

Issue (ref and heading):	009: Policy 3: A First Choice For Investment – Whole Policy	
Development plan reference:	Policy 3 Parts A, B, C, D and E and Map 3 - Pages 20 to 23	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
Seeking a change Colliers International for The Gleneagles Hotel (909368) Comrie Development Trust (910287) Friends of the Earth Tayside (845935) Mr Thomas Wallace (910151) RSPB Scotland (910180) Scott Hobbs Planning for Scottish Enterprise (909506) Scottish Government (910172) Scottish Property Federation (444087) sportscotland (905989)		Springfield Properties (910130) Studio LK Ltd for JWK Properties (910156) Supporting as written Colliers International for Scottish Enterprise (835481) Dundee Civic Trust (845127) NHS Tayside (908896) Scottish Water (762198) sportscotland (905989) Tactran Regional Transport Partnership (441235)
Provision of the development plan to which the issue relates:		
<p>Policy 3 Parts A, B and C is a continuation of the same approach set out in approved TAYplan (2012) (Doc16) and the previous Policy 3 (Employment Land). The approach is to ensure that Local Development Plans provide and safeguard a supply of employment land capable of being brought forward which meets the diverse and varying needs of a range of different potential business users. It also recognises the importance of the visitor economy.</p> <p>The approach set out in Proposed TAYplan (2015) (Doc80) Policy 3 Parts D and E is the same as approved TAYplan (2012) (Doc16) Policy 4 parts A and B. The wording has changed slightly but the emphasis has not. There are no new Strategic Development Areas and none have been deleted.</p>		
Planning Authority's summary of the representation(s):		
<p>Summary of Representations Seeking a change</p> <p><u>ECONOMIC GROWTH</u></p> <p>Colliers International for The Gleneagles Hotel (909368) PLAN2015_504 consider that, for completeness, reference should be made within the policy supporting text to the National Tourism Development Framework(Doc62), as the Framework highlights the importance of the tourism industry to Scotland's economy would be welcomed.</p> <p>Comrie Development Trust (910287) PLAN2015_396 consider that tourism and events uses should be added to the footnote defining land for employment uses.</p> <p>Mr Thomas Wallace (910151) PLAN2015_316 consider it unclear what is meant by sustainable economic growth. It is highlighted that oil and gas are not sustainable in the long term, but that the plan seems to give equal emphasis and priority to these industries. This is against the broader concern of the document about the impacts of Climate Change.</p> <p>Springfield Properties (910130) PLAN2015_342 consider that opportunities for land for the development of investment areas should be specifically identified within the principle settlements within the hierarchy. The respondent considers that the importance of design frameworks within the areas should be emphasised with the onus being on the Council to work with landowners / developers in control of the land to set up the frameworks to make the process smoother.</p>		

Studio LK Ltd for JWK Properties (910156) PLAN2015_320 do not consider Policy 3C to be specific enough in terms of its guidance to Local Development Plans, given the importance of tourism to the regional economy. The respondent also wishes for JWK Properties planning consent, 10/01899/AMM, for a 300 bed, 5 star hotel on an approximate 9.5 ha site at Burnfoot, Kinfauns, Perth and Kinross to be included as a Strategic Development Area.

Scottish Property Federation (444087) PLAN2015_510 support the quality of life basis for the plan and how this can support growth. The respondent suggests that 'key challenge for the region' is to build on its existing strengths, and develop as a destination to attract tourism; to retain graduates; and to seize the opportunities for energy based services arising from the maritime renewables and leisure sectors.

NATIONAL MARINE PLAN AND ENERGY

Scottish Government (910172) PLAN2015_329 recommends that the Strategic Development Plan refers to the National Marine Plan as being a relevant part of the general planning and/or decision making framework. The respondent considers that if this is not considered possible or appropriate in view of the current text structure then the respondent considers that this should be referred to specifically in the policies or supporting text.

Friends of the Earth Tayside (845935) PLAN2015_421 considers that there should be an indication provided that North Sea oil and gas exploration and production is a declining industry and that there is a need to transition more rapidly towards renewable energy development in line with Scotland's targets for reducing carbon emissions and phasing out the use of fossil fuels. The respondent considers this to be a real opportunity for Scotland and the TAYplan region.

EMPLOYMENT LAND SUPPLY

Scott Hobbs Planning for Scottish Enterprise (909506) PLAN2015_349 considers that opportunities should be maximised for investment in TAYplan's economic sites and the respondent wishes TAYplan to give consideration to whether the Proposed Plan optimises the potential for the flexible economic use of land within employment sites. The respondent requests that consideration is given to minor amendments to Policy 3 where it explicitly refers to the 3 particular Use Classes of 4, 5 and 6 to allow delivery of other forms of appropriate economic development in those circumstances where alternative uses would demonstrably provide employment opportunities / densities equal to or greater than the specifically allocated use and which would be consistent with the economic environment being created.

DESIGN FRAMEWORKS

RSPB Scotland (910180) PLAN2015_353 The respondent considers that a policy that supports developers in contributing towards offsite environmental improvements would help Councils fulfil their biodiversity duties.

sportscotland (905989) PLAN2015_9 consider that for some uses, such as sports centres and schools, a town centre location may not always be the most appropriate location - due for example to proximity to the relevant users, or site size (e.g. if pitches are involved).

This issue has also been raised by the respondent in relation to Schedule 022 Policy 5: Town Centres First.

Summary of Representations Supporting as written

Dundee Civic Trust (845127) PLAN2015_281 and **Scottish Water (762198) PLAN2015_268** support the policy.

NHS Tayside (908896) PLAN2015_324 support the policy, particularly the emphasis on economic growth.

Tactran (441235) PLAN2015_361 support Policy 3 which is consistent with and complements the Regional Transport Strategy.

sportscotland (905989) PLAN2015_8 support the specific reference to the role of sport in the year-round economy, and the requirement placed on Local Development Plans to facilitate related development.

Colliers International for Scottish Enterprise (835481) PLAN2015_369 support the policy, specifically the approach to ensuring that the most appropriate areas for strategic development, which underpins the growth of the region and the requirement for Local Development Plans to include Design Frameworks for Strategic Development Areas.

Modifications sought by those submitting representations:

ECONOMIC GROWTH

Colliers International for The Gleneagles Hotel c/o Colliers International (909368) PLAN2015_504

- Propose change to reference within policy 3 supporting text reference to the National Tourism Development Framework for Scotland (2013) (Doc62) for completeness, as the Framework highlights the importance of the tourism industry to Scotland's economy; this is particularly the case within the Perthshire and wider TAYplan area.
- The intention to create a policy framework which "seeks to assist in growing the year-round economy includes the role of the tourism, sporting and recreation sectors" as advocated in the Topic Paper is strongly supported and as such we would urge the SDP Authority to ensure this intention is reflected in emerging policy.
- In specific relation to tourism/leisure, it is noted that "An important factor in achieving our growth ambitions is in continuing TAYplan's existing tourism assets into more rounded, added value experiences that today's visitors want." This is strongly supported and we would welcome the introduction of this wording (or similar) into proposed Policy 3.

Comrie Development Trust (910287) PLAN2015_396

- Propose adding tourism and events uses to the footnote defining land for employment uses.

Mr Thomas Wallace (910151) PLAN2015_316

- Implied change around making it clear what 'sustainable economic growth' actually is. Does it mean growth which is environmentally sustainable and therefore can be continued indefinitely into the future? The danger is that the phrase will simply be interpreted to mean ongoing economic growth, irrespective of its potential damage to the environment and its long-term viability.
- No other specific change identified.

Springfield Properties (910130) PLAN2015_342

- Propose that opportunities for land for the development of these investment areas to be specifically identified within the principle settlements within the hierarchy. The importance of design frameworks within the areas should be emphasised with the onus being on the Council to work with landowners / developers in control of the land to set up the frameworks to make the process smoother.

Studio LK Ltd for JWK Properties (910156) PLAN2015_320

- Policy 3C is not specific enough in terms of its guidance to Local Development Plans, given the importance of tourism to the regional economy. JWK Properties' planning consent, 10/01899/AMM, for a 300 bed, 5 star hotel on an approximate 9.5 ha site at Burnfoot, Kinfauns, Perth and Kinross should be included as a Strategic Development Area in the table on page 20.

Scottish Property Federation (444087) PLAN2015_510

- No specific change identified.

NATIONAL MARINE PLAN AND ENERGY

Scottish Government (910172) PLAN2015_329

- It is recommended that the Strategic Development Plan refers to the National Marine Plan (Doc59) as being a relevant part of the general planning and/or decision making framework. If this is not considered possible or appropriate in view of current text structure then it should be referred to specifically in the policies or their supporting text above. This could be done in any / all of the following policies: Policy 3: First choice for investment (Doc80), Policy 7: Energy, waste and resources (Doc80), Policy 10: Connecting people (Doc80).

Friends of the Earth Tayside (845935) PLAN2015_421

- Propose that reference to Dundee and Montrose ports being "increasingly attractive for oil, gas and wider offshore energy business" should be amended to indicate that North Sea oil and gas exploration and production is a declining industry and that there is a need to transition more rapidly towards renewable energy development in line with Scotland's targets for reducing carbon emissions and phasing out the use of fossil fuels.

EMPLOYMENT LAND SUPPLY

Scott Hobbs Planning for Scottish Enterprise (909506) PLAN2015_349

- Propose that the following change is made (changes shown in **bold**): Local Development Plans should:
 1. identify and safeguard at least 5 years supply of employment land* to support the growth of the economy and a diverse range of industrial requirements;....

Footnotes

*Land for employment includes Classes 4 (business), 5 (General Industrial) and 6 (storage and distribution) from the Use Classes (Scotland) Order (1997) (Doc109) **and which may allow, in certain circumstances, other uses which generate employment densities equal to or greater than those specified above.** The location of some of these is considered as part of the town centres first approach in Policy 5.

DESIGN FRAMEWORKS

RSPB Scotland (910180) PLAN2015_353

- Propose adding Policy 3F 'encourage developers to contribute towards offsite environmental improvements.'

sportscotland (905989) PLAN2015_9

- The second last paragraph on page 23 states...."Land uses that generate a significant footfall will also be subject to the town centres first approach in Policy 5." Propose that some form of caveat is provided in this comment, along the lines of "While SPP (Doc84) outlines a town centre first approach, it is recognised that community and educational facilities should be easily accessible to the communities they serve. Local Development Plans should allow a degree of flexibility to allow the most appropriate siting."

Summary of responses (including reasons) by Planning Authority:

Authority's response to proposed modifications

ECONOMIC GROWTH

Colliers International for The Gleneagles Hotel c/o Colliers International (909368) PLAN2015_504

TAYplan is satisfied with the text in the policy and supporting text, as it stands. Work has been undertaken reviewing all background documents, including the National Tourism Development Framework. This has been detailed in Topic Paper 4: Place Shaping (2015) (Doc106). TAYplan do not consider it necessary to single out this document and refer to it in the policy or supporting text of Policy 3. Topic Paper 4: Place Shaping (2015) (pages 5-9) (Doc106) highlights the range of background documents that have been considered in developing the Proposed Plan. Therefore TAYplan does not consider any change to be necessary.

Comrie Development Trust (910287) PLAN2015_396

TAYplan is satisfied with the text in the policy and supporting text, as it stands, and do not consider the addition of these words to add to the clarity of the policy and/ or direction to Local Development Plans. Tourism is already a key component of Policy 3. Tourism is not specifically considered under land for employment uses in the Use Classes (Scotland) Order 1997 (Doc109). Therefore TAYplan does not consider any change to be necessary.

Mr Thomas Wallace (910151) PLAN2015_316

The primary objective of the Scottish Government is to foster sustainable economic growth. This is highlighted in the foreword to the National Planning Framework 3 (NPF3) (2014) on page 1 (paragraph 1.1) (Doc60): 'The Scottish Government's central purpose is to create a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.' The Scottish Government explain sustainable economic growth as sharing 'the benefits of growth by encouraging economic activity and investment across all of Scotland's communities, whilst protecting our natural and cultural assets' NPF3 page 1 (paragraph 1.1) (Doc60). TAYplan's vision and objectives illustrates that the Plan has many focuses, primarily delivering sustainable economic growth through delivering better quality places and responding to the Climate Change (Scotland) Act 2009 (Doc26).

TAYplan considers that recognition has been given to the range of industries that create the vibrancy of the region. Within the supporting text for Policy 3 (Doc80) on page 22 TAYplan notes the importance of supporting and growing 'finance, renewables, energy, food and drink, life sciences, cultural industries and the visitor economy'. Topic Paper 2: Growth Strategy (pages 59-62) (Doc104) reinforces this approach, providing further detail on the wide range of important industries in the TAYplan region and how these are being marketed and developed. Therefore TAYplan does not consider any change to be necessary.

Springfield Properties (910130) PLAN2015_342

TAYplan consider that the level of detail included within this policy is sufficient at the strategic level. Employment sites of a strategic significance are identified/ allocated. This provides sufficient direction and scope for this to be developed further for specific settlements and sites through the Local Development Plan. Policy 2 (Doc104) of the Proposed Plan provides further detail on Masterplans and Design Frameworks. These should be developed in communication with relevant parties. Scottish Planning Policy also provides guidance on strategic design frameworks and masterplans and how these should be formulated. Therefore TAYplan does not consider any change to be necessary.

Studio LK Ltd for JWK Properties (910156) PLAN2015_320

TAYplan consider that Policy 3C provides sufficient direction for Local Development Plans to apply to specific development proposals and local policies. It is not necessary or relevant for further detail to be included, at a strategic scale, on the role of tourism. This will be dealt with on a settlement/ site basis through Local Development Plans and planning applications.

The response to this comment has been covered in Issues 010: Policy 3D and Map 3: A First Choice for Investment – Strategic Development Areas.

Scottish Property Federation (444087) PLAN2015_510

TAYplan supports building on the region's existing strengths, and developing as a destination to attract tourism; to retain graduates; and to seize the opportunities for energy based services arising from the maritime renewables and leisure sectors. Topic Paper 2: Growth Strategy (2015) (Doc104) outlines, in more detail, the work TAYplan has carried out into looking tourism/ leisure (page 61) and the importance of the Universities and retaining graduates. Similarly, Topic Paper 3: Assets, Resources and Infrastructure (2015) (Doc105) explains TAYplan's approach to the innovative use of energy and energy based services (pages 8 – 18). Therefore TAYplan does not consider any change to be necessary.

NATIONAL MARINE PLAN AND ENERGY

Scottish Government (910172) PLAN2015_329

Whilst the suggested change proposed by the respondent may provide some clarity with regard to the National Marine Plan, TAYplan do not consider this reference to be necessary.

Friends of the Earth Tayside (845935) PLAN2015_421

TAYplan do not consider there to be a requirement for further explanation into North sea oil and gas exploration as this is predominately out with the TAYplan area. The supporting text of Policy 3 states that 'Dundee and Montrose Ports will play a major role in Britain's east coast energy cluster as envisaged by National Planning Framework 3 and the National Renewables Infrastructure Plan (2011). They are increasingly attractive for oil, gas and wider offshore energy businesses.' Topic Paper 3: Assets, Resources and Infrastructure (pages 8-18) (Doc105) also provides a detailed review of TAYplan's work and emphasis on renewable energy sources, noting the opportunity of these to the TAYplan area. Therefore TAYplan does not consider any change to be necessary.

EMPLOYMENT LAND SUPPLY

Scott Hobbs Planning for Scottish Enterprise (909506) PLAN2015_349

TAYplan consider that the Plan provides a wide context for flexibility within employment sites promoting the value and role of TAYplan as a place and bringing important social and economic opportunities. TAYplan consider that the Use Classes mentioned in the footnote are the most relevant and appropriate and there is a degree of flexibility within these. These do not and will not prevent growth of other businesses. Therefore TAYplan does not consider any change to be necessary.

DESIGN FRAMEWORKS

RSPB Scotland (910180) PLAN2015_353

TAYplan does not consider an additional sub-section to this policy to be necessary. Policy 2 (Doc104) provides further detail on place shaping and masterplanning requirements making it clear that environmental considerations are integral. Therefore TAYplan does not consider any change to be necessary.

sportscotland (905989) PLAN2015_9

TAYplan are satisfied with the text in the policy as written and consider that the provision of e.g. sports centres and schools would be considered on a case by case

basis by local authorities and be located in areas where they are most required. Therefore TAYplan does not consider any change to be necessary.

Authority's response to supporting representations

Dundee Civic Trust (845127) PLAN2015_281, Scottish Water (762198) PLAN2015_268, NHS Tayside (908896) PLAN2015_324, Tactran (441235) PLAN2015_361, sportscotland (905989) PLAN2015_8 and Colliers International for Scottish Enterprise (835481) PLAN2015_369

TAYplan welcomes support for Policy 3.

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 1, 2, 4 and 5. It is also noted that Government/ Key Agencies have specifically supported the policy, including NHS Tayside, Tactran and Sportscotland. They have specifically supported the emphasis on economic growth and that the policy complements other national/ regional/ local strategies.

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