

**REPORT TO: PLANNING AND TRANSPORTATION COMMITTEE
17 DECEMBER 2001**

**REPORT ON: SUSTAINABILITY APPRAISAL OF THE DRAFT DUNDEE AND
ANGUS STRUCTURE PLAN**

REPORT BY: DIRECTOR OF PLANNING AND TRANSPORTATION

REPORT NO: 708-2001

1 PURPOSE OF REPORT

1.1 The purpose of this Report is to advise the Committee of the outcome of the Sustainability Appraisal of the Draft Dundee and Angus Structure Plan and to outline how its recommendations have been reflected in the Finalised Plan.

2 RECOMMENDATIONS

- 2.1 It is recommended that the Committee :
- a Notes the contents of this Report and the contribution which the first stage of the Sustainability Appraisal has made to finalising the Structure Plan.
 - b Notes that the Consultants will be instructed to undertake the second stage Sustainability Appraisal of the Finalised Structure Plan which will assist in the consideration of the submitted plan by the Scottish Ministers in due course.

3 FINANCIAL IMPLICATIONS

3.1 The total cost of the Sustainability Appraisal is £9,300, half of which will be met by Angus Council and the remainder by the City Council. The City Council's contribution will be contained within the Planning and Transportation Department's 2001/2002 Revenue Budget.

4 LOCAL AGENDA 21 IMPLICATIONS

4.1 Given its wide ranging socio economic and environmental scope, the Sustainability Appraisal addresses all of the relevant key themes within Dundee's Local Agenda 21 and recommends ways in which the Structure Plan can contribute towards its aims.

5 EQUAL OPPORTUNITIES IMPLICATIONS

5.1 The Sustainability Appraisal puts forward a range of recommendations aimed at strengthening the Structure Plan's contribution towards the reduction of poverty and inequality and addressing the needs of vulnerable groups within society.

6 BACKGROUND

6.1 In the Report to the 30 April 2001 Committee on this matter (Report No 215-2001), Members were advised of the important role of the planning system in promoting sustainable development. National Planning Policy Guidance highlights the key role of Structure Plans in progressing towards sustainable development goals and the

Sustainability Appraisal process is a means of systematically assessing how effectively they are achieving this. However, it must be recognised that the Structure Plan, and the land use planning process generally, cannot alone achieve these goals and other agencies, partnerships and initiatives have a major responsibility in this regard. Examples of these are the LA 21 and Local Transport Strategies of the respective authorities.

- 6.2 It is also necessary to bear in mind the strategic planning focus of the Structure Plan. This is underpinned by the concept of the Strategic Community Interest. This concept is defined in the Structure Plan and distinguishes between issues requiring broad strategic planning action and those involving matters more suitably addressed at the local planning level. This has implications for the extent to which the Structure Plan can respond to issues highlighted by the Sustainability Appraisal and, alternatively, those situations where action is more appropriately pursued via Local Plans.

7 SUSTAINABILITY APPRAISAL OF THE DRAFT PLAN

- 7.1 The scoping stage of the Sustainability Appraisal process found that the Structure Plan addresses the majority of the sustainability criteria. However attention was drawn to certain issues not fully covered in the Plan, eg promoting community safety, energy efficiency, the recycling of aggregates and protecting archaeological resources. As anticipated, the testing process highlighted the range of positive and negative impacts relative to the sustainability criteria. These in turn generated a number of suggestions for strengthening environmental protection policies and a more proactive approach towards the key social, economic and environmental aims of the Plan. Significantly, the process also recognised where a decision has been made to accept a negative outcome in order to achieve a sustainability aim. An example of this is the decision not to maximise the output from potential brownfield housing opportunities in Dundee, in order to give priority to retaining population within the City. This is seen as being a valid approach provided suitable monitoring and review is undertaken to ensure the required outcome.
- 7.2 The Consultants recognised that an inevitable impact of the appraisal process is a requirement for plans to be more directive and to add to the safeguards and conditions on new development. This raises important questions for Dundee and Angus councils in seeking to respond to the Sustainability Appraisal, bearing in mind the Structure Plan's philosophy of Strategic Community Interest and the need to ensure that it retains its concise approach focusing on genuinely strategic land use planning issues. However, the consultants acknowledge that the Plan is not an all-embracing document in pursuing sustainable development and its impact on some of the sustainability criteria will be limited and peripheral.
- 7.3 It is also noted that given their strategic focus, the specific impact of particular policies will be difficult to predict and will depend on how they are implemented. As a result, the testing process indicates where this is the case and suggest how the sustainability issues involved can be addressed by suitably conditioning the policies involved. The Consultants emphasise that while the Sustainability Appraisal is not a substitute for a comprehensive impact assessment, it can point to the sustainability issues raised by individual proposals and suggest how these might be addressed.

8 RESPONSE TO THE APPRAISAL

- 8.1 The Sustainability Appraisal has provided a valuable contribution to the process of finalising the Structure Plan. The scoping process confirmed that the Plan covers most of the sustainability criteria but points to a limited number of matters requiring further consideration. The testing process demonstrates how the negative impacts of certain policies can be addressed and how the Plan overall can be made more robust. The appraisal has also assisted the process of assessing issues raised by consultation responses submitted in relation to the Draft Structure Plan. However, it must also be recognised that the Structure Plan will not be the most appropriate medium, in every instance, to pursue the action recommended.
- 8.2 The broad response to the appraisal recommendations can be grouped under the following headings:
- Those where the recommendation is accepted (in full or in part) and appropriate adjustments have been made to the wording of the Plan.
 - Those where the recommendation is seen as more applicable at the Local Plan level and will be reconsidered when reviewing the relevant Local Plans or, alternatively, they could be more suitably addressed by other strategies, processes or initiatives.
 - Those where the recommendation is not accepted and no further action is proposed.

The appendix to this Report provides further details of the appraisal recommendations and response.

- 8.3 The Sustainability Appraisal recommendations have resulted in a number of adjustments to the Structure Plan. By strengthening its strategy and policies, these adjustments will enhance the Plan's ability to achieve the sustainable development objectives. They include additions to and strengthening of the Guiding Principles which underpin the Plan's approach to sustainable development. They also include policy changes to take account of the need to regenerate disadvantaged areas and to promote rural diversification.
- 8.4 Other changes include ensuring that housing provision takes account of the need for affordable housing and for the special needs of the elderly and those with disabilities. Transportation related adjustments include the policy requirement for proposals to be supported, where appropriate, by Transport Assessments and Green Transport Plans. However, full details of the Sustainability Appraisal recommendations and their implications for the finalised Structure Plan are provided in the appendix to this Report. Copies of the full Sustainability Appraisal Report are available for inspection in the Members Lounges.

9 CONSULTATIONS

- 9.1 The Chief Executive, Director of Finance, Director of Support Services, Director of Corporate Planning, Director of Economic Development and Director of Environmental and Consumer Protection have been consulted and are in agreement with the contents of this report.

10 BACKGROUND PAPERS

10.1 None

Mike Galloway
Director of Planning & Transportation

Keith Winter
Policy & Regeneration Manager

7 December 2001

KW/AB/EJ SP5/6

Dundee City Council
Tayside House
Dundee

DUNDEE AND ANGUS STRUCTURE PLAN

**CONSULTATIVE DRAFT
FEBRUARY 2001**

SUSTAINABILITY APPRAISAL

DEVELOPMENT STRATEGY

Policy, Proposal or Paragraph:	Guiding Principles
---------------------------------------	---------------------------

Summary of Comment

Amend Guiding Principle to read: - Promote urban renewal and community regeneration and address rural *and urban* disadvantage *to reduce poverty and inequality*.

Assessment

Accepted that alteration can be made to incorporate urban disadvantage as well as rural disadvantage. Not sure about the wording “to reduce poverty and inequality” it may be more appropriate to use “to assist reduction of poverty and inequality”.

Recommendation

Amend text to read: “Promote urban renewal and community regeneration and address rural and urban disadvantaged to assist reduction of poverty and inequality.”

Summary of Comment

Incorporate new Guiding Principle: - Provide for local housing need, and ensure access to affordable housing.

Assessment

Accepted. Representations have been received in connection with the inclusion of a Policy on Affordable Housing (148/1/4). Inclusion of a policy relating to the need for affordable housing and special needs will ensure this issue is addressed through Local Plans where relevant.

Recommendation

Incorporate new Guiding Principle: - “Provide for local housing need and ensure access to affordable housing.”

Summary of Comment

Amend Guiding Principle to read: - Encourage the continued development and maintenance of viable and vital communities *with an appropriate range of essential facilities*.

Assessment

Agree with this, although exact wording could be clarified.

Recommendation

Amend text to read: - “Encourage the continued development and maintenance of viable and vital communities which support an appropriate range of facilities”

Summary of Comment

Incorporate new Guiding Principle: “Promote community safety and reduce community severance caused by road traffic.”

Assessment

Not accepted that this is a strategic land use matter.

Recommendation

No change.

Summary of Comment

Incorporate new Guiding Principle: "Promote access to the countryside for residents and visitors."

Assessment

Not accepted that this is a strategic land use matter.

Recommendation

No change.

Summary of Comment

Incorporate new Guiding Principle: - Promote the use of renewable energy and resources, the efficient use of energy and the reuse, recovery and recycling of waste.

Assessment

Accepted that this principle should be added.

Recommendation

Add new Guiding Principle: - "Promote the use of renewable energy and resources, the efficient use of energy and the reuse, recovery and recycling of waste."

Summary of Comment

Amend Guiding Principle to read: - "Promote environmentally sustainable use of existing and planned infrastructure and service capacity to support and facilitate development."

Assessment

Accepted change can be incorporated into Finalised text.

Recommendation

Amend text to read:- "Promote environmentally sustainable use of existing and planned infrastructure and service capacity to support and facilitate development."

Summary of Comment

Incorporate new Guiding Principle: - "Reduce pollution from developments and traffic. "

Assessment

To an extent this is already incorporated in an existing guiding principle.

Recommendation

No change.

Summary of Comment

Amend Guiding Principle to read: - “Protect and promote the quality and diversity of the built and natural environment, including the heritage, biodiversity and landscape of Dundee and Angus.”

Assessment

Accepted. Representations have been received relating to the rewording of this principle (139/1/1, 168/1/4). No problem with incorporating this amendment to the principle

Recommendation

Amend principle to read: - “Protect and enhance the quality and diversity of the natural, built and historic environment including the heritage, biodiversity and landscape of Dundee and Angus.”

Summary of Comment

Incorporate new Guiding Principle: - “Plan for climate change by maintaining existing undeveloped coasts, and protecting flood plains from development”

Assessment

Not convinced about suggested text but agree a principle should be included along these lines.

Recommendation

Add new Guiding Principle: - “Maintain existing undeveloped coasts and locate new development away from areas at risk from flooding.”

DUNDEE AND ANGUS STRUCTURE PLAN

**CONSULTATIVE DRAFT
FEBRUARY 2001**

**SUSTAINABILITY APPRAISAL
ENCOURAGING EMPLOYMENT**

Policy, Proposal or Paragraph:	Employment Policy 1
---------------------------------------	----------------------------

Summary of Comment

(a) Although the Draft Report of Survey chapter on employment land concludes, “regeneration of brownfield land and existing industrial estates remains a priority” this is not directly reflected in the first bullet point in EP1. Also it is not clear if the new allocations are based on identified need. Not clear how the allocations in bullet 1 and 5 will impact on a range of criteria, including regeneration, access to employment, trip generation and land take. This is because no specific criteria are suggested. It is assumed that the Western Gateway masterplan will produce specific criteria for that area.

Structure Plan should specify that LPs develop criteria for the allocations in bullet point 1 and the site near Arbroath in bullet point 5 to prioritise

- Ongoing assessment of need
- Use of brownfield sites
- Trip reduction
- Support for regeneration and access from disadvantaged areas
- Protection of landscape, wildlife areas and archaeological resources.

Protection of community facilities and avoidance of community severance

(b) The exact impacts of the existing sites referred to in bullet points 2,3 and 4 on trip generation, regeneration of disadvantaged areas, landscape, wildlife areas, and archaeological resources are also unclear because of lack of specific information about these sites. Other impacts will depend on the precise nature of the developments on the sites. It is recommended that LPs produce development briefs for these sites to take account of policies contained in the plan, take account of policies contained in the plan, particularly;

- Design for energy and water saving
- Provision of recycling facilities and reuse of
- Provision of recycling facilities and reuse of aggregates
- Transport Assessments, development of green travel plans
- Use of local staff by large employers
- Community safety

Necessary measures to protect wildlife habitats, landscape quality and archaeological resources

Assessment

Accept need for clarification of Policy and priorities. It would seem sensible to separate this whole Policy out and to relate the Policies more closely to the text. The Policy should also be more relevant to the strategic issues, identifying the role of the Local Plans in application.

Recommendation

At end of paragraph 3.7 add: -

'The Councils will continue to monitor the take up of employment land and bring forward new allocations. These will be identified and developed through the appropriate Local Plans, in conjunction with the relevant economic strategy for the area. Account will be taken of need, choice, accessibility and environment issues including impact, energy conservation and travel options.'

Sustainability Appraisal Encouraging Employment

Amend Employment Policy 1 to read: -

EMPLOYMENT POLICY 1: EMPLOYMENT LAND SUPPLY

In order to maintain an effective five year supply of marketable land, Local Plans will identify sites to maintain the following provision of land for employment use*:-

- At least 110 hectares in Dundee,
- At least 10 hectares each in Arbroath, Forfar and Montrose,
- At least 5 Hectares in Brechin, and
- Up to 5 hectares in Carnoustie, Kirriemuir and other settlements.

Local plans will establish the criteria for development briefs, to be prepared in support of major land allocations.

Amend Employment Policy 2 to read: -

EMPLOYMENT POLICY 2: EXISTING EMPLOYMENT AREAS

The Councils will continue to safeguard and promote land for employment use* at: -

- the existing employment sites at Kingsway West, Claverhouse, West Pitkerro/Linlathen, Dundee; Kirkton, Arbroath; Orchardbank, Forfar; Business Park, Brechin; Forties Road, Montrose, and
- other high quality well located brownfield employment sites, which are appropriate for regeneration and redevelopment.

*Class 4, 5 and 6 Uses as defined in the Town and Country Planning (Use Classes)(Scotland) Order 1997.

Insert supporting text and New Policy to read: -

“Some employment uses have particular site requirements and such sites should be well related to existing infrastructure. Opportunity exists, for example, to meet the needs of larger users at Linlathen in the east of Dundee linking development to the local workforce and the urban fabric. The Dundee Western Gateway allows for the development of a specialist high amenity facility to attract and retain companies wishing a prestigious location. The proposal to incorporate this site within a major integrated development project creates the opportunity to utilise the existing physical and economic infrastructure and to provide a well designed environment within which to live and work in close proximity.

Similarly the planned upgrading of the A92 between Dundee and Arbroath provides potential business economic benefits allowing better access to existing and new businesses in the Angus Coastal Corridor and better links with local and other markets. The provision of a site for employment development to the west of Elliot Estate, Arbroath capitalises on the opportunity to add to the range and quality of employment land in Arbroath in an attractive location. This proposed site can provide a high standard of environment making full use of landscape features and taking account of the location of the site adjacent to existing business uses on the edge of the town.

EMPLOYMENT POLICY 3: GREENFIELD SITES

Local Plans will identify and safeguard land for future employment use *: -

- the site at Linlathen, Arbroath Road, Dundee as a medium sized industrial site for single user developments(s) of between 10 and 30 hectares,
- up to 50ha of land to the west of Dundee in the 'Western Gateway' area for high quality business, technology and associated development incorporating a high amenity/strategic site and extension to the Dundee Technology Park (Balgarthno);and
- a site to the west of Elliot Estate, Arbroath, which establishes a high quality integrated business and industrial development accessible to the upgraded A92 and with strong connections to existing business areas in Arbroath.”

Policy, Proposal or Paragraph:	Employment Policy 2
---------------------------------------	----------------------------

Summary of Comment

The sustainability of this proposal depends to a great degree on the exact location of the site and the terms of the development framework. It is noted also that the Western Gateway masterplan dealt with in Housing Proposal 1 will have a significant impact on the sustainability of this proposal.

It is recommended that the LP include the following issues in the development framework;

- site location to minimise impact on trip generation, landscape, wildlife habitats, archaeological resources and cohesiveness of local communities
- site design and development to take account of safety, quality of design, access by public transport walking and cycling, reuse of materials, recycling and design and energy and water saving
- large individual users to be encouraged to employ local people and to develop green travel plans.

Assessment

The Councils recognise the significance of the development of the Strategic Site within the Dundee Western Gateway area. The aim is to have an integrated development framework for the area to ensure the timeous implementation of various aspects of the Dundee Western Gateway Concept Plan (previously referred to as Dundee Western Gateway Masterplan). The various impacts of the potential Strategic Site will be assessed within the development framework specifically prepared for the site. The Structure plan text and policy will be modified to incorporate these changes.

Recommendation

Add new paragraph to supporting text to Strategic Site Policy

“The councils will work with Scottish Enterprise Tayside (SET) to identify, develop and promote a suitable site. Locate in Scotland will be requested to consider the suitability of the site for international inward investment proposals. The involvement of SEPA and SNH will be integral to the assessment of a site and its subsequent development. Issues to be considered will include environmental impact, access, drainage, design and energy conservation.”

Amend Policy text on the Strategic Site: -

“The Dundee and Angus Structure Plan in conjunction with SET will promote the allocation of a large high amenity strategic site within the 'Western Gateway' area of Dundee for international marketing for inward investment purposes. This site may be suitable for development by a single user or a cluster of users.

The appropriate Local Plan will identify the site and LIS will be requested to support its promotion and to assist in the establishment of a broad development framework reflecting the environmental assets of the area.”

Policy, Proposal or Paragraph:	Employment Policy 3
---------------------------------------	----------------------------

Summary of Comment

The impact of this policy depends a great degree on specific sites allocated and development control criteria established by Local Plans. The policy does give protection to landscape, coast, wildlife areas, and areas at risk of flooding or erosion. However there is no specific mention of the trip generating potential of tourism, or encouragement of tourism based on walking, cycling and public transport. Nor is the potential for agricultural diversification into tourism covered.

It is recommended that the policy give positive support to tourism based on walking, cycling and public transport and to agricultural diversification into tourism (subject to existing conditions).

It is recommended that LPs include the following issues in development control criteria;

Sustainability Appraisal Encouraging Employment

- site location to minimise impact on trip generation, landscape, wildlife habitats, archaeological resources and cohesiveness of local communities
- site design and development to take account of safety, quality of design, access by public transport, walking, cycling, reuse of materials, recycling and design for energy and water saving
- large individual users to be encouraged to employ local people and to develop green travel plans.

Assessment

Accept the need to encourage non car access for leisure and recreation activities. The importance of walking and cycling is raised under 266/1/2, 149/1/35 and 149/1/37 and modifications will be made to the plan to address these issues. The potential for Green Tourism will also be recognised.

The comments regarding farm diversification are accepted. This matter will be specifically addressed as part of a wider review of Rural Employment and its associated policy, with a number of text and policy modifications.

Improvements to the level of public transport services is a more difficult issue to address. Among Angus Council's objectives is to seek to halt the decline and accentuate the role of public transport services, particularly as a means of stemming rural depopulation and supporting the provision of other services and employment opportunities.

Public transport provision in rural areas of Angus has been improved over recent years as a result of the Rural Transport Grant which has greatly assisted in funding new services to meet the needs of rural residents. However it is recognised that much of the tourism industry in Angus particularly in the more remote upland areas remains largely car based. Whilst this is likely to remain the case, opportunity will be taken wherever possible to encourage walking, cycling and public transport services to link with tourism, leisure and recreational activities or facilities.

Recommendation

Modify text and Employment Policy 3 to promote walking cycling and horse riding (see ref 266/1/12, page 70).

Modify Rural Employment text and policy (see modifications under Employment Policy 4, page 93).

Modify text and policy to incorporate activity holidays, green tourism and promotion of the natural heritage (see 167/1/5, page 86).

Policy, Proposal or Paragraph:	Employment Policy 4
---------------------------------------	----------------------------

Summary of Comment

May benefit disadvantaged areas, and benefit those most economically disadvantaged, but this depends on the definition of economic need. The impact on rural diversification depends on the type of business. Might have adverse impact on the viability of urban centres by allowing development out of centres. Structure Plan should define economic need, for example (i) high unemployment (say x% above Scottish average); (ii) significant underemployment (iii) important economic uses that require countryside locations Include agricultural diversification within the definition of economic need. Specify certain types of development will not be allowed under this policy, for example those covered in TCRP4 and 5.

Assessment

Accept problems with concept of economic need - measures proposed by CAG not realistic at this level. Perhaps this is an issue of scale - need is meant to imply a location criterion e.g. relating to raw materials but this is not necessarily the case e.g. teleworking. The main point is that scale of development is appropriate and once these breached general criteria would come in to play and direction towards the towns. The aim of this policy is to be flexible and accommodate the exceptions, which could be accommodated without detriment. The issue of public transport is hard to incorporate given the rarity of suitable public transport within the rural areas and the current requirement to travel for work anyway for most rural dwellers. Small scale operations are likely to be dependent on car borne workers and providing an alternative bus/taxi service is a high price to pay for being a rural based business.

Summary of Comment

The impact of the policy on wildlife and landscape depends on the definition of “local environmental quality”. Specify that local environmental quality includes landscape and wildlife habitats.

Assessment

The councils accept the concerns and the desire to see this policy strengthened to ensure adverse impacts are fully addressed. The Angus Local Plan has detailed policies relating to development, including drainage and infrastructure, in rural area which would apply to any development proposal.

Summary of Comment

Could lead to trip generation; even a local workforce is likely to travel by car to a development in a rural area. Make second condition more specific by specifying public transport connections. Require any large trip generators to prepare a green travel plan. Consider putting a ceiling on the size of developments as measured by the trips generated per day.

Assessment

Do not accept this is viable. Most rural dwellers are dependent on cars and do not work locally. This will continue to be a conundrum - to retain a populous rural area commuting is inevitable until a viable alternative is available. The high cost of rural transport penalises those on lower incomes that have little choice of where they work.

Recommendation

Taking account of the comments made by the Scottish executive, respondents and the Sustainability Appraisal it is proposed that the Rural Employment section is re-drafted to address the issues raised and to clarify policy as it applies to the rural area. Amend supporting text and Rural Employment Policy to read: -

“The majority of the Structure Plan area is rural, comprising a network of towns and villages set in a diverse and productive countryside. The coastal fringe contains some of the best agricultural land in Scotland, which, with Strathmore, a fertile valley between the Sidlaw Hills and the Angus Glens, is a nationally important area for agriculture. The Angus Glens are much less fertile with only a scattered population in small villages or associated with the large estates that dominate this upland area.

Agriculture, which remains the mainstay of much of the rural economy, remains under pressure for change resulting in a continuing decline in the workforce directly and indirectly employed in the sector. Other traditional production and manufacturing sectors have also experienced declining employment. Rural areas have become dependent on service sector employment and, in the more accessible areas, on commuting to maintain or increase their population. There is also growing integration between town and country as small rural facilities are closed or centralised which can disadvantage those without good access to transport (public and private).

Whilst Dundee city and the main Angus towns will continue to be the focus for the majority of employment related development, there is clearly a need to encourage economic activity in the rural areas. The importance of rural communities and the contribution they make to both the local and wider economy should not be under-estimated. But the recent difficulties facing rural businesses, particularly agriculture and tourism, demonstrate the continuing fragility of the rural economy and related jobs.

In accordance with National Planning Policy Guideline 15 opportunities to support employment in the countryside e.g. through the diversification of farming and forestry, small-scale tourism projects and informal recreation will generally be supported. This will be an important element in maintaining the rural population

Sustainability Appraisal Encouraging Employment

base - especially in the remoter areas. The scale of such development is more appropriate to local plans, which will attempt to foster such proposals where it can be accommodated in a sustainable and environmentally acceptable manner.

EMPLOYMENT POLICY: RURAL EMPLOYMENT

Proposals for economic or employment related development in the rural areas will be supported where they do not adversely affect local environmental quality.

In determining development proposals account should be taken of: -

- contribution to diversification of the local economic base,
 - integration with the existing pattern of development,
 - availability of infrastructure including access to transport connections,
 - availability of local workforce to minimise travel to work journeys; and
 - the environmental policies of this plan.
-

DUNDEE AND ANGUS STRUCTURE PLAN

**CONSULTATIVE DRAFT
FEBRUARY 2001**

SUSTAINABILITY APPRAISAL

HOUSING AND COMMUNITIES

Policy, Proposal or Paragraph:	Housing and Communities Policy 1
---------------------------------------	---

Summary of Comment

Housing Policy 1 should clearly indicate that the main aim is to provide housing within existing settlements, in order to assist in preserving land as a resource towards achieving more sustainable forms of development.

Assessment

It is considered that the inclusion of additional words in Housing Policy 1 to specifically cover this issue is unnecessary. The Policy as proposed to be changed makes clear reference to the need for Local Plans to allocate sites in accordance with the Strategy of the Structure Plan. There are a range of guiding principles which must equally be taken into account. The Development Strategy, from paragraph 2.28 (Settlement Strategy), makes it clear that one of the principles towards achieving sustainable development is the focus of new development on existing settlements. This element of the strategy is also referred to at paragraph 4.17 of the draft Written Statement.

Recommendation

No change.

Policy, Proposal or Paragraph:	Housing and Communities Policy 2
---------------------------------------	---

Summary of Comment

- (a) Housing Policy 2 should require Dundee Local Plan to undertake monitoring of the impacts of the policy and review regularly. Issues that should be considered are amount of greenfield land take, and impact on; population loss, travel patterns, vitality of the city centre, and disadvantaged areas (particularly those where the pre 1919 tenement properties are located). The Local Plan should endeavour to use less than the maximum numbers of greenfield allocations allowed outside of Western Gateway.
- (b) Ensure that the “appropriate policy framework” for promotion of houses rather than flats referred to in Housing Policy 2, undertakes appropriate studies to determine the local demand and keep it under review.

Assessment

- (a) and (b) The need for monitoring of the approach adopted in the Dundee and Angus Structure Plan regarding the future provision of housing in Dundee is accepted. The addition of specific text referring to the need for review of the elements of the housing led approach in the 'Dundee and South Angus Market Area' section would provide a marker for Local Plans on this matter.**
-

Summary of Comment

- (c) Housing Policies 2 and 4 should ensure that developments, including transport infrastructure and forestry take account of the protection of habitats and landscapes.
- (d) Housing Policies 2 and 4 should ensure that the wildlife value of brownfield sites is assessed prior to consideration of development proposals.

Assessment

- (c) and (d) Alterations to the text under 'Meeting the Housing Allowances' now indicate a range of matters which should be taken into account by Local Plans when considering the suitability of sites for housing development. This point is broadly covered by those changes.
-

Summary of Comment

- (e) Need to ensure that housing provision takes account of the need for affordable housing and the special needs of the elderly and disabled.

Assessment

- (e) It is acknowledged there is a need for development plan policy to set the context for the provision of affordable and special needs housing as part of new housing development. The advice in NPPG3 states that any such requirements on developers should be based on clear evidence of need. In Dundee and Angus at the current time assessments of housing needs are not yet complete, but in order to provide an appropriate framework should specific housing needs be identified, a policy and associated text should be added to the Housing and Communities Chapter. The inclusion of a Policy relating to the need for affordable and special needs housing will ensure this issue is addressed through Local Plans where relevant. (See also Chapter 4 : Housing and Communities, Omission - Affordable Housing Policy, Scottish Homes)

Recommendation

No change to Housing Policy 2 in response to these comments .However, the following text will be added to the end of paragraph 4.25 of the draft Structure Plan to address points (a) and (b):

" The various elements of the housing led approach to addressing population and housing issues in Dundee will be kept under close review in order to assess their impact and ensure their continuing relevance."

And note the changes proposed to paragraph 4.19 of the draft Plan under Chapter 4: Housing and Communities, General which address points (c) and (d) as follows:

"In allocating land for new housing development, Local Plans should have regard to the natural, built and historic environment, including landscape character and capacity to accommodate development; siting and design; as well as a range of more detailed matters. Documents such as PAN 44 " Fitting New Housing Development into the Landscape" and PAN 36 'Siting and Design of New Housing in the Countryside' provide guidance and examples of good practice. Local Plans will also consider..."

In relation to affordable and special needs housing, note the inclusion of the following Text and Policy to the end of the Housing and Communities Chapter:

"NPPG3 'Land for Housing' (Revised 1996) highlights the role of private sector developers in satisfying a range housing requirements. However it is acknowledged that the operation of the private housing market may not meet the housing needs of all people. It is necessary and desirable therefore to support the provision of quality housing which meets a range of differing needs to promote sustainable, balanced communities. The planning system has a part to play, along with other agencies, in ensuring that everyone has access to quality housing. Affordability is defined by the extent to which local people can afford to pay market prices/rents. It is important that any affordable housing stock remains affordable for successive as well as initial occupants, and this can be secured through legal agreements. Strategies for housing to meet special needs, including the disabled, frail, elderly and people with sight and hearing impairments, are set out in Joint Community Care Plans agreed between the Councils and the relevant Health Trusts and Community Scotland. Although the planning system can assist, policies in development plans must be based on clear evidence of local need, and housing needs studies have been commissioned by both Councils to augment existing information. Where studies identify specific needs, Local Plans will make provision to ensure those requirements can be met."

HOUSING POLICY 6: AFFORDABLE AND SPECIAL NEEDS HOUSING

"In areas of need identified through relevant studies, affordable and/or special needs housing should be provided within new housing developments by agreement with private developers and housing agencies. Local Plans will outline the level and location of identified housing needs, and set out appropriate mechanisms to secure such provision taking account of local site and market conditions."

Policy, Proposal or Paragraph: Housing and Communities Policy 2- South Angus
--

Summary of Comment

- (a) Require the Angus LP to adopt the sequential approach to the provision of housing land, to maximise opportunities for conversions and windfalls, to undertake urban capacity studies where appropriate, to consider whether it is appropriate to renew existing planning permissions over 5 years old, and to keep vacancy rates under review.

Assessment

- (a) The Development Strategy of the Dundee and Angus Structure Plan seeks to direct new development to existing settlements as a priority. It is not considered necessary to include any further direction to Local Plans in the Policy itself.

Summary of Comment

- (b) Housing Policies 2 and 4 should ensure that developments, including transport infrastructure and forestry take account of the protection of habitats and landscapes.
(c) Housing Policies 2 and 4 should ensure that the wildlife value of brownfield sites is assessed prior to consideration of development proposals.

Assessment

- (b) and (c) Alterations to the text under 'Meeting the Housing Allowances' now indicate a range of matters which should be taken into account by Local Plans when considering the suitability of sites for housing development. This point is broadly covered by those changes.

Summary of Comment

- (d) Need to ensure that housing provision takes account of the need for affordable housing and the special needs of the elderly and disabled.

Assessment

- (d) It is acknowledged there is a need for development plan policy to set the context for the provision of affordable and special needs housing as part of new housing development. The advice in NPPG3 states that any such requirements on developers should be based on clear evidence of need. In Dundee and Angus at the current time assessments of housing needs are not yet complete, but in order to provide an appropriate framework should specific housing needs be identified, a policy and associated text should be added to the Housing and Communities Chapter. The inclusion of a Policy relating to the need for affordable and special needs housing will ensure this issue is addressed through Local Plans where relevant. (See also Chapter 4 : Housing and Communities, Omission - Affordable Housing Policy, Scottish Homes)

Recommendation

No change proposed to Housing Policy 2 in response to these comments. However, note the changes proposed to paragraph 4.19 of the draft Plan under Chapter 4 : Housing and Communities, General which address points (b) and (c) as follows:

"In allocating land for new housing development, Local Plans should have regard to the natural, built and historic environment, including landscape character and capacity to accommodate development; siting and design; as well as a range of more detailed matters. Documents such as PAN 44 " Fitting New Housing Development into the Landscape" and PAN 36 'Siting and Design of New Housing in the Countryside' provide guidance and examples of good practice. Local Plans will also consider..."

In relation to affordable and special needs housing, note the inclusion of the following text and Policy to the end of the Housing and Communities Chapter:

"NPPG3 'Land for Housing' (Revised 1996) highlights the role of private sector developers in satisfying a range housing requirements. However it is acknowledged that the operation of the private housing market may not meet the housing needs of all people. It is necessary and desirable therefore to support the provision of quality housing which meets a range of differing needs to promote sustainable, balanced communities. The planning system has a part to play, along with other agencies, in ensuring that everyone has access to quality housing. Affordability is defined by the extent to which local people can afford to pay market prices/rents. It is important that any affordable housing stock remains affordable for successive as well as initial occupants, and this can be secured through legal agreements. Strategies for housing to meet special needs, including the disabled, frail, elderly and people with sight and hearing impairments, are set out in Joint Community Care Plans agreed between the Councils and the relevant Health Trusts and Community Scotland. Although the planning system can assist, policies in development plans must be based on clear evidence of local need, and housing needs studies have been commissioned by both Councils to augment existing information. Where studies identify specific needs, Local Plans will make provision to ensure those requirements can be met."

HOUSING POLICY 6: AFFORDABLE AND SPECIAL NEEDS HOUSING

In areas of need identified through relevant studies, affordable and/or special needs housing should be provided within new housing developments by agreement with private developers and housing agencies. Local Plans will outline the level and location of identified housing needs, and set out appropriate mechanisms to secure such provision taking account of local site and market conditions."

Policy, Proposal or Paragraph: **Housing and Communities Policy 4**

Summary of Comment

- (a) Require the Angus LP to adopt the sequential approach to the provision of housing land, to maximise opportunities for conversions and windfalls, to undertake urban capacity studies where appropriate, to consider whether it is appropriate to renew existing planning permissions over 5 years old, and to keep vacancy rates under review.

Assessment

- (a) The Development Strategy of the Dundee and Angus Structure Plan seeks to direct new development to existing settlements as a priority. It is not considered necessary to include any further direction to Local Plans in the Policy itself.
-

Summary of Comment

- (b) Housing Policies 2 and 4 should ensure that developments, including transport infrastructure and forestry take account of the protection of habitats and landscapes.
(c) Housing Policies 2 and 4 should ensure that the wildlife value of brownfield sites is assessed prior to consideration of development proposals.

Assessment

- (b) and (c) Alterations to the text under 'Meeting the Housing Allowances' now indicate a range of matters which should be taken into account by Local Plans when considering the suitability of sites for housing development. This point is broadly covered by those changes.
-

Summary of Comment

- (d) Need to ensure that housing provision takes account of the need for affordable housing and the special needs of the elderly and disabled.

Assessment

- (d) It is acknowledged there is a need for development plan policy to set the context for the provision of affordable and special needs housing as part of new housing development. The advice in NPPG3 states that any such requirements on developers should be based on clear evidence of need. In Dundee and Angus at the current time assessments of housing needs are not yet complete, but in order to provide an appropriate framework should specific housing needs be identified, a policy and associated text should be added to the Housing and Communities Chapter. The inclusion of a Policy relating to the need for affordable and special needs housing will ensure this issue is addressed through Local Plans where relevant. (See also Chapter 4 : Housing and Communities, Omission - Affordable Housing Policy, Scottish Homes)

Recommendation

No change proposed to Housing Policy 4 in response to these comments. However, note the changes proposed to paragraph 4.19 of the draft Plan under Chapter 4 : Housing and Communities, General which address points (b) and (c) as follows:

"In allocating land for new housing development, Local Plans should have regard to the natural, built and historic environment, including landscape character and capacity to accommodate development; siting and design; as well as a range of more detailed matters. Documents such as PAN 44 " Fitting New Housing Development into the Landscape" and PAN 36 'Siting and Design of New Housing in the Countryside' provide guidance and examples of good practice. Local Plans will also consider..."

In relation to affordable and special needs housing ,note the inclusion of the following Text and Policy to the end of the Housing and Communities Chapter:

"NPPG3 'Land for Housing' (Revised 1996) highlights the role of private sector developers in satisfying a range housing requirements. However it is acknowledged that the operation of the private housing market may not meet the housing needs of all people. It is necessary and desirable therefore to support the provision of quality housing which meets a range of differing needs to promote sustainable, balanced communities. The planning system has a part to play, along with other agencies, in ensuring that everyone has access to quality housing. Affordability is defined by the extent to which local people can afford to pay market prices/rents. It is important that any affordable housing stock remains affordable for successive as well as initial occupants, and this can be secured through legal agreements. Strategies for housing to meet special needs, including the disabled, frail, elderly and people with sight and hearing impairments, are set out in Joint Community Care Plans agreed between the Councils and the relevant Health Trusts and Community Scotland. Although the planning system can assist, policies in development plans must be based on clear evidence of local need, and housing needs studies have been commissioned by both Councils to augment existing information. Where studies identify specific needs, Local Plans will make provision to ensure those requirements can be met."

HOUSING POLICY 6: AFFORDABLE AND SPECIAL NEEDS HOUSING

In areas of need identified through relevant studies, affordable and/or special needs housing should be provided within new housing developments by agreement with private developers and housing agencies. Local Plans will outline the level and location of identified housing needs, and set out appropriate mechanisms to secure such provision taking account of local site and market conditions."

Policy, Proposal or Paragraph: Housing and Communities Policy 5

Summary of Comment

Clarify that the Housing Policy 5 aims to support existing rural communities. Indicate that the sequential approach should still be applied.

Assessment

Changes suggested to Housing Policy 5 to take account of the range of comment received also address these points either in text or in the Policy itself. No further change is necessary.

Recommendation

No change.

DUNDEE AND ANGUS STRUCTURE PLAN

**CONSULTATIVE DRAFT
FEBRUARY 2001**

SUSTAINABILITY APPRAISAL

DUNDEE WESTERN GATEWAY

Policy, Proposal or Paragraph:

Dundee Western Gateway

Summary of Comment

- (a) Require Transport Assessment where developments will have significant implications.
- (b) Require developments likely to generate significant trips to include Transport Assessments to minimise safety and severance impacts.
- (c) Require that large trip generating employment proposals produce a green transport plan
- (d) Ensure that developments take account of the protection of habitats and landscapes.
- (e) Ensure development protects heritage and archaeological resources.
- (f) Require Local Plans to ensure that development proposals protect and enhance community facilities and avoid severance.
- (g) Ensure where appropriate new developments include recycling facilities.
- (h) Require Local Plans to take account of community safety.
- (i) Require Local Plans to encourage development to be energy efficient.

Assessment

The Structure Plan establishes Dundee Western Gateway as a focus for additional land release for housing and employment development to extend locational choice as part of an integrated approach to the further development of Dundee as a strong regional centre. These proposals are a key part of the Structure Plan's strategy for sustainable development in the Dundee and Angus area. The Dundee Western Gateway Concept Plan sets out the philosophy and principles to guide development within the Gateway area in an integrated manner.

- (a)-(c) The Dundee Western Gateway Concept Plan and Transport Policy 4 of the Finalised Structure Plan require that Transport Assessments and Green Transport Plans be prepared in support of large scale development proposals such as that at Dundee Western Gateway.
- (d) and (e) The Concept Plan broadly addresses the need to accommodate development in a manner which has regard to the landscape setting in the Western Gateway area, and requires new or enhance planting to take account of the desire to enhance biodiversity in the area. More detailed matters will be dealt with as part of the allocation of sites through the relevant Local Plans and through the preparation of site specific development briefs. Furthermore, where environmental assessments are required in support of development proposals issues of natural and built heritage will be scrutinised.
- (f) The Concept Plan addresses the need for a range of community facilities to be provided in accessible locations to meet the needs of people living and working in the area. The precise location of these facilities will be determined through the allocation of specific sites through the relevant Local Plan and through the preparation of development briefs for sites.
- (g)-(i) These comments relate to detailed matters which are not appropriate for inclusion in the Structure Plan. They will be addressed at more detailed stages of site planning and development.

Recommendation

No change.

DUNDEE AND ANGUS STRUCTURE PLAN

**CONSULTATIVE DRAFT
FEBRUARY 2001**

SUSTAINABILITY APPRAISAL

TOWN CENTRES AND RETAILING

Policy, Proposal or Paragraph: **Town Centres and Retailing Policy 1**

Summary of Comment

Given the benefits associated with maintaining existing centres, this policy is generally sustainable. However, care needs to be taken to minimise potential negative impacts of developments. Consideration should be given to comments in the policy scoping section of the Sustainability Appraisal on community viability, safety, equity, energy, resources, reducing trips and built environment. In addition, the wildlife quality of brownfield sites should be investigated prior to development and reference should be made to the Dundee Urban Design Strategy.

Assessment

Noted. However, these matters are more appropriately addressed by Local Plans and through the process of considering specific development proposals.

Recommendation

No change.

Policy, Proposal or Paragraph: **Town Centres and Retailing Policy 2**

Summary of Comment

Given the benefits associated with maintaining existing centres, this policy is generally sustainable. However, care needs to be taken to minimise potential negative impacts of developments. Consideration should be given to comments in the policy scoping section of the Sustainability Appraisal on community viability, safety, equity, energy, resources, reducing trips and built environment. In addition, the wildlife quality of brownfield sites should be investigated prior to development and reference should be made to the Dundee Urban Design Strategy.

Assessment

Noted. However, these matters are more appropriately addressed by Local Plans and through the consideration of specific development proposals.

Recommendation

No change.

Policy, Proposal or Paragraph: **Town Centres and Retailing Policy 3**

Summary of Comment

This policy is generally sustainable. Consideration should be given to comments in the policy scoping section of the Sustainability Appraisal on community viability, safety, equity, energy, resources, reducing trips and built environment. Reference should be made to the Dundee Urban Design Strategy.

Assessment

Noted. However, these matters are more appropriately addressed by Local Plans and through the consideration of specific development proposals.

Recommendation

No change.

Policy, Proposal or Paragraph: Town Centres and Retailing Policy 4
--

Summary of Comment

The policy incorporates the sequential approach to proposals for out of centre retail developments. While such developments can impact on a range of sustainability issues, the requirement to ensure consistency with other Plan policies should provide protection. The condition on transport access should be expanded to require a Transport Assessment. In addition the recommendations elsewhere in the Sustainability Appraisal relating to wildlife, landscape and transport should be adopted here.

Assessment

The recommendations relating to wildlife and landscape would be more appropriately addressed by applying the general wildlife and landscape protection policies of the Environmental Resources Chapter to relevant proposals. However Local Plans will consider how to incorporate more specific policy provisions in respect of these matters. With regard to transport access and related matters there would be merit in providing for the submission of Transport Assessments and Green Travel Plans.

Recommendation

Incorporate policy requirement for the submission of Transport Assessments and Green Transport Plans in support of out of centre retail developments where appropriate.

Policy, Proposal or Paragraph: Town Centres and Retailing Policy 5
--

Summary of Comment

The policy incorporates the sequential approach to proposals for new leisure and commercial developments. While such developments can impact on a range of sustainability issues, the requirement to ensure consistency with other Plan policies should provide protection. The condition on transport access should be expanded to require a Transport Assessment. In addition the recommendations elsewhere in the Sustainability Appraisal relating to wildlife, landscape and transport should be adopted here.

Assessment

The recommendations relating to wildlife and landscape would be more appropriately addressed by applying the general wildlife and landscape protection policies of the Environmental Resources Chapter to relevant proposals. However Local Plans will consider how to incorporate more specific policy provisions in respect of these matters. With regard to transport access and related matters there would be merit in providing for the submission of Transport Assessments and Green Travel Plans.

Recommendation

Incorporate policy requirement for the submission of Transport Assessments and Green Transport Plans in support of out of centre leisure and commercial developments where appropriate.

DUNDEE AND ANGUS STRUCTURE PLAN

**CONSULTATIVE DRAFT
FEBRUARY 2001**

SUSTAINABILITY APPRAISAL

TRANSPORT AND TRAVEL

Policy, Proposal or Paragraph: Transport and Travel Policy 1
--

Summary of Comment

Add wording such as “ in the most sustainable way “, or state that the policy will support the objectives of the Local Transport Strategies including meeting targets for road traffic reduction and air quality. “

Assessment

It is considered that adding the words” in the most sustainable way “ will not strengthen the Policy as its meaning is unclear. There is no objection in principle however to the suggestion that reference be made to the Local Transport Strategies in Policy 1 to confirm that the Policy will be pursued in support of the objectives of these strategies. As the position on road traffic reduction and air quality is outlined in the Local Transport Strategies there is no need to make specific reference to targets in the Policy .

Recommendation

Amend Transport Policy 1 as follows :-

“In support of the objectives of the Local Transport Strategies , Dundee City and Angus Councils will”

Policy, Proposal or Paragraph: Transport and Travel Policy 2
--

Summary of Comment

Add bullet point relating to car restraint and traffic management including maximum parking standards for new developments.

Assessment

In seeking to advance a sustainable transport system Transport Policy 2 already states support for the Local Transport Strategies which address issues such as traffic constraint, parking policy and traffic management therefore there is no need to specify these measures in the Policy wording. It is acknowledged however that traffic management measures aimed at reducing traffic congestion and improving safety for cyclists and pedestrians have an important role in advancing a sustainable transport system and that such measures should be highlighted in the text as being complementary to the land use strategy of the Plan.

Recommendation

Insert the following text at the end of paragraph 6.14 :-

“The use of traffic measures designed to manage traffic and give priority to walkers , cyclists, public transport and those with restricted mobility will complement the land use strategy of the plan in advancing sustainable transport .Such measures including parking standards will be implemented through the Local Transport Strategies and Local Plans .”

Summary of Comment

The Policy should encourage the preparation of Transport Assessments for significant new development and the preparation of Green Travel Plans by major travel generators.

Assessment

The requirement for significant travel generating uses to produce Transport Impact Assessments and Green Travel Plans where necessary is addressed under Ref 21/1/17-Omission of Additional Paragraph dealing with Sustainable Transport. Whilst it is agreed that the requirement for such methods should be highlighted in the Plan it is considered that this would most appropriately be dealt with through an amendment to Transport Policy 3 and Para 6.22 which deal with the location of development and travel generating proposals rather than Transport Policy 2 as suggested.

Recommendation

No Change.

Summary of Comment

There is no mention of community safety. Insert the word “secure” in describing pedestrian, cycle and public transport facilities.

Assessment

In the light of other comments received under Ref 247/1/3 – Transport Policy 3 it is recommended that the first bullet point of Transport Policy 2 be deleted and Transport Policy 3 be reworded. It is considered therefore that the suggested rewording of Transport Policy 3 which includes as a bullet point “provide safe, convenient and attractive facilities for pedestrian, cycle and public transport access” addresses this issue.

Recommendation

No Change

Summary of Comment

Specify that the Plan supports measures which will improve accessibility to facilities and services for people with restricted mobility.

Assessment

Whilst access difficulties for rural dwellers and people without access to a car are highlighted in paragraphs 6.18 and 6.19 it is agreed that support for measures to improve accessibility for people with restricted mobility should also be made in Transport Policy 2. It is also considered that specific reference to people with mobility problems should be made in paragraph 6.18 which would highlight the important role of public transport in providing access not only for those without a car but a range of other people with restricted mobility such as the elderly, disabled, rural dwellers etc. In addition whilst public transport is discussed in para 6.18 it should also be supported in the policy wording as public transport plays a key part in promoting a sustainable transport system. It is considered therefore that a new bullet point relating to public transport be inserted in Transport Policy 2.

Recommendation

Insert two new bullet points in Transport Policy 2 as follows:-

- “*improve accessibility to facilities and services for people with restricted mobility*”
- “*maintain and improve facilities for public transport*”;

Amend paragraph 6.18 as follows:-

“.....providing access for those *with mobility problems including those without the use of a car*.....”

Summary of Comment

- (a) Clarify “sequential” to indicate that sites which would generate the least traffic and the least environmental damage from travel will in general be favoured for development.
- (b) The Policy should encourage the use of Transport Accessibility profiles (by Council) and Transport Assessment (by Developers) as tools for assessing potential development locations.

Assessment

(a) & (b) Similar comments on these issues have been made by other parties and are considered under Ref 247/1/3 above and 21/1/17 – Omission of Additional Paragraph Dealing With Sustainable Transport.

Recommendation

No Change

Summary of Comment

The Policy should refer to development guidance set out in the Local Transport strategy and associated Road Traffic Reduction Act Report.

Assessment

While the role of the Local Transport Strategies in reducing the need to travel is highlighted in Paragraph 6.21, it is agreed that reference to the Local Transport Strategy should also be made in the wording of Transport Policy 3 to emphasise the linkages between the Local Transport Strategy and Local Plan in providing a framework for the integration of transport and land use. However, given that the Road Traffic Reduction Act Report is included in the Local Transport Strategy, there is no need to make specific reference to this Report in the Policy wording.

Recommendation

Insert the words “ having regard to the objectives of the Local Transport Strategy” in Transport Policy 3.

DUNDEE AND ANGUS STRUCTURE PLAN

**CONSULTATIVE DRAFT
FEBRUARY 2001**

**SUSTAINABILITY APPRAISAL
ENVIRONMENTAL RESOURCES**

Policy, Proposal or Paragraph:	Environmental Resources Policy	1
---------------------------------------	---------------------------------------	----------

Summary of Comment

Mention mitigation measures for proposals that are accepted as being appropriate within locally important sites.

Assessment

It is generally accepted that, in response to this and other comments, Policies 1 and 2 need redrafted to reflect the provisions of NPPG14: Natural Heritage. Environmental Resources Policy 2 will be redrafted to emphasise that all development proposals will be required to minimise their impacts on the wider natural heritage.

Recommendation

No change. Note redrafted Environmental Resources Policy 2. (See ref 149/1/6, page 295)

Summary of Comment

Strengthen wording to indicate 'a presumption against inappropriate development' and to require Local Plans to follow the provisions of the LBAPs.

Assessment

It is generally accepted that, in response to this and other comments, Policies 1 and 2 need redrafted to reflect the provisions of NPPG14: Natural Heritage Policy 1 requires to be redrafted to include a general presumption against inappropriate development within international, national, regional and local designations. A redrafted Environmental Resources Policy 2 dealing with the wider natural heritage will emphasise the need for Local Plans to respect the provisions of the Local Biodiversity Actions Plans for Tayside and the Cairngorms area.

Recommendation

Replace Environmental Resources Policy 1 and Policy 2 (see ref 149/1/6, page 297)

Summary of Comment

Expand the policy to indicate what 'appropriate/inappropriate' means in relation to the hierarchy of importance. This might use a strengthened version of the hierarchy set out in the accompanying text.

Assessment

Policy 1 requires to be redrafted to reflect the provisions of NPPG14: Natural Heritage, particularly to strengthen the level of protection afforded to international, national, regional and local designations.

Recommendation

Replace Environmental Resources Policy 1 (see ref 149/1/6, page 295)

Policy, Proposal or Paragraph:	Environmental Resources Policy	2
---------------------------------------	---------------------------------------	----------

Summary of Comment

Policy 2 should ask Local Plans to incorporate the management proposals for each landscape type, as set out in the Tayside Landscape Character Assessment (TLCA).

Assessment

Whilst the Councils accept that Policy 2 should be strengthened in respect of safeguarding and enhancing the wider nature heritage, a statement requiring Local Plans to incorporate management proposals for each landscape type set out in the TLCA would be inappropriate. Under the provisions of redrafted Policy 2, the TLCA will constitute a material consideration in determining proposals and in providing for new development within Local Plans. This will provide a level of detail sufficient for the Structure Plan.

Recommendation

No change. Note redrafted Environmental Resources Policy 2 (See ref 149/1/6, page 295).

Summary of Comment

The Plan should specify that new development should be consistent with local landscape character. It should also refer explicitly to the protection of regionally important and designated landscapes.

Assessment

Under the provisions of redrafted Environmental Resources Policy 2, the Tayside Landscape Character Assessment will constitute a material consideration in determining development proposals and in providing for new development within Local Plans. Similarly, it will require that all development respects the main features and characteristics of the natural heritage, and contributes to landscape restoration or improvement.

Policy 1 will be redrafted so that it relates to all natural heritage designations, as opposed to nature conservation designations.

Recommendation

Replace Environmental Resources Policies 1 and 2 (see ref 149/1/6, page 295).

Policy, Proposal or Paragraph:	Environmental Resources Policy	3
---------------------------------------	---------------------------------------	----------

Summary of Comment

Add wording to ensure coastal developments are consistent with shoreline management plans, and that the character of the developed coast is not adversely affected by the cumulative impact of development.

Assessment

Agreed that reference to Shoreline and Coastal Zone Management Plans should be incorporated into Policy 3 and supporting text.

Recommendation

Amend supporting text to Policy 3 by adding the following to the end of para 7.16:-

“ In support of this Angus Council is currently preparing a Shoreline Management Plan for the coastal stretch extending from Milton Ness (north of Montrose) to Dundee.”

Amend Policy 3 by adding “ in support of the emerging Shoreline and Coastal Zone Management Plans.” to the end of paragraph 1.

Summary of Comment

Suggest that Local Plans should allow enhancement of public access to the coast, subject to shoreline management plans for the relevant section of coast.

Assessment

Enhancement of access to the coast is sufficiently addressed in Environmental Resources Policy 5.

Recommendation

No change. Note amended supporting text and Environmental Resources Policy 5.

Policy, Proposal or Paragraph:	Environmental Resources Policy	4
---------------------------------------	---------------------------------------	----------

Summary of Comment

Specify that any flood protection measures should be consistent with other policies protecting the natural and historic environment, and landscape or urban character.

Assessment

Agreed that these points should be reflected in a redrafted Environmental Resources Policy 4.

Recommendation

Replace supporting text and Environmental Resources Policy 4 (see ref 149/1/23, page 319).

Policy, Proposal or Paragraph:	Environmental Resources Policy	5
---------------------------------------	---------------------------------------	----------

Summary of Comment

Add wording to specify that urban fringe improvements should aim to promote sustainability and regeneration.

Assessment

Agreed that additional wording could highlight the linkages with sustainability objectives.

Recommendation

Amend Policy 5 by adding “, which support on-going regeneration and sustainability.” at the end of the sentence.

Policy, Proposal or Paragraph:	Environmental Resources Policy	6
---------------------------------------	---------------------------------------	----------

Summary of Comment

Reword policy to include the promotion of sustainability as a criterion for supporting development proposals (e.g. 'Development proposals that assist urban renewal, community regeneration, promote sustainability, and assist the appropriate re-use of vacant and derelict land ...'. Also, 'environmental improvements that promote sustainability ...'.

The policy could spell out what is meant by sustainability in this context (e.g. conserving energy; reducing car trips; benefiting disadvantaged groups; using local labour; promoting community safety).

Assessment

Agreed that it would be appropriate to include reference to sustainability in Policy 6.

With reference to the second point sustainability is a key theme of the Structure Plan and the Guiding Principles within the Development Strategy Chapter provide sufficient direction without the need for further clarification within Policy 6 itself.

Recommendation

Amend Policy 6 by adding " to support on-going regeneration and sustainability." to the end of paragraph 3.

Summary of Comment

The policy could be strengthened by referring to the development of design guidelines for different context, including Conservation Areas.

Assessment

This is not seen as a strategic planning issue. Policy 6 provides sufficient direction for Local Plans in this context.

Recommendation

No change. Note changes to Environmental Resources Policy 6 (see ref 21/1/30, page 332)

Summary of Comment

Broaden policy to cover 'built heritage and archaeological resources'.

Assessment

The Councils recognise the need to revise the terminology used within this section of Chapter 7 to provide a clearer distinction between the built environment and features of historic interest, including archaeological resources.

Recommendation

Replace supporting text and Environmental Resources Policy 6 (see ref 21/1/18, page 297).

Policy, Proposal or Paragraph:

Environmental Resources Policy 7

Summary of Comment

The policy could refer to use of methodologies such as “Quality of Life Capital” to explore the full impact of specific development proposals involving agricultural land.

Assessment

The “Quality of Life Capital” methodology is generally unsupported in the context of development proposals affecting agricultural land. The range of national guidance is considered to give adequate weight to protection of this important national resource. In addition, where the nature and scale of any development proposal merits Environmental Assessment, issues relating to agricultural land will be considered.

Recommendation

No change.

Summary of Comment

The Plan could mention use of the Rural Stewardship Scheme as a mechanism for encouraging farming practices that protect or enhance soil quality, wildlife habitats, landscape character, public access and other aspects of sustainability.

Assessment

While the role of the Rural Stewardship scheme is recognised, there is generally no planning control over farming practices. It is inappropriate to include reference to these matters which are outwith the scope of the land use planning system.

Recommendation

No change.

Policy, Proposal or Paragraph:

Environmental Resources Policy 8

Summary of Comment

It will be appropriate to review the IFS Categories and policies during the life of the Structure Plan.

Assessment

Although it is agreed that the Tayside IFS may require updating in the context of SOED Circular 9/99 and the Scottish Forestry Strategy it remains a robust strategic framework for considering commercial forestry proposals. It is not intended to undertake a major review of the IFS at the present time.

Recommendation

Delete last sentence of para 7.25.

Add as new paragraph:- The Tayside Indicative Forestry Strategy (IFS) introduced as part of the Tayside Structure Plan 1993 provides a robust strategic framework for considering commercial forestry proposals. The IFS continues to be generally relevant in the context of the latest guidance, including SOED Circular 9/99. Although the IFS may require updating, it is not intended to undertake a major review at the present time. The Structure Plan will seek to actively encourage appropriate commercial forestry expansion, including the potential for clusters of forestry related businesses, based on the Tayside IFS and the complementary guidance provided by the Tayside Native Woodlands Initiative and the Cairngorms Forest and Woodland Framework.”

Summary of Comment

Specify that forestry proposals should be consistent with the recommendation of landscape character assessments, LBAP's, HAP's, SAP's and equivalent management plans for the historic environment.

Assessment

It is acknowledged that planting proposals should take account of the natural, built and historic environment. As the Forestry Commission routinely consult on planting proposals directly with local authorities, Scottish Natural Heritage, SERAD and Historic Scotland and other agencies as appropriate it is not considered necessary to specifically refer to the interests identified. The Forestry Commission are also partners on the Steering Group for preparation of the Local Biodiversity Action Plans for Tayside and the Cairngorms.

Recommendation

No change.

Summary of Comment

Either rename this Policy Commercial Forestry or make a cross reference to Policy ERP6.

Assessment

Agree it is appropriate to rename Environmental Resources Policy 8.

Recommendation

Rename Environmental Resources Policy 8: Forestry as “Environmental Resources Policy 8: Commercial Forestry.”

Policy, Proposal or Paragraph:

Environmental Resources Policy 9

Summary of Comment

Sustainability Appraisal Environmental Resources

Make explicit that “new mineral extraction will only be allowed if demand for minerals cannot be satisfied from recycled materials and from existing extraction activities.”

Assessment

Agreed

Recommendation

Amend Policy 9 by including the following statement in paragraph 1:-

“or that market requirements cannot be met from existing mineral workings or the use of recycled or secondary material.”

Summary of Comment

Add wording to give support for developments that allow recycling of mineral resources, including construction materials.

Assessment

Agreed.

Recommendation

Amend supporting text to Policy 9 by including into third paragraph:-

“Proposals that recycle material waste and use secondary minerals will be encouraged.”

Summary of Comment

Incorporate wording on environmental and community impacts into the main policy.

Assessment

Policy 9 includes a requirement for proposals for new or extended quarries to be accompanied by an Environmental Statement which will address the full range of issues relating to the natural, built and historic environment, including impact on local communities. It is therefore not considered necessary to incorporate the specific wording suggested.

Recommendation

No change.

Policy, Proposal or Paragraph:	Environmental Resources Policy 10
---------------------------------------	--

Summary of Comment

Sustainability Appraisal Environmental Resources

Mention protection of designated sites and compliance with the recommendations of relevant plans and designations such as LBAP's, HAP's, SAP's, LCA's and any relevant urban design guidelines.

Assessment

It is acknowledged that renewable energy proposals should take account of the natural, built and historic environment. There is a requirement to submit an Environmental Statement in support of large scale proposals or where development is likely to have significant effects on the environment which will be expected to address the full range of issues affecting the environment, including impact on local communities. It is therefore considered unnecessary to specifically refer to the interests identified.

Summary of Comment

Mention Quality of Life Capital as a tool for exploring the potential impact of renewable energy and/or incinerator proposals.

Assessment

Use of the "Quality of Life Capital" methodology is generally unsupported in this context. The policy includes a requirement that an Environmental Statement will be required for all large scale proposals or where development is likely to have significant effects on the environment.

Recommendation

No direct change as a result of these comments but note general rewording of Policy 10 and supporting text to reflect the revised guidance provided by NPPG6 (Revised 2000): Renewable Energy Developments.

Policy, Proposal or Paragraph:	Environmental Resources Policy 11
---------------------------------------	--

Summary of Comment

Make more explicit by referring to LBAP's, SAP's, HAP's, LAC's and specifying that key environmental assets include air quality, water quality and the global climate.

Assessment

Specific reference will be made to LBAP's in revised Policy 2 and need not be repeated here. There is a requirement for development proposals to be accompanied by an Environmental Statement which would address the full range of issues relating to the natural, historic and built environment. Agree that Policy 11 should include specific reference to avoiding air, noise, land, surface water and groundwater pollution.

Summary of Comment

Ensure that the Tayside Area Waste Plan states that assessment of proposals will be based on the waste hierarchy.

Assessment

It is agreed that the Structure Plan should be in accordance with the emerging Tayside Area Waste Plan which seeks to establish a local strategy for waste management with increased emphasis placed on waste minimisation, reduction and recycling.

Summary of Comment

Support energy generation where this is appropriate in the waste hierarchy.

Assessment

Energy from Waste (EfW) is already part of the waste management regime in Dundee and Angus.

Recommendation

Replace supporting text and Policy 11:-

"At present waste from Dundee and Angus is managed through a combination of recycling, Energy from Waste (EfW) and ultimately landfill. With the introduction of EC Directives, UK policy and legislation, a National Waste Strategy for Scotland and the development of the Tayside Area Waste Plan there is an increasing emphasis on an integrated approach to waste management. Reducing dependency on landfill and a move towards resource and materials management is central to sustainable methods of managing waste. Structure and Local Plans have an important role to play in the delivery of sustainable development and implementation of the National Waste Strategy and Tayside Area Waste Plan to ensure that protection is given to the natural, built and historic environment.

The Tayside Area Waste Plan (which is being prepared by a partnership involving the Scottish Environment Protection Agency; Dundee, Angus and Perth & Kinross Councils; and the waste industry) will establish a local strategy for waste management incorporating the Best Practicable Environmental Option (BPEO) for Tayside. Initially the plan will assess the current operational practice for municipal waste only (commercial and industrial waste streams will be addressed at a later stage) and outline a phased programme of measures to achieve the Landfill Directive diversion targets by 2020. While emphasis will be placed on waste minimisation, reduction and recycling, there will still be a requirement for a proportion of waste to go to landfill.

A recently completed Waste Landfill Audit (undertaken by Consultants for Angus Council - June 2001) in projecting a 25% reduction of municipal waste going to landfill over the period to 2010 found that while Angus has sufficient landfill capacity for non-inert waste until 2015, when conjoined with Dundee, additional capacity may be required by 2006. The identification of sites for waste management infrastructure including additional landfill sites should be undertaken in the context of Local Plans taking into account the strategy and policies of the Area Waste Plan including the BPEO for Tayside.

ENVIRONMENTAL RESOURCES POLICY 11 : WASTE MANAGEMENT

Sustainability Appraisal Environmental Resources

Dundee City and Angus Councils will actively pursue a policy of self-sufficiency for waste management within the Tayside Waste Plan Area. Development proposals for waste management facilities will only be supported where they are justified in terms of the following criteria:-

- accordance with the Development Strategy and BPEO as set out by the Tayside Area Waste Plan;
- accordance with the proximity principle;
- avoidance of air, noise, land, surface water and groundwater pollution;
- avoidance of areas of flood risk and potential sea level rise;
- minimise impact on the natural, historic and built environment;
- safeguard the amenity of surrounding areas;
- minimise effects of traffic movements on the road network.

Where appropriate, development proposals will require to be accompanied by Environmental Statement and Transport Assessment.

Local Plans will:

- establish a policy framework and location criteria to control and direct the development of waste management facilities to ensure protection of key environmental assets and the quality of life for residents; and
 - encourage, in conjunction with other waste management initiatives, development that supports waste reduction and recycling.”
-