

<b>Issue:</b>	022: Town Centres First	
<b>Development plan reference:</b>	Policy 5 Town Centres First and Map 5 Network of Centres, Pages 30-34	<b>Reporter:</b> [DPEA Use only]
<b>Body or person(s) submitting a representation raising the issue representation reference:</b>		
<b>Seeking a change</b> Andrew Dundas (821782) Claudine Scott (907629) Comrie Development Trust (910287) Friends of the Earth Tayside (845935) Jennifer Hughes (844415) Montagu Evans LLP for Land Investment Management (343111) Professor George Evans (846525) Scott Hobbs Planning for Scottish Enterprise (909506)		Scottish Property Federation (444087) SportsScotland (905989) St Andrews Preservation Trust (910253) Sustrans (346798)  <b>Supporting as written</b> Dundee Civic Trust (845127) Scottish Environment Protection Agency (835401) Scottish Water (762198) Tactran Regional Transport Partnership (441235)
<b>Provision of the development plan to which the issue relates:</b>		
This Policy defines a network of centres, land uses that generate significant footfall as well as other land uses and activities. It also explains how the sequential approach will operate within the context of the defined network of centres, their roles and their functions to implement the town centres first approach.		
<b>Planning Authority's summary of the representation(s):</b>		
<h2>Summary of Representations Seeking a change</h2> <h3><u>LOCATIONS OUTWITH CITY/TOWN CENTRES</u></h3> <p><b>Montagu Evans LLP for Wallace Land Investment Management (343111)</b>  <b>PLAN2015_250</b> supports the principle of Policy 5 (Doc80). However, they do not consider that a 'one policy fits all' approach is acceptable. They consider that TAYplan should acknowledge that the strategy should allow for retail and other floor space to be developed outwith the town centre. The respondent considers that smaller Town Centres such as Kinross should not necessarily be constrained, and that local considerations in a regional context should be key. The respondent is promoting a site outwith Kinross town centre.</p> <p>The respondent quotes Scottish Planning Policy (2010) paragraph 45 (Doc85) in support of their views. The respondent considers that a key focus of Scottish Planning Policy is town centres but that it also establishes the methods for identifying a network of centres within the development plan and for treating proposals for development outwith town centres. The respondent considers that not to do so, in line with Scottish Planning Policy, could potentially undermine and limit inward investment opportunities.</p> <p><b>Scott Hobbs Planning for Scottish Enterprise (909506) PLAN2015_350</b> supports the clear policies in Town Centres First but considers that the specific wording of Policy 5 (Doc80) should not have a detrimental effect on creating opportunities for Class 4 office development on land identified for and safeguarded as part of the 5 years supply of employment land, as referred to in the Proposed Plan Policy 3 (Doc80). The respondent requests that consideration is given to the specific wording of the policy to ensure that it will achieve the desired aim of town centre development without unnecessary constraint being presented to economic development opportunities on Policy 3 land (Doc80).</p> <p>Whilst the respondent appreciates the attempts to seek to redirect the intentions of investors towards town centres, the respondent requests TAYplan gives further consideration to the requirements of Policy 5 Town Centre First (Doc80) and in particular 5A (Doc80) and the identified Sequential Priority / functions of centres to ensure that TAYplan and all associated Local Development Plans do not result in a detrimental attitude towards investment especially as the respondent notes that it is intended to delete the previous policy to safeguard Class 4 (offices) land. The respondent supports the allocation of land under</p>		

Policy 3 (Doc80), and feels that as this is justified, then it should not be 'covertly withdrawn' by Policy 5 (Doc80). They consider that to do so may prevent delivery of employment land within the strategic priority areas.

### **TOWN CENTRES FIRST**

**sportscotland (905989) PLAN2015\_10** considers there to be a need to recognise that a town centre may not always be the most appropriate location for some high footfall land uses due, for example, to the proximity of relevant users, or because of the site size. They consider that if Local Development Plans have policies which impose a blanket sequential approach on all such development, then the likes of new primary schools could be directed to a town centre, in preference to a larger site on the settlement edge which would allow space for sports pitch(es). Another example they provide considers a sports facility that is proposed to support a thriving local Club. They consider that to continue the success/popularity, it may be important for the facility to remain in that local community as opposed to a town centre. The respondent appreciates that in this instance the development may not be classed as generating 'significant footfall' but provides these examples to demonstrate why they are cautious about potential unintended consequences of the town centre first approach - subject to the detailed wording of Policy.

**sportscotland (905989) PLAN2015\_11** considers that community, health care and education facilities are located best within the communities that they serve and that Policy 5A might have potential unintended consequences of the town centre approach for sport and educational facilities.

**Claudine Scott (907629) PLAN2015\_225** considers Cupar's town centre to be 'deteriorating in terms of vacant shops and reduced footfall'. She asks how the centre will be improved in Cupar before the Policy 5 (Doc80) sequential approach moves to "Sequential Priority 2" to develop the surrounding area.

She asks what evidence TAYplan has regarding 'increased current footfall on Cupar high street' and if this been a reason for development outwith the centre. She considers that the town's footfall has 'significantly decreased' and the building of a proposed retail park on the perimeter, will 'kill the high street and Cupar's centre will reflect that of Kirkcaldy/Leven who's high streets have suffered as a result of a retail outlet being built on their outskirts'.

The first paragraph of Policy 5 (Doc80) advises that the development, if it goes ahead, will "protect and enhance the vitality, viability and vibrancy of city/town centres" - the respondent would like to be provided with evidence of previous towns/developments where TAYplan have been successful in doing this and what will be done in Cupar to support this?

The respondent considers that retail development outwith the town centre would seriously affect the current town centre footfall and that the proposed new road on the edge of Cupar will 'eliminate the need to travel through the centre of Cupar, thus resulting in a decrease footfall, which TAYplan are primarily trying to improve before a development is built on the outskirts of a town'.

The respondent would like TAYplan to clarify how the Network of Strategic Centres highlighting Cupar as a Larger Town Centre was measured. The respondent would like to know if this is relating to population/current shop frontage on the high street. The respondent also considers there is a need for new Health Centre and a new dentist in the town. This is also considered in the Schedule 4 Summary of Unresolved Issues for Issue 011: Cupar North.

**Jennifer Hughes (844415) PLAN2015\_315** considers the proposal to build 1,400 houses on 'good agricultural land' to the north of Cupar will 'do nothing to put the town centre first'. She considers that the proposals are 'developer-led and will mean years of heavy construction traffic in the town centre and the narrow streets in the north of Cupar'. She also considers that this will make the town centre 'even less of a pleasant place to walk and shop

than it is now'. She states that there is 'no work locally for 1,400 houses - worth of people, so they will all commute to Dundee and beyond, and therefore shop elsewhere'. She therefore considers TAYplan will 'turn Cupar's town centre into a derelict crumbling wasteland surrounded by ugly suburbs - just like Dunfermline is- within ten years'. This issue is also considered in the Schedule 4 Summary of Unresolved Issues for Issues 011: Cupar North.

**Professor George Evans (846525) PLAN2015\_447** considers that it would be beneficial to focus new housing closer to Cupar town centre where there are 'buildings that remain unoccupied'. He considers there is no reason for a relief road in Cupar because of the 'recent changes to the road network within the centre'. He considers it important for Cupar to maintain a vibrant core and the northern relief road and associated Cupar North development (with 'suburban sprawl housing') would 'detract from this objective'. He considers it will 'create additional traffic, noise and pollution and that tourism would suffer'. Furthermore, he considers that retail in the town of Cupar would 'suffer, as people would be diverted away from the town centre'. He considers that the idea that bulky goods retail would provide employment in the future is 'laughable', as retail is now 'computerised and automatised more and more, and that on-line retail in particular is growing rapidly'. This is also considered in the Schedule 4 Summary of Unresolved Issues for Issues 011: Cupar North.

**Comrie Development Trust (910287) PLAN2015\_395** considers that there can occasionally be cases where Policy 5's sequential approach would not be appropriate. For example, the respondents suggest that footfall generating development designed to attract visitors to historically important locations and/or where the heritage interest is at risk, such as Cultybraggan Camp in which the respondent has an interest. The respondent considers such development to play an important part in sustainable preservation and enhancement of such important assets. Furthermore, the respondent considers that this kind of enabling development can only be located at the historic sites and these, like Cultybraggan Camp, are often not located within a Town Centre.

**Scottish Property Federation (444087) PLAN2015\_510** considers that planning policies should promote the enhancement of leisure, hotel and restaurant offers in town centres. They consider that changes in consumer demand, particularly towards online retail and convenience shopping mean that traditional retail development has changed and poses many challenges for town centres.

**St Andrews Preservation Trust (910253) PLAN2015\_544** considers that there should be a more integrated approach across the whole TAYplan area to the balanced provision of schools, healthcare, care homes and other vital services, including the emergency services.

**Andrew Dundas (821782) PLAN2015\_182** considers that the strategy within the proposed plan is 'not commercially aware enough and lacking in forward thinking'. His concerns include the change in shopping patterns in recent years which he suggests involve 'certain types of commerce such as market trading dropping in usage and the rise of internet shopping'. As a result, he is concerned that city and town centres will be left with a 'blight' of 'scruffy and derelict buildings'. He advocates that the proposed plan should allow for 'change of use within centres for homes and short term lets'. This, he considers, will also allow 'iconic buildings' to be retained, encouraging 'new and alternative uses' to be accommodated.

### **SUSTAINABLE TRANSPORT**

**Friends of the Earth Tayside (845935) PLAN2015\_424** considers that the combination of Policies 2, 5 and 10 (Doc80) should help to reduce carbon emissions from transport. The respondent considers the need for an explicit statement about the environmental benefits of co-locating services and facilities in urban centres which are easily accessible on foot, by bike and by public transport.

**Sustrans (346798) PLAN2015\_488** supports the focus on town centres particularly in terms of encouraging pedestrians, cyclists and public transport. The respondent seeks an explicit recognition of development encouraging parking management in town centres. They cite a London Councils report as evidence of the importance to encourage walkable centres which can in turn promote greater spending (022/Extract/3).

## **Summary of Representations Supporting as written**

### **SUSTAINABLE TRANSPORT**

**Scottish Environment Protection Agency (835401) PLAN2015\_195** supports Policy 5 (Doc80) in terms of supporting the reduction of car usage and greenhouse gas emissions.

### **OVERALL POLICY**

**Scottish Water (762198) PLAN2015\_270** supports this policy.

**Dundee Civic Trust (845127) PLAN2015\_283** welcomes the focus on existing centres for the reasons set out in the plan and in particular the importance of creating life and vitality in existing town and city centres. They note that this policy has been ignored by one of TAYplan's constituent Councils in some of their recent planning approvals.

**Tactran (441235) PLAN2015\_362** supports Policy 5 (Doc80) which is consistent with and complements the Regional Transport Strategy (Doc94).

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

#### **LOCATIONS OUTWITH CITY/TOWN CENTRES**

**Montagu Evans LLP for Wallace Land Investment Management (343111)**

**PLAN2015\_250** propose the following changes to Policy 5:

- "TAYplan should acknowledge the strategy should allow for retail and other floor space to be developed outwith the town centre also where its operation ordinarily requires.
- Smaller Town Centres such as Kinross which itself is a Principal Settlement should not necessarily be constrained, and local considerations in a regional context should be key. Appropriate development and investment should be encouraged."

**Scott Hobbs Planning for Scottish Enterprise (909506) PLAN2015\_350** requests that consideration is given to minor amendments to Policy 5 (Doc80) (changes shown in **bold**):

- "To protect and enhance the vitality, viability and vibrancy of city/town centres, strategies, plans, programmes and development proposals should focus land uses that generate significant footfall in city/town centres defined in the network of centres (below) ahead of other locations **subject to the requirements of Policy 3** (including retail, commercial leisure, offices, community and cultural facilities, civic activity and, where appropriate public buildings such as libraries, education and health care facilities)"

#### **TOWN CENTRE FIRST**

**sportscotland (905989) PLAN2015\_10** suggest some form of caveat should be provided in Policy 5A (Doc80), along the lines of "While Scottish Planning Policy (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."

**sportscotland (905989) PLAN2015\_11** supports the second last paragraph on page 33 (Doc80) (starting Community, health care and education facilities...). They suggest that the recognition that they are best located within the communities they serve could be emphasised more strongly - this would likely address their comments in relation to the town centre first approach (policy 5A) (Doc80). They suggest that the following text be inserted into Policy 5A:

- "While Scottish Planning Policy 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"

**Claudine Scott (907629) PLAN2015\_225** considers the Cupar North Strategic Development Area in TAYplan to have a potentially damaging impact on Cupar's town centre and therefore would like to see its deletion from the plan.

**Jennifer Hughes (844415) PLAN2015\_315** considers the Cupar North Strategic Development Area in TAYplan to have a potentially damaging impact on Cupar's town centre and therefore would like to see its deletion from the plan.

**Professor George Evans (846525) PLAN2015\_447** considers the Cupar North Strategic Development Area and related infrastructure, including the relief road, in TAYplan to have a potentially damaging impact on Cupar's town centre and therefore would like to see its deletion from the plan.

**Comrie Development Trust (910287) PLAN2015\_395** would like the following to be added to Policy 5A (Doc80), "a qualification at end which indicates that an exception to the policy may apply where footfall generating development is proposed to enable the preservation and enhancement of significant historic assets, especially those identified as being at risk".

**St Andrews Preservation Trust (910253) PLAN2015\_544** support the goals to revitalise town centres but consider there should be more coverage and direction/emphasis on obligations to analyse trends, e.g. balance of different types of commercial, retail, business, leisure and housing in town centres - audit processes are needed to identify good and bad trends.

**Andrew Dundas (821782) PLAN2015\_182** implies that a change to Policy 5 is required to ensure that there is no inhibition to change of use for city centre buildings into homes and for short term lettings and also to enable the exteriors of important buildings to be retained whilst the interiors are re-built for alternative uses.

**Scottish Property Federation (444087) PLAN2015\_510** implies changes should be made to 'promote the enhancement of leisure, hotel and restaurant offers in town centres'.

### **SUSTAINABLE TRANSPORT**

**Friends of the Earth Tayside (845935) PLAN2015\_424** suggest the inclusion of an explicit statement about the environmental benefits of co-locating services and facilities in urban centres which are easily accessible on foot, by bike and by public transport.

**Sustrans (346798) PLAN2015\_488** seek an explicit statement regarding the recognition of development encouraging parking management in town centres

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

#### **Context**

The Scottish Town Centres review reported in July 2013 and the subsequent Scottish Government policy response was issued soon after. These informed the TAYplan Main Issues Report (2014) (Doc56) which was prepared during autumn of 2013.

The TAYplan Main Issues Report (2014) (Doc56) consultation took place from 15 April to 27 June 2014. It sought views about land uses within the town centres first approach and how the network of centres and their functions should be approached. TAYplan Main Issues Report (2014) Main Issue 4: planning for vibrant town and city centres pages 21 to 24 (Doc56). Scottish Planning Policy (2014) (Doc84) was published in the closing days of the Main Issues consultation and clarified some of these matters.

During the summer of 2014, TAYplan considered both the new Scottish Planning Policy and responses to the Main Issues Report (2014) (Doc56) and these informed the Proposed Plan.

In the consultation of the Main Issues Report in 2014 (Doc56), 44 respondents supported the town centres first approach, whilst 4 respondents did not support it, including those who were promoting sites in a specific non-town centre location. 29 respondents supported the approach to identify a network of town centres whilst only 5 opposed this approach.

TAYplan, the constituent authorities and other partners considered how to approach this matter and the appropriate approach for a Strategic Development Plan. This included how to expand an approach, previously applied to leisure and retail, to other land uses and the implications of this. It also considered how the role and functions of centres should be considered. These matters are described in the Town Centres sections of TAYplan Topic Paper 4: Strategic Place Shaping (2015) (Doc106).

The town/city centres and commercial centres identified on Map 5 (Doc80) and also in the table in Policy 5 (Doc80) have not changed since the approved TAYplan (2012) Policy 7 (Doc16). Similarly the role of each centre e.g. Regional Centre, Sub-regional Centre, Larger Town Centre, Smaller Town Centre and Commercial Centre, have also not changed. The sequential approach is also the same. This is therefore a continuation of the existing approach.

However, where change has been made is that this approach is now applied to a wider range of land uses to reflect Scottish Planning Policy (2014) paragraph 63 (Doc84). This now applies to all high footfall land uses not just commercial leisure and comparison retail as before. This is a transformation in town centre policy that is happening across Scotland following the introduction of the town centres first approach in Scottish Planning Policy (Doc84) and in broader Scottish Government policy.

The Proposed Plan (2015) (Doc80) is the consequence of these deliberations and treads the narrow line between what is stated in national policy and the logical flexibilities and business of Local Development Plans. More detailed discussion of the thought processes behind this are contained in the town centre sections of TAYplan Topic Paper 4: Strategic Place Shaping (2015) pages 46-49 (Doc106).

## **Responses To Representations Seeking a change**

### **LOCATIONS OUTWITH CITY/TOWN CENTRES**

#### **Montagu Evans LLP for Wallace Land Investment Management (343111) PLAN2015\_250,**

The respondent appears to be concerned with the perceived limitations of locating development within the town/city centre given their promotion of land interests outwith Kinross town centre. Specific sites are a matter for the Local Development Plans and decisions through the development management process. The respondent has justified their approach on the basis of Scottish Planning Policy 2010 paragraph 45. Scottish Planning Policy 2014 has now set out a clearer approach to town centre land uses as part of a broader national policy framework (as outlined in the context section above).

The sequential approach and network of centres set out in Proposed Plan (2015) Policy 5 (Doc80) is clear. It implements a national policy framework that has been derived following significant national debate about the right direction and the practical implications of delivering vibrant and commercially healthy city and town centres.

Policy 5 (Doc80) promotes a sequential approach that focuses land uses that generate significant footfall in town centres first. When no appropriate site can be found within the centre, edge of town locations can be identified for development. This remains an appropriate system through which to consider development proposals and land allocations

for high footfall land uses. Therefore, TAYplan does not consider any change to Policy 5 (Doc80) necessary.

**Scott Hobbs Planning for Scottish Enterprise (909506) PLAN2015\_350**

As noted above Policy 5 does not prevent office development from taking place on identified sites outwith town centres but rightly recognises that town centres should be a key location for offices and that proper consideration should be given to the impacts that developing in other locations would have on the network of centres. The Proposed Plan should be read as a whole and therefore Policies 3 and 5 can be read together. TAYplan is therefore not persuaded that it is necessary or appropriate to change Policy 5.

**TOWN CENTRES FIRST**

**sportscotland (905989) PLAN2015\_10 and PLAN2015\_11**

TAYplan does not consider it necessary to add the points regarding community, educational and sporting facilities to Policy 5 Part A (Doc80). Policy 5 (Doc80) does not prevent community, health care, sport and education facilities from being sited outwith town centres and invariably this will be the case. Policy 5 sets out a rational framework to consider whether there is space to accommodate high footfall land uses within town centres (including local centres) and also for considering whether such choices will adversely affect the network of centres.

In terms of the best locations for community, educational and sporting facilities, TAYplan acknowledges that town centres will not always be the best locations for sports facilities including those that form part of schools and local clubs. It is true that availability of appropriate grounds/premises to accommodate facilities such as pitches and courts will be important factors. This may mean that they form part of local centres or other hubs". The proposed changes may bring further confusion and Proposed TAYplan (2015) page 33, column 3, 2<sup>nd</sup> paragraph (Doc80) acknowledges that 'Community, healthcare and education facilities are best located at the heart of the communities they serve'.

TAYplan considers that this offers a common sense and proportionate approach to dealing with such matters, which includes but are not solely related to sports facilities. TAYplan also recognises that the approach to green networks (Policy 8), managing TAYplan's assets (Policy 9 Part C) (Doc80) and shaping better quality places (Policy 2) and Policy 3 (Doc80) collectively support this approach. Therefore, TAYplan does not consider any change to Policy 5 (Doc80) is necessary.

**Claudine Scott (907629) PLAN2015\_225**

Considerable background research is undertaken to formulate any policy. In this case, Policy 5 has been derived from National policy thinking on town centres (see context above), which included a National Review of Town Centres, a Scottish Government Action Plan, Planning Advice Notes and a Toolkit (Scottish Planning Policy 2014, Paragraph 60 (Doc84)). The policy is a consequence of this and TAYplan considers this to reflect well the national approach.

The term 'larger town centre' is a descriptive term to differentiate the scale of town centres. It is not the result of specific test of size or footfall. This is a continuation of the same terminology used in approved TAYplan (2012) Policy 7. Development proposals and Local Development Plan site allocations will be considered by the respective Council using Policy 5. This does not prevent retail or other development taking place outside of town centres but it does ensure that all avenues have been explored to ensure that town centre land uses are focused in town centres first.

In terms of Cupar, Fife Council undertake a Retail Capacity Study (022/Extract/1) each year and in 2009, a Fife Household Survey (Doc40) was undertaken to understand the shopping patterns, behaviour and needs of Fife's residents. Cupar has been identified in the St Andrews & East Fife Local Plan as "District Town Centre". It is considered to be the service

centre for much of rural East Fife. The Strategic Development Area proposed at Cupar North proposes to enhance this function (Retail Capacity Study, 2014, CH2M HILL and Maria Francké Planning, Paragraph 2.3.3) (022/Extract/1).

TAYplan does not consider any change to Policy 5 (Doc80) necessary.

**Comrie Development Trust (910287) PLAN2015\_395, Andrew Dundas (821782) PLAN2015\_182, Professor George Evans (846525) PLAN2015\_447, St Andrews Preservation Trust (910253) PLAN2015\_544 , Jennifer Hughes (844415) PLAN2015\_315**

Policy 5 (Doc80) is aimed at having a vital, viable and vibrant town centre with a diversity of uses. It does not prevent homes from being located in the centre but does aim to generate significant footfall in the town centre, supporting daytime and evening economies. In Policy 5C (Doc80), the plan specifically states that Local Development Plan should recognise a number of facilities that support visitor numbers and day to night activity. This creates an integrated approach to the development of centres, allowing for a diversity of uses to promote central sites. Furthermore, the policy actually intends to prevent empty buildings and shop frontages in the centre by prioritising this location first in the sequential test. The locating of housing development proposals is undertaken through a rigorous process. The strategic development proposal at Cupar North is aimed at supporting the services and amenities that Cupar already provides. A rise in population will provide greater footfall to the town centre. The relief road proposed should provide a safer and more pedestrian friendly environment within the town, reducing congestion and allowing safer access to shops. In terms of the specific concerns regarding the Cupar North Strategic Development Area, the location of this proposed Strategic Development Area is dealt with in greater depth in Schedule 4 Summary of Unresolved Issues for Issue 011: Cupar North Strategic Development Area. Therefore, TAYplan does not consider any change to Policy 5 (Doc80) necessary.

**Scottish Property Federation (444087) PLAN2015\_510**

Policy 5 (Doc80) aims to enhance the vitality and health of town centres. It is not preventative in terms of leisure, hotels and restaurants. Indeed, it aims to provide more opportunities for day to night activities. A range of different facilities is therefore encouraged to encourage greater footfall and active streets. This is also supported by Policy 2: Shaping Better Quality Places (Doc80). Therefore, TAYplan does not consider any change to Policy 5 necessary (Doc80).

### **SUSTAINABLE TRANSPORT**

**Friends of the Earth Tayside (845935) PLAN2015\_424 and Sustrans (346798) PLAN2015\_488**

Policy 5 is aimed to encourage greater footfall in town centres so that it is more likely to be accessible on foot, bicycle and public transport. This works in conjunction with Policy 2: Shaping Better Quality Places (Doc80) which promotes walkable places and active travel. Therefore, TAYplan does not consider any change to Policy 5 necessary (Doc80).

**Sustrans (346798) PLAN2015\_488**

In terms of town centre parking management, this is an area that is the responsibility of the Councils.

## **Responses To Representations Supporting as written**

### **SUSTAINABLE TRANSPORT**

**Scottish Environment Protection Agency (835401) PLAN2015\_195**

TAYplan notes this support.

**OVERALL POLICY**

**Scottish Water (762198) PLAN2015\_270, Dundee Civic Trust (845127) PLAN2015\_283, Tactran (441235) PLAN2015\_362**

TAYplan notes this support.

**CONCLUSIONS**

Proposed Plan Policy 5 is reflecting the national policy shift to town centres first for a broad range of land uses as set out in Scottish Planning Policy 2014 (Doc84). The respondents have not provided any evidence to suggest that this approach is wrong or that an alternative could better deliver the vision. The policy framework set out continues that of the approved TAYplan (2012) whilst expanding to cover a broader range of land uses. The policy framework is not a rigid or preventative framework and is capable of differentiating between land uses that may best be located within the communities they serve such as some education, sport and community facilities. It is also capable of ensuring that high footfall land uses such as retail and leisure continue to adhere to a town centre first approach. It also recognises the broader importance town centres for non-retail land uses and as pivotal to the visitor and experience economies.

The Scottish Government has not raised any issues relating to the implementation of town centres first as proposed in Policy 5. TAYplan is therefore satisfied that the approach set out in the Proposed Plan remains appropriate. Therefore TAYplan does not propose any changes to this Policy.

**Reporter's conclusions:**

DPEA use only

**Reporter's recommendations:**

DPEA use only