotland) Act (2006) (Doc74). TAYplan consider that the energy performance of buildings is important to help achieve the stated outcomes.

The policy is flexible to at least align with building control regulations. Paragraph 154 of Scottish Planning Policy (2014) (Doc84) specifically states that 'The planning system should support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving:

- 30% of overall energy demand from renewable sources by 2020;
- 11% of heat demand from renewable sources by 2020; and
- the equivalent of 100% of electricity demand from renewable sources by 2020.'

This statement reinforces the flexibility required in this policy, particularly given the 20 year lifespan of the Strategic Development Plan.

The Strategic Development Plan must consider these standards as they are legitimate and important components of any development to reduce resource demand and switch to low/zero carbon energy sources. Failure to consider this element of place quality would represent a major deficit in any policy framework, particularly one which aims to support the delivery of targets to reduce carbon emissions in the Climate Change (Scotland) Act 2009 (Doc26) through a variety of measures.

TAYplan considers that the policy is consistent with national standards in considering the current economic climate. The changes being sought by the respondents to this policy would run contrary to Planning Authorities being required/ encouraged by the Scottish Government to assist in meeting Climate Change targets.

Therefore TAYplan does not consider any change to be necessary.

Authority's response to supporting representations

Scottish Water (762198) PLAN2015_267, SEPA (835401) PLAN2015_194, Dundee Civic Trust (845127) PLAN2015_280, NHS Tayside (908896) PLAN2015_323, SEStran Regional Transport Partnership (908118) PLAN2015_28, Tactran Regional Transport Partnership (441235) PLAN2015_359, Friends of the Earth Tayside (845935) PLAN2015_419, Springfield Properties (910130) PLAN2015_341, Mr David Wardrop for Headon Developments Ltd (752939) PLAN2015_499, sportscotland (905989) PLAN2015_6 and sportscotland (905989) PLAN2015_7

TAYplan welcome the support the Policy 2.

CONCLUSIONS

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.

TAYplan is satisfied that many of these issues are dealt with appropriately by the Policy as currently written or by supporting elements of Policies 3, 4, 8 and 10.

Quality of place is central to the Proposed Plan vision. To change this Policy could have fundamental implications for delivering the Scottish Government's objective of improving the quality of our places. More specifically, to change any part of Policy 2D could mean that the targets set out in the Climate Change (Scotland) Act 2009 (Doc26) are no longer fully considered and consequently the energy targets set out in Scottish Planning Policy might not be achieved.

Reporter's conclusions:

DPEA use only

Reporter's recommendations:

DPEA use only