

<b>Issue (ref and heading):</b>	008: Policy 2: Shaping Better Quality Places – Whole Policy And Other	
<b>Development plan reference:</b>	Policy 2 Page 14	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<b>Seeking a change</b> Colliers International for The Gleneagles Hotel (909368) D Barrie (907989) Friends of the Earth Tayside (845935) Miss Linda Harcus (910169) Mr Andrew Collins (909358) Mr Andrew Dundas (821782) Ms McEwen (832812) RSPB Scotland (910180) Scottish Natural Heritage (869435) Sustrans (346798)	<b>Supporting as written</b> 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)	
<b>Provision of the development plan to which the issue relates:</b>		
<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>		
<b>Planning Authority's summary of the representation(s):</b>		
<b>Summary of Representations Seeking a change</b> <b>WHOLE POLICY</b> <b>Colliers International for The Gleneagles Hotel (909368) PLAN2015_501</b> consider that the addition of two further criteria could provide greater strength and guidance/direction for development proposals coming forward. <b>Friends of the Earth Tayside (845935) PLAN2015_420</b> consider that statements in explanatory text accompanying policy should be enhanced by providing figures, trends and projections. <b>A) Design and Masterplanning</b> <b>Mr Andrew Dundas (821782) PLAN2015_185</b> suggests an alteration to building design standards as the respondent considers that the Planning system 'perpetuates conformity in building designs.' The respondent considers that we need to include colour in building as is considered to happen elsewhere in the UK and across Europe and North America. <b>Scottish Natural Heritage (869435) PLAN2015_187</b> consider that masterplans should reflect the key requirements of development frameworks, not the other way around. The respondent considers that the suggested alternative wording would reinforce the importance of a plan-led system. <b>Miss Linda Harcus (910169) PLAN2015_328</b> considers Scotland to lack good design to create style. The respondent considers the V&A to be good but considers the need for this across all buildings. The respondent considers that if we build attractive quality buildings and efficient smarter infrastructure in the countryside, the TAYplan area will flourish. The respondent considers Dundee to have a unique vantage point to become a great city.		

## **B) Transport**

**Mr Andrew Collins (909358) PLAN2015\_247** considers that Policy 2 should explicitly endorse the important concept of filtered permeability, developing references to interconnected spaces already made in the policy. The respondent also considers that there is some confusion about the intent of Designing Streets which can be interpreted as encouraging integrated road networks instead of integrated path networks.

### **POLICY 2A: PLACE LED**

**D Barrie (907989) PLAN2015\_15** considers Dundee Waterfront to obstruct views of the Tay.

### **POLICY 2B: ACTIVE AND HEALTHY BY DESIGN**

**Sustrans (346798) PLAN2015\_487** supports the policy, but suggests that it should be extended to include all active travel.

### **POLICY 2C: RESILIENT AND FUTURE READY**

**Ms McEwen (832812) PLAN2015\_2** considers that policy statement 2C should include the requirement for new building design in flood plain/flood risk areas and all hard ground surfaces to be made from permeable materials.

**RSPB Scotland (910180) PLAN2015\_346** supports the policy. However, the respondent considers that the insertion of an additional sub-section of Policy 2C related to opportunities for managed re-alignment and intertidal exchange.

## **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, was a key driver in the masterplanning work for St Andrews West and Science Park Strategic Development Area (008/Extract/3) to date with the Urban Initiatives authored masterplan commended by Architecture and Design Scotland.

### **POLICY 2B: ACTIVE AND HEALTHY BY DESIGN**

**sportscotland (905989) PLAN2015\_6** supports the whole policy, encouraging the development of sports pitches and facilities.

### **LIFETIME COMMUNITIES**

**sportscotland (905989) PLAN2015\_7** support the lifetime communities diagram and explanatory text as shows the holistic system.

### **Modifications sought by those submitting representations:**

#### **WHOLE POLICY**

##### **Colliers International for The Gleneagles Hotel (909368) PLAN2015\_501**

- Propose the addition of two further criteria could provide greater strength and guidance/direction for development proposals coming forward: 'Realistic - this is to ensure development proposals can be realised on the ground and are achievable in the context and timescales provided for (where appropriate). Adaptable - this to ensure places and spaces have the ability to grow and respond to changing needs, markets and users requirements.'

##### **Friends of the Earth Tayside (845935) PLAN2015\_420**

- Propose that the general statements should be strengthened to give a greater sense of urgency given the increasing levels of obesity and related diseases linked to inactivity, the increased incidence even now of serious flooding incidents, and the urgent need to improve resource efficiency and reduce carbon emissions.
- Also propose that some figures should be included to support this, illustrating the trends and projections.

#### **A) Design and Masterplanning**

##### **Mr Andrew Dundas (821782) PLAN2015\_185**

- Suggests alteration to building design standards.

##### **Scottish Natural Heritage (869435) PLAN2015\_187**

- Propose change: 'To deliver better quality development and places which respond to climate change, Local Development Plans, design frameworks masterplans/briefs and development proposals should be:' to 'To deliver better quality development and places which respond to climate change, Local Development Plans, design frameworks and design briefs should be prepared in advance of masterplans and development proposals. Plans and proposals should be:'

##### **Miss Linda Harcus (910169) PLAN2015\_328**

- Implied change sought to have a better design in all buildings.

#### **B) Transport**

##### **Mr Andrew Collins (909358) PLAN2015\_247**

- Propose that Policy 2 should explicitly endorse the important concept of "filtered permeability". There are references to interconnected spaces but it is not made clear that these this should only refer to sustainable transport: "B iv c. support land use and transport integration by transport assessments/appraisals and travel plans where appropriate, including necessary on and off-site infrastructure." It should be made clear that the transport integration should NOT include any vehicular traffic other than public transport.
- Propose that the word "existing" should be deleted from the following clause:

"Integrate Networks. Making it easy, safe and desirable to walk and cycle within and between neighbourhoods utilising existing green networks (e.g. green space and water networks) and enhance these areas to deliver a better quality of place and life."

- Propose that Policy 2 should also make it clear that dead end roads (with turning spaces and filtered permeability) are to be encouraged within new housing developments.

**POLICY 2A: PLACE LED**

**D Barrie (907989) PLAN2015\_15**

- No specific change specified.

**POLICY 2B: ACTIVE AND HEALTHY BY DESIGN**

**Sustrans (346798) PLAN2015\_487**

- Propose a change to Policy 2. B. iv. b. to extend this provision to include all active travel.

**POLICY 2C: RESILIENT AND FUTURE READY**

**Ms McEwen (832812) PLAN2015\_2**

- Propose that policy statement 2C should include the requirement for new building design in flood plain/flood risk areas and all hard ground surfaces to be made from permeable materials.

**RSPB Scotland (910180) PLAN2015\_346**

- Propose change to Policy 2C to insert between iii and iv "opportunities for managed re-alignment and intertidal exchange" will be explored.

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

**Authority's response to proposed modifications**

**WHOLE POLICY**

**Colliers International for The Gleneagles Hotel (909368) PLAN2015\_501**

TAYplan does not consider it necessary to add the suggested additional criteria. Both suggested criteria are covered elsewhere within this policy and within Policy 1 Location Priorities (Doc80) and Policy 3 Investment (Doc80). TAYplan consider that Policy 2A focuses on realistic criteria through which distinctive places can be delivered on the ground. TAYplan do not consider that further detail should be included at this scale but instead specific components related to delivery on the ground would be considered through the Local Development Plan (Doc5). TAYplan also consider that Policy 2B, C and D promotes adaptable places providing a framework for places to mature and develop to changing circumstances. Therefore TAYplan does not consider any change to be necessary.

**Friends of the Earth Tayside (845935) PLAN2015\_420**

TAYplan consider there to be a sufficient level of detail provided in the Proposed Plan on health and climate change resilience. The Strategic Development Plan should be a concise document with any additional information in background documents. Additional figures backing up statements in the Proposed Plan are available in the Monitoring Statement (2014) pages 12-14 and pages 56-57 (Doc101) and Topic Paper 3: Assets, Resources and Infrastructure pages 24-30 (Doc105). Therefore TAYplan does not consider any change to be necessary.

**A) Design and Masterplanning**

**Mr Andrew Dundas (821782) PLAN2015\_185**

TAYplan is satisfied that Policy 2 provides a framework for good quality design and places across the TAYplan area. Changes to building design standards would occur nationally through the Scottish Government. The Scottish Government's guidance on Creating Places (2013) (Doc29) is central to TAYplan's Policy 2 on Shaping Better

Quality Places to ensure a level of consistency in good design across Scotland. Policy 2 is consistent with Scottish Planning Policy (Doc84). Therefore TAYplan does not consider any change to be necessary.

**Scottish Natural Heritage (869435) PLAN2015\_187**

TAYplan is satisfied that the wording in Policy 2 provides Local Development Plans with the required direction and is consistent with Scottish Planning Policy (2014) (Doc84). Scottish Planning Policy (page 17) (Doc84) sets out the scale at which Masterplans fit into the planning system. It is not considered that this needs to be repeated within the Strategic Development Plan. Therefore TAYplan does not consider any change to be necessary.

**Miss Linda Harcus (910169) PLAN2015\_328**

TAYplan welcome the support for this policy. In respect of the implied change sought to have better design in all buildings, TAYplan does not consider that this policy contradicts other policies in the Plan. Each policy should be read together. The principles in Policy 2 are integral to the delivery of all policies in the Plan and accords with Scottish Planning Policy (2014) (Doc84). Therefore TAYplan does not consider any change to be necessary.

**B) Transport**

**Mr Andrew Collins (909358) PLAN2015\_247**

TAYplan considers that sufficient consideration of interconnected spaces has been provided at the strategic scale. TAYplan's strategy does not promote that there will be no use of the private car, instead it promotes greater choice and opportunities to use public transport and ensuring this is integrated within the makeup of a place. Further detailed consideration of the concept of filtered permeability would be considered through Local Development Plans and Masterplans for individual development proposals. **SEStran Regional Transport Partnership (908118) PLAN2015\_28** and **Tactran Regional Transport Partnership (441235) PLAN2015\_359** both support the whole policy and consider it to be consistent with and complement the Regional Transport Strategies (Doc94).

TAYplan do not consider it necessary for the word 'existing' to be removed from the clause on page 16. The place led approach highlighted through this diagram focuses on existing green networks. Policy 8 (Doc80) provides further detail on TAYplan's approach to new green networks and the strategy for this.

TAYplan do not consider that specific detail as to the types of roads used in housing estates is necessary at a strategic scale. This is an issue which would be dealt with through any relevant masterplanning in referring to the guidance set out in Designing Streets (2010) (Doc30). Therefore TAYplan does not consider any change to be necessary.

**POLICY 2A: PLACE LED**

**D Barrie (907989) PLAN2015\_15**

The Dundee Waterfront Strategic Development Area is part of a wider Masterplan (008/Extract/1) which has considered, among other things, views from all directions along the Waterfront and from the city centre. TAYplan considers the proposals to enhance the River Tay as a regional asset and setting. Dundee Waterfront is within TAYplan's green network strategy and design, open space and views in/ out of the Tay are essential to the work that has been undertaken in developing this. Therefore TAYplan does not consider any change to be necessary.

**POLICY 2B: ACTIVE AND HEALTHY BY DESIGN**

**Sustrans (346798) PLAN2015\_487**

TAYplan welcome the support for this policy. TAYplan consider that subsection 2B of this policy provides scope for all activity travel in referring to 'related facilities' in

policy part iv) a). Therefore TAYplan does not consider any change to be necessary.

### **POLICY 2C: RESILIENT AND FUTURE READY**

#### **Ms McEwen (832812) PLAN2015\_2**

TAYplan consider that Policy 2C states a presumption against development in areas vulnerable to flood risk. However, in situations where building does take place in areas of flood risk, the policy highlights that adaptability and resilience will be critical in ensuring that design and longevity is considered.

TAYplan does not consider there to be a need for a specific reference to permeable materials as this is covered in the Building Regulations Technical Handbook – Domestic (page 152) (Doc20) and Non Domestic (pages 430 point 3c) (Doc21). TAYplan do not consider there to be a need for this to be repeated.

It is also noted that both Scottish Environment Protection Agency and Scottish Water support the whole policy recognising that the Proposed Plan provides a strong framework to Local Development Plans, welcoming the Strategic Flood Risk Assessment carried out by TAYplan and supporting water efficiency as a key focus of the policy. Therefore TAYplan does not consider any change to be necessary.

#### **RSPB Scotland (910180) PLAN2015\_346**

TAYplan welcome the support for this policy. TAYplan do not consider the suggested additional text to be required in the Strategic Development Plan. It is considered that Policy 2C provides sufficient guidance to Local Development Plans and further detail around managed re-alignment and intertidal exchange would be considered through the Local Development Plan. 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. A number of the points raised relate to detailed wording which TAYplan consider to be covered in Scottish Planning Policy (Doc84)/ Creating Places (Doc29) guidance and that there is no need to repeat this at the strategic scale. TAYplan also note the significant support for this policy from Government/ Key Agencies including Scottish Water, Scottish Environment Protection Agency, NHS Tayside, SEStran Regional Transport Partnership, Tactran Regional Transport Partnership, and Sportscotland.

<b>Reporter's conclusions:</b>
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<b>Reporter's recommendations:</b>
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