

3 July 2015

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FAO - Pam Ewen



TAYplan Proposed Strategic Development Plan Comments by the Scottish Property Federation

Introduction

1. The Scottish Property Federation (SPF) is the voice for the property industry in Scotland and speaks for over 150 corporate members. We include among our members major institutional investors, developers, landlords of commercial and residential property, and professional property consultants and advisers.
2. The SPF broadly welcomes the Proposed Strategic Development Plan but has suggested some changes below. In addition we have some general remarks to outline our view of the vision for TAYPlan identified in this draft second SDP for the region and the scope of opportunity we anticipate for the area.
3. The TAYPlan SDPA is unique in Scotland in that it possesses not just one but two cities around which the plan is based. True, Dundee is considerably larger than Perth but nonetheless these are two distinctive urban centres around which to base the plan's major attributes. In addition the location of TAYPlan between the populated central belt with its major airport connections to the rest of the world and to the Highlands and north east of Scotland brings both opportunities and challenges.
4. The proposed SDP rightly highlights the quality of life as a keystone of the vitality and attractiveness of the region. We agree with this view and we believe that it will be an increasingly important factor as the region seeks to grow its base of economically active households and changes the proposition of its town centres, wider retail and leisure amenities.
5. Our members are actively working to promote the development of new homes and commercial buildings in the region. SPF members have pointed out to us that a key challenge for the region is to build on its existing strengths, particularly to develop the region as a destination to attract commercial and individual tourism; to retain the high quality graduates produced in the Dundee higher education institutions in particular; and to seize the opportunities for energy based services arising from the maritime renewables and leisure sectors. We make the following suggestions therefore:

- 5.1. Local development plans should explicitly support the development of build to rent developments, encouraging flexibility of affordable housing where possible and appropriate planning policies such as single aspect design where necessary. The intention should be that the PRS sector can add to the supply of existing tenures of housing, all of which need to be boosted if supply is to maintain pace with demand in the region.
- 5.2. Planning policies should seek to promote the enhancement of leisure, hotel and restaurant offers in particular, into the town centres. The change in consumer demand, particularly towards online retail but also towards convenience shopping, will mean that traditional retail development has changed and this poses many challenges for town centres.
- 5.3. Local development plans should highlight the provision of appropriate broadband infrastructure . keeping communities and local businesses supplied with modern technology developments is now frequently an essential component of quality of life, commercial demand and also community services. Therefore it needs to be planned for. The growth of such technology may also be an opportunity for the successful regeneration of some of the region's smaller urban centres such as Montrose and Arbroath as businesses may find they no longer have to be located in major city centres to deliver their services. Of course this point does not preclude the need to continue to make transport improvements which are badly needed throughout the region and are well documented in the SDP.
- 5.4. We support the continued investment in the strategic development areas of Dundee Waterfront and North West Perth . these areas have the potential to be major economic drivers for the wider region.

Part A of Policy 1

6. Location priorities identifies Principal Settlements and separates them into a tiered system with development allocated accordingly. Tier 2 settlements, which have the potential ~~to~~ make a major contribution to the regional economy+are only given a small share of any additional development that has not been allocated to the Tier 1 settlements.
7. Our members are concerned that this does not recognise the importance of these areas within the Strategic Development Plan area, with many of them making a significant contribution to the regional economy. They have the potential to support significant new development, especially where they are within close proximity to a Strategic Development Area identified in Policy 3: A First Choice for Investment. These areas should be given the opportunity to absorb a larger scale of the housing land requirements identified on Policy 4: Homes, in order to promote sustainable development by locating homes and areas of business close to each other.
8. Our members are therefore of the view that consideration should be given to the removal of the tiered approach in the Proposed TAYplan, with allocations made to settlements depending on market need and demand. Alternatively, the definition of the Tier 2

settlements should be amended to accommodate an appropriate share of the additional development based on the need and demand of a settlement.

Part B of Policy 1

9. Part B of Policy 1 identifies a sequential approach to the release of land for all principal settlements. Development on land within principal settlements, particularly brownfield land, is considered preferable to development elsewhere. As a result land for development is prioritised as follows:
 - i. Land within principal settlements; then
 - ii. Land on the edge of principal settlements; then
 - iii. The expansion of other settlements

10. Our members are concerned that too much emphasis is placed on the development of brownfield sites before any other development can take place. Not all development proposals are suitable for a brownfield location and in many cases, existing brownfield sites are either constrained, or unviable for development. The prioritisation of these sites does not provide a range of effective sites, with many long standing brownfield sites continuing to be the focus for development, when there is little chance of them becoming effective in the short to medium term. In turn, this constrains the supply of housing and employment land. If these long standing brownfield allocations continue to be constrained, they should be removed from the Plan and alternative sites allocated in their place.

11. The development of brownfield sites can come forward through local development plan policies and therefore more support, or, equal priority should be given to the development of sustainable greenfield sites adjacent to settlement boundaries, within Part B of Policy 1. This would ensure the land supply requirements are met, as well as providing a range of sites in line with the Scottish Planning Policy.

12. SPF would be pleased to discuss our views at the Council's convenience.

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