
Angus Local Development Plan: Main Issues Report Consultation Responses

Part 2

Committee Draft

January 2015

Chapter 8 Arbroath

Chapter 8 - General

Representation: 798/022

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Comments 1 - 5 below are relevant to all the allocations discussed in the settlement strategies:

1. Overall approach to settlement analysis:

Scottish Natural Heritage welcome the comprehensive and clear analysis in respect of most of the sites in the settlement strategies. In particular, the maps showing accessibility information (map A), natural and built heritage features (map B), effective housing land considered (map C) and the landscape and visual analysis for each settlement. The rationale for the preferred option is clearly justified. Scottish Natural Heritage have noticed a few omissions or incorrect legend in relation to map B and recommend these are rechecked.

Scottish Natural Heritage have also submitted a response to the SEA draft Environmental Report separately but welcome the links to the findings of the SEA for the settlement options in the MIR which provides a clear and transparent link with the assessment.

2. Habitats Regulations Appraisal:

Scottish Natural Heritage look forward to working with the Council in the New Year to progress the HRA for the LDP. The early commencement of the HRA process will help to identify any implications for European sites and inform the choice of preferred option to be included in the Proposed Plan. This will ensure the options considered are not likely to fail at the latter stages of the Plan due to adverse effects on any European site. Scottish Natural Heritage have identified some likely significant effect on European sites in relation to some specific settlements which Scottish Natural Heritage recommend are considered through the HRA of the Plan. Please note that there may also be other sites which require consideration as part of the HRA screening. For allocations that proceed into the Proposed Plan and are subject to mitigation through the HRA to ensure adverse effects on site integrity will be avoided, Scottish Natural Heritage recommend a general approach that a development brief for the preferred allocation will set out the specific measures required. We welcome the intent to include the codes of practice for developers for both the River Tay SAC and the River South Esk SAC as planning guidance (para 6.32).

3. Landscape and visual impacts:

Please note that the advice is provided on the basis of a desk review of preferred and alternative options based on the landscape and visual (L & V) information contained in the MIR. Scottish Natural Heritage welcome the provision of initial baseline landscape and visual information to inform the assessment of development sites in this settlements section. Unfortunately, Scottish Natural Heritage have not been able to source the original Angus Landscape Capacity Report (2003) referred to in the MIR and which underpins the landscape and visual analysis within it. It is therefore difficult to fully understand the Council's approach to the assessment of capacity, and in turn how this has informed the Preferred and Alternative Options as presented within the MIR. Scottish Natural Heritage have made comments on landscape and visual impacts for some of the preferred and alternative development land options in the settlements section of the MIR. Scottish Natural Heritage would be pleased to meet with Angus Council at post MIR stage to discuss specific development land options in relation to site capacity and mitigation measures. In the longer term, Scottish Natural Heritage recommend further capacity work on a settlement wide basis. Paragraph 78 of the SPP explains that 'the siting and design of new housing should take account of its setting, the surrounding landscape, topography, character, appearance, ecologies and the scope for using local materials. The aim should be to create places with a distinct character and identity...' It is within this context that landscape capacity studies for

settlement expansion and housing development are encouraged. Assessment of capacity as a tool for development planning has moved on considerably over the last decade, and Scottish Natural Heritage recommend that the initial Landscape and Visual (L & V) analysis in the MIR is refined to provide a more robust and consistent assessment of landscape capacity for settlements. This could take forward the baseline assessment and consider the sensitivities of the local landscape character and visual resource (to and from the settlement) to further development. Analysis of the existing settlement form/street pattern (and open space) and the settlement edge and landscape setting will identify constraints and opportunities across the whole settlement including the potential for and guidance on appropriate mitigation. Please see our suggestions on approaches to capacity work contained within SNH's "A Guide to commissioning a Landscape Capacity:" <http://www.snh.gov.uk/search-results/?q=A%20Guide%20to%20commissioning%20a%20Landscape%20capacity%20-site:www.snh.org.uk/pdfs/>

4. Greenfield sites and green networks:

Most of the allocations discussed are greenfield sites, and are sometimes of a significant scale in relation to the existing settlement. Consequently, Scottish Natural Heritage agree with the findings of the SEA which recorded negative impacts on soils for most sites proposed. We recognise the difficulties of avoidance of greenfield sites in Angus, and because of this we welcome the MIR's cognisance of green infrastructure and potential for enhancement identified through development of most of the preferred options. For example, the Arbroath summary table (Page 55) under the "community benefits section," refers to the potential to extend green networks and create new path links with existing core paths. If properly assessed and executed, these measures will help mitigate effects on development of greenfield land including habitat fragmentation. Scottish Natural Heritage have not commented individually in relation to site allocations on where green infrastructure should be located for new allocations, such as areas of new planting. Rather, Scottish Natural Heritage support the more strategic "whole town" approach to developing green networks around each settlement, as discussed in para 6.26 of the MIR. This will identify the best places to locate green infrastructure in relation to the proposed allocations to ensure it is in the most effective places. Scottish Natural Heritage recommend this is carried out before the Proposed Plan so the findings of this process are incorporated in the Proposed Plan and as developer requirements for the preferred allocation.

5. Woodlands – Ancient Woodland Inventory sites (AWI) and Scottish Semi natural Woodland Inventory (SSNWI):

Many of the land allocations in the MIR – either proposed sites or alternative options - include areas of woodland, trees and hedges. Woodland is listed in the Scottish Semi-natural Woodland Inventory (SSNWI), but some woodlands are recorded as Ancient Woodland Inventory (AWI) sites. The category 'Ancient' comprises woods recorded as being of semi-natural origin on either the 1750 Roy maps or the 1st Edition Ordnance Survey maps of 1860. SPP clarifies that "Ancient and semi-natural woodland is an important and irreplaceable resource that should be protected and enhanced" (para 146). For example, Arbroath Alternative option 1 site is bounded by an AWI site - Seaton Den (long-established of plantation origin). Where proposed allocations contain existing woodland or trees or abut woodland sites, these should be retained and enhanced, and links between existing woodlands and trees should be sought through development to provide habitat connectivity.

Scottish Natural Heritage are pleased to see the commitment in the MIR to improving this connectivity and providing new woodland through development. This mitigation and enhancement is particularly important in lowland Angus due to low biodiversity and poor habitat links; fragmentation of existing woodland and the small size of existing areas is a key concern. Scottish Natural Heritage also made this comment in their response to the Angus

Woodland and Forestry Framework (final draft – 2 August 2011), and recommended a strategic green network to help mitigate this. As such, Scottish Natural Heritage have not commented on where new woodland areas should be located for the allocation options in the settlement strategies as we recommend this is informed by a planned approach to green networks around settlements and new allocations as detailed in 4) above. This will ensure the benefits of new habitats are maximised by being located in the best places where possible. As above, we recommend this is carried out before the Proposed Plan.

Response:

Comments noted.

Recommendation:

No change to preferred option - detail to be considered in drafting Proposed Plan in conjunction with Scottish Natural Heritage.

Main Issue:

Question: 0

Answer:

Representation: 774/002

Organisation: Historic Scotland

Representee: Andrew Stevenson

Comment:

The setting of the category B listed Seaton House will need to be a consideration for the Council.

Representation: 774/003

Organisation: Historic Scotland

Representee: Andrew Stevenson

Comment:

The setting of the category B listed North Tarry House will need to be a consideration for the Council.

Response:

Comment noted.

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan.

Representation: 916/051

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Arbroath Alternative 1

Flood Risk:-

There were several incidences of flooding around Abroath in 2009 (including in the vicinity and downgradient of this site). Properties were recorded as having been flooded from surface water runoff from fields in this area.

FRA would be required, reviewing area when the boundary is finalised. Flood risk must not be increased elsewhere and all sources of flooding will need to be considered.

Representation: 916/050

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Arbroath Preferred:

Flood Risk:-

There were several incidences of flooding around Arbroath in 2009 (including in the vicinity and downstream of this site). Several of these incidences are related to small watercourses, surface water runoff from fields / pluvial issues from that storm.

FRA would be required, reviewing area when the boundary is finalised. Flood risk must not be increased elsewhere (particularly downstream within Arbroath). Small watercourses and river crossings would need to be accounted for. Noted in the MIR that large areas are unlikely to be at risk of fluvial flooding. All sources of flooding will need to be considered.

Water Environment:-

Opportunity for restoration of modified watercourse which contains 90 degree bend. This may have implications for flooding - Council need to take this into consideration in the context of Arbroath flood alleviation scheme. Note - SEPA have a policy which precludes culverting for land gain.

Representation: 901/006

Organisation: Scottish Water

Representee: Adele Gallagher

Comment:

The sentence "There are no known significant infrastructure constraints, although improvement to the drainage network may be required and this would be tested through a Drainage Impact Assessment." We would suggest that this should be re-written to state "There are no known significant infrastructure issues; a Drainage Impact Assessment will be required".

Representation: 916/020

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Flooding in October 1976 resulted in flooding upstream of Guthrie Port. In February 1977 there was widespread flooding throughout the general area. The flow in the Brothock Water was estimated to be equivalent to a 1 in 25 year event, or a flood with an annual probability of occurrence of 4%. Dens Road, Wardmill Road, Catherine Street, Hume Street, West John Street, Lindsay Street, East Grimsby, Brothock Bridge area, Burnside Drive, Marketgate and Ladybridge Street were amongst the areas flooded. A flood prevention scheme was constructed after this flood to prevent a recurrence of flooding from a similar sized event. It is important to note that this flood prevention scheme does not meet current 200 year return period standards and Angus Council have been considering options for enhancing the existing protection. In the meantime any redevelopment close to the Brothock Water may need to provide additional mitigation measures to meet current SPP flooding standards for new development providing that these would not increase the risk to existing properties.

It should also be noted that there is coastal flood risk along the sea frontage and a combined fluvial and tidal risk in the lower reaches of the Brothock Water.

In February 1994 there was flooding in the Ladybridge and Harbour areas following a weekend of continuous rain. This flood and a few isolated events have occurred following the completion of the flood prevention scheme.

Representation: 916/052

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Arbroath Alternative 2

Flood Risk:-

There were several incidences of flooding around Arbroath in 2009 (including in the vicinity and downstream of this site). Several of these incidences are related to small watercourses, surface water runoff from fields / pluvial issues from that storm.

FRA would be required, reviewing area when the boundary is finalised. Flood risk must not be increased elsewhere (particularlry downstream within Arbroath). Small watercourses and river crossings would need to be accounted for. All sources of flooding will need to be considered.

Water Environment:

All Arbroath options - Council need to consider surface water drainage SUDS design in the context of the Brothock flood alleviation scheme and we would recommend discussion with the Council flood prevention officer

Response:

Comment noted.

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan.

Representation: 757/017

Organisation: Meadowbank Inn and Silverwells Garden Centre

Agents: Emac Planning LLP

Comment:

Extension of Settlement Boundary to include Silverwells Garden Centre Nursery to the west of the Montrose Road

Through the preparation of the Draft Angus Local Plan 2003, Angus Council produced an 'Assessment of Possible Development Sites' and the land to the south of the nursery (Wardykes) was included within that analysis. It was considered that Wardykes had potential to accommodate significant housing development within a structured landscape context and would help meet the Structure Plan requirement for Arbroath.

The recent MIR analysis recognises and reaffirms this positive context. Submissions have been made separately that the merits of the site remain and indeed have been increased by the allocation and recent site start of residential development at Montrose Road, Angus Local Plan Review site 'A1'.

The nursery is located to the northeast corner of the above site and can form a natural and moderate extension to it. The nursery is currently planted with trees and the retention of the trees around the perimeter of the site will enable new development to be accommodated with an existing and mature landscape setting enclosing views of the site from the northern edge of the town.

The site can be accessed from the existing road network and is well related to the A92. The site is well related to schools and other facilities and cycle, pedestrian and bus routes can be linked into existing provision. The site is wholly in the control of one willing landowner and there are no known major infrastructure constraints.

It is suggested that the site should be included within the Proposed Local Development Plan as part of the residential land allocation for Arbroath.

Response:

The Preferred Option for development land in Arbroath is retained. There is no requirement for additional greenfield housing land. The Silverwells Garden Centre Nursery remains

unconnected from the Development Boundary for Arbroath and this submission includes land north and east of the nursery.

Recommendation:

No change.

Representation: 757/016

Organisation: Meadowbank Inn and Silverwells Garden Centre

Agents: Emac Planning LLP

Comment:

Extension of Settlement Boundary to include the Meadowbank Inn and Silverwells Garden Centre to the east of the Montrose Road

Meadowbank Inn and Silverwells Garden Centre are located immediately to the north of the existing settlement boundary of Arbroath. The settlement boundary was extended in the Angus Local Plan Review, 2009 to include site A1, immediately to the south, and this site is currently being developed. The existing properties, subject to this submission, physically connect with the existing settlement and form part of it.

The planning approval associated with site A1 provides for access to the new houses off Bearfaulds Road and the site subject to these submissions is well connected in access terms to Site A1 and the adjoining development to the south. In addition, as part of the planning approval and road construction consent associated with site A1, it is understood that the 40mph speed restriction site will be relocated to the north of the Garden Centre on the A92. The speed sign identifies that visitors are arriving at the entrance into the town and it is appropriate that these sites should now be included in the settlement boundary.

The site subject to these submissions, is entirely characterised by built development, with the exception of a small field to the north of the Meadowbank Inn, which has had the benefit of planning permission (Ref: 06/01571/FUL) for an extension to the Inn to provide for hotel accommodation.

This inclusion of the land, subject to this submission, within the settlement boundary would be entirely consistent with other similar sites which are already included within the Arbroath settlement boundary and with land included in other settlement boundaries within Angus.

The built and land use characteristics of the site, together with its location immediately the north of the existing settlement boundary support the inclusion of the subject land within the settlement boundary of Arbroath.

Response:

The area identified east of the A92 comprises the Meadowbank Inn, Garden Centre and two greenfield sites extending to approx 1.5ha in total – as per Plan 2 Appendix 3, Suggested Extension to Settlement Boundary.

Bearfauld Road forms a clear development boundary for Arbroath, containing the new residential development to the south. There are a number of other individual properties north of Bearfauld and a review of Development Boundaries will assess the need for changes.

Ref: 06/01571/FUL – this application to extend the hotel as shown in Appendix 3 is contained within the hotel park/grounds of the Indian Restaurant not the paddock to the north. This application was not implemented.

Recommendation:

No change to the Development Boundary.

Main Issue:

Question: 20

Answer: No answer

Representation: 786/016

Organisation: Guild Homes

Representee: Mark Guild

Representation: 798/020

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

The subject land is located approximately 2.0km to the west of Arbroath town centre and is currently identified within the Angus Local Plan Review 2009 as contributing towards the employment land supply and any reuse would be categorised as 'brownfield'.

The site extends to approximately 3.0ha and access is taken from the A92 Dundee Road, which also forms the southern boundary of the site. Dundee Road is of course the main western entrance into Arbroath and the site is therefore in a key 'gateway' position.

The site is bounded to the north by the natural landform of the raised beach beyond which lies the main Elliot Industrial Estate and this raised landform provides valuable shelter for the site from the northern elements. The Elliot Industrial Estate is accessed separately from the Westway (A933) and there is no vehicular access between the two sites.

To the east of the site is the 'Westway/Dundee Road Retail Park', again accessed from the Westway (A933). The retail park includes uses such as ASDA, McDonalds, KFC and Halfords. The western boundary of the site is characterised by the access road leading from the A92 Dundee Road and the neighbouring Elliot Residential Caravan Park. The site is therefore located within an area of mixed use and could indeed be an extension of the retail park, albeit with its own independent vehicular access.

Planning Context:

The site is currently identified within the Angus Local Plan Review 2009 as 'Employment Land supply – Policy SC16'.

The purpose of this policy is to ensure a 5-year employment land supply, i.e. within Arbroath there is a requirement for a minimum of 10 ha, at all times. As such, Elliot and Kirkton Industrial Estates are identified as land areas that should be kept in such use to maintain employment opportunity and supply. It is material however that employment land allocation 'A11' which identifies the allocation of an additional 21ha of employment land directly to the west of the Elliot Industrial Estate has not yet been taken up/developed.

This would tend to suggest that through the emerging Local Development Plan, the opportunity should be taken to review employment land uses peripheral to the Elliot Industrial Estate which could be better deployed for other uses. In particular there is the opportunity for regeneration of this site, thereby improving the gateway entrance to the town and providing for a more attractive land use and building(s).

The current Local Plan identifies key issues for Arbroath such as how Arbroath can best take advantage of improved accessibility to Dundee and the trunk road network and how to develop opportunities that continue the physical regeneration of the town.

The review of this Local Plan development strategy must therefore, amongst other matters, encourage the ongoing redevelopment of underused brownfield sites within the built up area.

It is therefore important that Angus Council work in Partnership with interested parties to promote and develop opportunities which sustain the role and key functions of the town while safeguarding character, environment and historic value.

Site Proposals:

Within successive Local Plans, Angus Council have identified "Opportunity Sites" where it is recognised that there may be more than one use or a mix of uses appropriate for a site or area of land.

The frontage to the subject land and neighbouring uses on Dundee Road presents a mixed use area in a variety of ownerships and offers the opportunity for regeneration for one or more uses, including business, commercial, leisure and residential. Any development proposals would require to be accompanied by a Masterplan demonstrating the mix of uses and how the proposals will take account of the existing neighbouring activities.

Two relevant comparators can be found locally at Panmurefuiled Village, Broughty Ferry and Angus Gateway where a variety of uses abut each other and sit complimentary as a cluster of uses.

Presentation Products therefore request that the subject land is identified within the Proposed Angus Local Development as an Opportunity Site allocation and respectfully suggest the following wording.

Proposed new allocation within the Local Development Plan:

Land at Dundee Road, Arbroath:

3.0ha of land at Dundee Road, Arbroath provides an opportunity for a number of uses including Class 11 (Shops), Class 3 (Food and Drink), Class 7 (Hotel), Class 8 (Residential Institutions), Class 9 (Houses), Class 10 (Day Nursery), Class 11 (Assembly and Leisure), where they are compatible with surrounding activities.

Vehicular access will be from Dundee Road. A landscaping scheme incorporating new tree planting at this important entrance to Arbroath will be required as an integral part of the proposals for the site and should address both the frontage and the change in levels to the rear of the site.

Response:

The current site is a high profile business opportunity at the entrance to Arbroath with excellent access to the A92. At present there is no intention to extend the Elliot Industrial Estate although the allocation remains for long term security of supply. This site could provide access to the Elliot extension to the north west. There is currently 2.45ha land available at Elliot, primarily in small areas. Given the location, size and history of this site it should be retained for employment use.

Recommendation:

No change.

Main Issue:

Question: 21

Answer: Yes

Representation: 757/014

Organisation: Meadowbank Inn and Silverwells Garden Centre

Agents: Emac Planning LLP

Comment:

Given the uncertainty regarding the long-term future of RM Condor, the preferred option of considering opportunities for development and expansion of Arbroath elsewhere is welcomed. The amount of additional land required is quite small so the identification of a suitably scaled and deliverable site such as the nursery site can accommodate the TAYplan housing requirement and provide further flexibility in the supply.

Response:

The nursery site is approximately 2ha and cannot accommodate the TAYplan housing requirement as suggested. The identification of the Preferred Option provides flexibility of supply and an alternative location for greenfield housing in the south west rather than north east of the town.

Recommendation:

No change to Preferred Option.

Representation: 757/013**Main Issue:****Question:** 21**Answer:** No answer**Organisation:** Meadowbank Inn and Silverwells Garden Centre**Agents:** Emac Planning LLP**Comment:**

The MIR estimates that land for approximately 215 new homes are required across the housing market area and as Arbroath is the only town in this part of Angus, then additional land should be made available for this number of houses at Arbroath. A supply over and above this would provide for further flexibility and choice in accordance with SPP objectives.

Given the uncertainty regarding the long-term future of Condor, options for greenfield release have to be positively considered to demonstrate assurance of delivery of the 215 new homes over the LDP period, i.e. 2014-2024. Separate submissions on behalf of Mr C Hay have supported the preferred option to identify land to the north of Tarry Road for the 215 house requirement and reassess the position regarding Condor beyond this plan period. The nursery, within the ownership of Silverwells Garden Centre offers the opportunity for a northerly extension to this preferred option, immediately opposite existing built development, offering further choice in housing provision.

Response:

Tarry Road is not the Preferred Option. The Preferred Option provides flexibility of supply and an alternative location for greenfield housing in the south west rather than north east of the town. Should a supply over and above the identified numbers be required this can be accommodated within the Preferred Option as identified in the MIR.

Recommendation:

No change to Preferred Option.

strategic housing land requirement had been achieved elsewhere and, as there was no requirement for additional land allocation, the Reporter declined to recommend the subject land for residential use.

We remain of the opinion that the land has significant merit for an appropriate scale of residential allocation and would be grateful if the following could be taken into account in support of this position.

Through the preparation of the Draft Angus Local Plan 2003, Angus Council produced an 'Assessment of Possible Development Sites' and the subject land was included within that analysis.

It was considered that the site had potential to accommodate significant housing development within a structured landscape context and would help meet the Structure Plan requirement for Arbroath. Although it was recognised that the site was potentially visible from the north and the A92, structural planting would reduce the visual impact and enhance the existing urban edge. The recent MIR analysis recognises and reaffirms this positive context.

We would contend that the merits of the site remain and indeed have been increased by the allocation and recent site start of residential development at Montrose Road, Angus Local Plan Review site 'A1'.

Locationally, the south side of the site abuts Tarry Road, with existing housing beyond. The drive and grounds of North Tarry on the north and west boundary create both a screen to and backdrop for potential development. There is a tree nursery in the northeast corner of the site and appropriate planting on the northern boundary would effectively enclose the site and enhance this northern edge of the town.

The site can be accessed from the existing road network and is well related to the A92. There are no known major infrastructure constraints, although the disused electricity substation would require to be cleared. This is however a minor and easily achievable position. The site is well related to schools and other facilities and cycle, pedestrian and bus routes can be linked into existing provision. The site is wholly in the control of one willing landowner and there is significant developer interest in the site.

It is contended that the site should be included within the Proposed Local Development Plan as the residential land allocation for Arbroath.

Response:

The Preferred Option accords with TAYplan and identifies an area, not a site. The Proposed Plan will define a site with the capacity to accommodate the appropriate level of development. Condor's future has been addressed and is assumed to remain operational for the foreseeable future. Any land release in future LDPs will be considered in context at that time.

The Preferred Option provides flexibility of supply, an alternative location for greenfield housing in the south west rather than north east of the town and in close proximity to schools, retailing and employment and excellent access to the A92 and/or A933.

Recommendation:

No change to Preferred Option.

Main Issue:

Question: 22

Answer: No

Representation: 758/019

Representee: Mr & Mrs Lochart Porter

Agents: Burness Paull & Williamsons LLP

Comment:

The MIR recognises that East Seaton Farm has many advantages, in particular that the landscape has the capacity to absorb significant levels of new development with limited visual impact and that there is no areas of known flood risk. It is also acknowledged to be well located for access to schools, local facilities and connecting to local paths and green networks.

Claims that the local road network is severely constrained and would require significant upgrading at Seaton Road and Clifftown to deliver long term development are unsubstantiated. Links can be provided on to Seaton Road to the north and East Seaton Road to the south. A short connection from Seaton Road to the A92 is available via Bearfauld Road. Minor upgrading of this road will benefit allocated Site A and existing residents in the Clifftown area.

In addition, the assertion in the MIR (paragraph 27) that the site would be over-dominated by housing need not be the case if land was identified for mixed use development

Response:

No justification is given for not developing the Preferred Option which provides flexibility of supply, an alternative location for greenfield housing in the south west rather than north east of the town and in close proximity to schools, retailing and employment and excellent access to the A92 and/or A933.

The land required to Seaton Road to the North is not within the site as submitted. The Preferred Option supports existing retail and employment sites but mixed use at this scale – 35.8ha – has the potential to compete with not support existing retail and business sites.

Recommendation:

No change to Preferred Option.

Main Issue:

Question: 22

Answer: No

Representation: 757/015

Agents: Emac Planning LLP

Comment:

The preferred option for development at East Muirlands Road involves too large an area which neither conforms to the TAYplan strategic housing land requirement or allows the opportunity to accommodate the redevelopment of Condor as and when it becomes available. Whilst we have to assume that Condor will not become available during the ten-year period of this plan, the currently identified preferred option effectively conflicts with its likely availability in the ten years subsequent to this plan.

It is considered that 'Alternative Option 2' at Tarry Road (approximately 10 ha), together with a northerly extension to include the nursery (approximately 2 ha) provides an appropriate scale of development to accommodate the housing requirement of the area. The site is well located to access the A92, schools, the town centre and other facilities and drainage infrastructure is available. The nursery land has significant merit for an appropriate scale of residential allocation.

Response:

The Preferred Option accords with TAYplan and identifies an area, not a site. The Proposed Plan will define a site with the capacity to accommodate the appropriate level of development. Condor's future has been addressed and is assumed to remain operational for the foreseeable future. Any land release in future LDPs will be considered in context at that time.

The Preferred Option provides flexibility of supply, an alternative location for greenfield housing in the south west rather than north east of the town and in close proximity to schools, retailing and employment and excellent access to the A92 and/or A933.

The Preferred Option is retained means the nursery – and paddock to the north as identified in this submission - remains part of the open countryside.

Recommendation:

No change to Preferred Option.

Representation: 798/023

Main Issue:

Question: 22

Answer: Yes

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Comments on Arbroath preferred option:

Climate change, natural heritage and community benefits: summary table, page 55 - Scottish Natural Heritage welcome these for the preferred site.

Landscape and visual impacts: Scottish Natural Heritage recommend further analysis of these impacts for this site and further development of mitigation measures. The land rises up to B9127 - does this contribute to wider settlement setting and in turn will this influence the capacity of the southern part of site to accommodate change? SSSIs: Whiting Ness - Ethie Haven SSSI - There are unlikely to be any direct or indirect impacts to these sites from the preferred development option for Arbroath.

Comments on alternative options: Alternative option 1: This site is bounded by an Ancient Woodland Inventory site (AWI) - Seaton Den Long-Established (of plantation origin) and is also included in the Scottish Semi-natural Woodland Inventory (SSNWI) as semi natural broadleaved woodland. If this option is allocated, this should be protected and developer requirements should include appropriate new native planting to reinforce and mitigate any impacts. The site proposed on southwest sloping landform, which could contribute to the wider landscape setting, therefore landscape and visual impacts could be significant.

Alternative option 2: Developer requirements should include provision of new native planting to link with existing woodland, including new planting along the northern boundary and linking with existing woodland at the north west of the site. This site appears to conflict with Visual Envelope defined on Map D.

Response:

Support for the Preferred Option welcome, as is guidance on landscape and visual impact. Comments on Alternative Options noted.

Recommendation:

No change. This representation will be considered in preparing the Proposed Plan.

Chapter 9 Brechin

Chapter 9 - General

Representation: 916/021

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

There is a history of flooding in Brechin from the River South Esk. Angus Council has a number of flood studies available that have been carried out to support a submission for a flood prevention scheme. The largest flood in recent years occurred in 2002. This resulted in extensive flooding and temporary evacuation of some residents. It has been estimated that a 1 in 100 year event could result in over 150 dwellings and 10 businesses being affected.

It is not only properties adjacent to the River South Esk that are at risk of flooding. On 21st October a heavy rainfall event resulted in flooding of the Glencadam Distillery in Brechin.

Representation: 916/053

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Brechin Preferred - Several records of flooding in Brechin associated with the South Esk. Although other records on small watercourse do exist. No specific information relating directly to the site.

The authority should be aware that flooding may occur in other locations and not only on the South Esk. All sources of flooding should be considered at a planning application stage.

Response:

Comments noted. Potential impacts of flooding from the River South Esk will be addressed through a flood prevention scheme which is expected to be complete in 2016. The Proposed ALDP policy framework and land allocations will be informed by a Strategic Flood Risk Assessment as required by SPP which will ensure development does not take place in areas of flood risk or contribute to flooding elsewhere. Detailed policies based on the flood risk framework will be considered in drafting the Proposed Plan.

Recommendation:

No change. These representations will be considered in preparing the proposed Plan.

Representation: 901/007

Organisation: Scottish Water

Representee: Adele Gallagher

Comment:

Infrastructure requirements within table - Scottish Water is funded to provide upgrades at our water and waste water treatment works where the 5 growth criteria have been met and so limited capacity should not be seen as a barrier to development. Early conversations between Scottish Water and the developer are advised to allow maximum time for scheduling upgrades.

Response:

Comments noted.

Recommendation:

No change

Chapter 9 – Question 23 Are there any other main issues for the Brechin area that should be considered for the Angus LDP? Please explain your answer.

Main Issue: 0

Question: 23

Answer: No answer

Representation: 902/020

Organisation: City of Brechin & District Community Council

Representee: Mr Paul Wright

Comment:

The Angus LDP must reconsider a new road/bypass to the east of Brechin, the purpose being to provide a route for heavy lorries en route from the A90 to Montrose. At present the improvements the community would like in the town centre are not possible due to this traffic. It is also detrimental to the health and well being of the community and detrimental to the buildings. The present situation does not accord with the priorities of the LDP nor the vision of the TAYplan.

Brechin should have a cycle path connection to Montrose in the near future. This would encourage more use of cycles between Montrose and Brechin and link Brechin to the East Coast Cycle Route and thereby the national network.

Response:

The principle of developing a new Bypass to the east of Brechin to improve connectivity between Montrose to the A90 (T) has been considered in the recent past and discounted on economic and environmental grounds. Measures to improve safety and connectivity between Brechin and Montrose have been delivered through a series of road improvements along the A935 whilst improved accessibility in and around Montrose Port is being implemented in accordance with the South Montrose Draft Masterplan. However, further considerations are being given to the link between Montrose to the A90 (T) in the north of Angus, which may have an effect on traffic flows through Brechin. In addition, TACTRAN have compiled regional and local road freight maps illustrating recommended routes for hauliers which may assist in minimising HGV movement through the town centre.

The council encourages the use of alternative modes of transport and wishes to encourage cycling. Dedicated cycling links between our Burgh towns are currently limited to the A92 coastal link. The costs of such a provision is currently prohibitive in terms of the other demands on the council's capital budget and therefore unfortunately cannot be supported without external funding.

Recommendation:

No change. This representation will be considered in preparing the proposed Plan.

Main Issue:

Question: 23

Answer: No answer

Representation: 796/004

Organisation: Dalhousie Estates

Agents: Ristol Ltd

Comment:

Dalhousie Estates support the identification of a range of physical and infrastructure issues facing Brechin. It is submitted that the list contained in paragraph 7 should also include improved retail provision and a continued focus on employment led economic investment by providing opportunities for high quality business, leisure and tourism related projects linked to improvements to the town centre.

In advancing a land use strategy based on economic investment, it is submitted that a "Town Vision" is prepared for Brechin that is aligned to the TayPlan time frame of 20 years and reflects the Council's Single Outcome Agreement. Preparation of this vision should be collaborative and progressed in parallel with the preparation of the LDP. The aim should be

to enable development proposals to be informed by this long term vision on land use issues and opportunities for enhancing the quality of life within Brechin.

Response:

Comments noted. The formulation of town centre strategies developed in partnership with the local community is included as a Preferred Option in the MIR (see Table 17). These should identify and address challenges faced by town centres and provide a framework for coordinated action to improve them including developing a long term vision, identifying the potential for change and promoting opportunities for new development. The requirement to prepare town centre strategies will be included in the Proposed ALDP Action Programme. Future Local Development Plans will then reflect relevant outcomes from the town centre strategy in policies and proposals in order to sustain vibrant town centres.

Recommendation:

No Change. Timescale for the preparation of town centre strategies will be included in the Proposed ALDP Action Programme.

Submissions made on behalf of Dalhousie Estates as part of the Initial Awareness Exercise and subsequent meetings with the Council are referred to, in that they demonstrate the landscape, visual, transportation and infrastructure potential of land to the west of Brechin Business Park to accommodate future mixed use development.

Response:

Support noted. Further detail in relation to the development of Brechin west will be considered in preparing the Proposed Plan.

Recommendation:

No change. This representation will be considered in preparing the proposed Plan.

Main Issue:

Question: 24

Answer: No

Representation: 804/004

Representee: Mr John Ritchie

Agents: Archial Group

Comment:

The preferred option for the future development of Brechin is not supported. This option involves reliance upon existing housing allocations at Dubton Farm. An alternative option would introduce a new development site to the north of Brechin at Unthank, which could be used for a range of uses.

The site at Unthank, Brechin measures approximately 17 hectares and is currently used for agriculture. The site is suitable for a mixed use development, incorporating residential linked with ancillary local services including retail outlets and cultural facilities. The site is large enough to accommodate 100 dwellinghouses. It also offers scope to accommodate a relocation of Brechin High School, from its current location on Duke Street.

Response:

In line with the preferred option for housing land supply (Main Issue 1), the LDP will allocate land to meet the full housing land requirements for the North Angus Housing Market Area (HMA) set out in TAYplan. In so doing, the LDP is required to consider sites within settlement boundaries before sites on the edge of or outwith settlements and give priority to the reuse of previously developed buildings and land particularly listed buildings in line with TAYplan Policy 1. In this respect sites within settlement boundaries including the site at Brechin Road, Montrose, Dubton Farm, Brechin and a range of other sites have potential to deliver housing over the plan period. The preferred option to allow additional housing development on windfall sites will support a generous supply of housing and provide additional flexibility.

The proposed site is outwith the existing development boundary at Brechin. There is sufficient land available within the existing boundary at Brechin west to accommodate future housing and employment requirements for the plan period. A new community campus is being developed at Brechin High School which will provide new secondary school accommodation, community education and recreation facilities for community use. To allocate land outwith the development boundary as proposed when it is considered that sites within the boundary could be delivered would not be consistent with TAYplan Policy 1. In seeking to maintain an effective 7 year supply of housing the effectiveness of sites identified for housing will be monitored through the annual Housing land Audit and additional housing will be brought forward where necessary. An oversupply of greenfield land and would potentially undermine development of existing sites being progressed as well as brownfield regeneration objectives including Sunnyside Hospital.

(See also responses to comments on Local Development Plan spatial Strategy)

Recommendation:

No change.

The Church of Scotland General Trustees site, in conjunction with the land to the west and north which is being promoted by Scotia Homes, is a natural and logical extension to the recent housing development at Bearehill Brae which is being completed by A&J Stephen. The site falls within the current Development Boundary and is an established housing site, which is well located in terms of existing facilities and services.

The proposed allocation of The Church of Scotland General Trustees site in the new Local Development Plan would provide scope for a greater mix of new housing development in a suitable and accessible location.

It is therefore respectfully request that The Church of Scotland General Trustees site is allocated as a new housing development in the Proposed Plan when it is issued in 2013.

Response:

Support for the Preferred Option is noted. Further detail in relation to the development of Brechin west will be considered in drafting the Proposed Plan.

Recommendation:

No change. These representations will be considered in preparing the proposed Plan.

Main Issue:

Question: 25

Answer: Yes

Representation: 796/006

Organisation: Dalhousie Estates

Agents: Ristol Ltd

Comment:

The identification of land to the west of Brechin Business Park as the preferred option for future mixed use development is supported. This land is owned by Dalhousie Estates and as submitted in separate representations on questions 15, 23 & 24 of the Main Issues Report (MIR), technical submission made to the Council as part of the Initial Site Awareness Exercise and subsequent meetings with Officers have established that the land has no technical constraints preventing development from materialising and is being actively promoted by the landowner.

Site concept planning has established that the land has the potential to accommodate a range of uses that would facilitate the MIR's strategy of focusing on economic investment by providing opportunities for high quality business, leisure and tourism related projects linked to improvements to the town centre. In endorsing the identification of land to the west of Brechin Business Park as the preferred direction for future growth, Dalhousie Estates submit that the Proposed Plan should provide that actual uses for the land are informed by a Town Vision for Brechin and seek to positively address the land use issues and opportunities facing the town, in order to enhance the overall quality of life for the community.

Response:

Support for the Preferred Option is noted. The formulation of town centre strategies developed in partnership with the local community is included as a Preferred Option in the MIR (see Table 17). These should identify and address challenges faced by town centres and provide a framework for coordinated action to improve them including developing a long term vision, identifying the potential for change and promoting opportunities for new development. The requirement to prepare town centre strategies will be included in the Proposed ALDP Action Programme. Future Local Development Plans will then reflect relevant outcomes from the town centre strategy in policies and proposals in order to sustain vibrant town centres.

Recommendation:

No change. Timescale for the preparation of town centre strategies will be included in the Proposed ALDP Action Programme.

Chapter 10 Carnoustie

Chapter 10 - General

Representation: 916/055

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Carnoustie Alternative 1

Flood Risk:-

Record of flooding at Carnoustie High street downstream in 2009.

The extent of the site boundary is uncertain. The Lochty Burn is on the western boundary of the indicated area and the flood risk associated would need to be considered but a large area is likely to be available for development.

Representation: 916/022

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

There is a history of flooding in Carnoustie. There is an existing flood prevention scheme on the Barry Burn. The areas covered by the flood defences include, Buddon Drive, Harris Road, Macdonald Smith Drive, Ranensby Road, Thomas Street, James Street, Taymouth Street and Wattery Butts areas. The protection afforded to these areas was assessed by consultants working for the Scottish Executive in 2007. The Council's flood prevention staff should have access to the final report and flood maps from this exercise.

There has been isolated flooding in Carnoustie since the flood prevention scheme was completed. On 13 August 2008 there was a heavy rainfall event which resulted in reports of flooding in Macdonald Smith Drive, Ravensby Road, Thomas Street and James Street.

On 4 September 2009 there was flooding in Thomas Street and Ravensby Road with reports of flooded gardens. This flooding was again related to heavy rain and drainage issues rather than direct inundation from the nearby watercourse.

Low lying areas close to the coast may be at risk to tidal flooding.

Representation: 916/054

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Carnoustie Preferred

Flood risk:-

Record of flooding at Carnoustie High street downstream in 2009.

The extent of the site boundary is uncertain. The Lochty Burn is on the northern boundary of the indicated area, the flood risk associated with this watercourse has not been fully identified via the Indicative Flood Map as it is smaller than 3km² in this location. The flood risk associated with the Lochty Burn would need to be considered but a large area is likely to be available for development.

Water environment:-

Historical contamination of the Lochty Burn in the context of the bathing waters at Carnoustie – careful consideration of SUDS in respect of water quality and flood risk – see also flood risk comments.

Such a site exists on land West of McDonald Smith Drive, Carnoustie as shown on attached Plan 1.

Extending to just over 5.0 ha. the site was the subject of a 'bid' by D J Laing Homes during the preparation of the Main Issues Report (MIR). Currently underused farmland, as an infill site abutted on two sides by residential development, the site was assessed by Angus Council under site reference '3S' and considered not to accord with the objectives and locational priorities of the TAYplan, approved June 2012. Whilst the analysis acknowledges that the site is directly adjacent to the settlement boundary of Carnoustie, Angus Council noted that it is located in the undeveloped floodplain and the high water table makes development potentially contrary to TAYplan Policy Part 2, Part A. We would contend however that this is too simplistic a view and numerous sites which are identified as falling within the SEPA indicative 'at risk' floods areas, once analysed in greater detail, come forward for development with acceptable remedial measures.

Whilst we accept that the potential of flooding is a technical issue to be addressed, the SEPA flood map provides an overview of Scotland and does not provide enough detail to accurately estimate the flood risk associated with individual properties, sites or specific point locations. Local factors such as flood defence schemes or other local influences have not been included.

It is therefore material to the consideration of this site that D J Laing Homes are currently in liaison with Scottish Water and Angus Council regarding the impact of the Barry Burn and the likely solution involves attenuation up stream of the urban area. The detail will be subject to agreement with Angus Council and Scottish Water. In summary, D J Laing Limited remain confident that the finalised Drainage Impact Assessment will demonstrate an acceptable solution and ensure technical delivery of the site. There are not considered to be any other potential technical constraints.

Vehicular access is available from McDonald Smith Drive and this link also facilitates sustainable connectivity through pedestrian and cycle linkages back into Carnoustie. During construction a separate construction access will be taken from Station Road, thereby reducing any impact of construction traffic in the residential area.

It is envisaged that the site can potentially accommodate approximately 120 number of houses and flats, with a suitable mix of size and tenure. The attached indicative layout demonstrates the potential mix and layout of the site, predominantly flats and semi-detached housing, including strategic landscaping on this important western edge of the town. A market appraisal of the general location has shown that not only can this site deliver an appropriate percentage of 'Affordable' houses as required through Angus Council policy, but also a range and mix of private housing at the more affordable end of the market.

We would therefore contend that the site is suitable for allocation for 120 houses and flats and the settlement boundary of Carnoustie should be amended to accommodate this opportunity. An indicative layout is attached which demonstrates the potential type and scale of development.

Response:

Comments noted. This site (land to the west of MacDonald Smith Drive) was submitted during the Initial Awareness Raising Stage but was not considered as a preferred or alternative option for the future development of Carnoustie within the Main Issues Report (2012). Although this site is situated adjacent to the development boundary of Carnoustie, it is located in the undeveloped flood plain (as identified within Map B of the Main Issues Report

(2012)) and the high water table which makes development potentially contrary to Policy 2, Part A of TAYplan (2012).

Recommendation:

No change.

Representation: 860/001

Representee: Mr A Clark & Mrs Yule

Agents: McCrae & McCrae

Comment:

Six residential sites are submitted for consideration in and around Barry.

Response:

Comments noted. Six residential sites were submitted during the Initial Awareness Raising Stage, four of which were identified as part of Alternative Option 2 for Carnoustie within the Main Issues Report (2012). The remaining sites were not identified as forming part of Alternative Option 2 and are located in the undeveloped flood plain (as identified within Map B of the Main Issues Report (2012)) and the high water table which makes development potentially contrary to Policy 2, Part A of TAYplan (2012).

The Local Development Plan requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the ALDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. Proposed land allocations for residential development consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

Recommendation:

Comments noted. This representation will be considered in the preparation of the Proposed Plan.

Representation: 861/004

Representee: Mr A Gray

Agents: @rchitects

Comment:

After analysing Maps A to D and considering the historic development principles of the town and the landscape impact issues (including Map D), in line with the principles of master planning there would appear to be other significant areas primarily relating to landscape impact and the dipslope farmland that we feel should be considered to be prohibitive to development.

Response:

Comments noted. A Landscape Capacity Study of Carnoustie will be produced and will be taken into consideration in the selection of sites allocated by the Proposed ALDP. Policies in the Proposed ALDP will seek to safeguard and enhance the distinctive landscape character within Angus.

Recommendation:

Comments noted. These representations will be considered in preparing the Proposed Plan.

Representation: 861/002

Representee: Mr A Gray

Agents: @rchitects

Comment:

Agree with preferred option for this principle. To be a true master plan this however has to be irrespective and span ownerships and developers a like and deliver what is best for Carnoustie and the surrounding area, and we consider that the current preferred option with regard to development does not appear to do this.

Representation: 861/003**Representee:** Mr A Gray**Agents:** @rchitects**Comment:**

This should be based on what is best for Carnoustie and its surrounding area in relation to each use and purpose. A good master plan and the best option does not always mean the simplest/easiest in terms of one large blanket area for development.

Response:

Comments noted.

Recommendation:

Noted.

Representation: 853/004**Representee:** Peter Burke**Comment:**

Prior to the creation of a Town Centre strategy for Carnoustie, a detailed survey should be undertaken to establish what citizens and businesses want in the town. There are future capacity problems with primary schools and recycling facilities. If the area at Upper Victoria is to be identified as development land for business and industrial use, the current recycling facilities at Balmachie Road should be relocated to Upper Victoria. The Woodlands Caravan Park should be relocated to the optional Panbride development area, and Woodlands School extended across into these two sites. Any housing built on the Upper Victoria site should have path and cycleways connecting to the High School and hence the Woodlands school.

Representation: 853/005**Representee:** Peter Burke**Comment:**

This assumes that there will continue to be no Town Centre Strategy for Carnoustie, which runs counter to earlier proposals. If this option is to be taken up then it must be served by at least one bus route.

Response:

Comments noted. Significant consultation has been carried out with citizens and businesses across Angus as part of the initial awareness raising exercise and the Main Issues Report.

Consultation will be carried out with Angus Council's Education, Environmental Waste Management and Transport Officers in the preparation of the Proposed ALDP.

Angus Council will support the preparation of town centre strategies which will identify and address the challenges faced by town centres and provide a framework for coordinated action to improve them. Such strategies will be developed in partnership with the local community through the Community Planning Process. The formulation of town centre strategies will be included within the Action Programme for the Proposed ALDP.

Recommendation:

Comments noted. These representations will be considered in preparing the Proposed Plan.

Representation: 853/006

Representee: Peter Burke

Comment:

Any new housing development should have an allocation of land suitable and available for allotments.

Response:

Comments noted. Any requirements for particular uses additional to housing (e.g. play areas and community facilities) would be specified within Supplementary Guidance and development briefs or masterplans (please also refer to the responses for Question 10, Chapter 5).

Recommendation:

Comment noted. This representation will be taken into consideration in the preparation of the Proposed Plan, Supplementary Guidance, development briefs or masterplans identified within the Action Programme.

Representation: 844/023

Organisation: D J Laing

Agents: Emac Planning

Comment:

Land to the West of the former Barry Manse, Barry.

It is relevant in the preparation of the emerging Angus Local Development Plan that in addition to large strategic land allocations, there requires to be smaller and incrementally appropriate sites which can facilitate limited growth of a scale that fits with the current settlement pattern.

Such a site exists south of Dundee Road, Barry, shown on attached Plan 1.

Extending to 0.62 ha. the site has significant planning history and was the subject of a 'bid' by D J Laing Homes during the preparation of the Main Issues Report (MIR). Currently underused farmland, as an infill site abutted on three sides by residential development, the site was assessed by Angus Council under site reference '16S' and considered to accord with the objectives and locational priorities of the TAYplan, approved June 2012.

Whilst agreeing that this assessment was correct in its conclusion that the land is an appropriate housing site, we do not agree that the further land identified in Angus Councils Alternative Option 2 is a suitable and appropriate area for housing development as it is too large a scale of development for Barry.

In the consideration of any proposals for the subject land it is important to understand the history of allocations, consents and resolutions to grant consent in the immediate area.

Within the environs of Barry Manse, planning permission was granted in December 1998 for an extension to the hotel complex; thirty chalets (timber lodge construction with tile roof); two houses for workers within the chalet/hotel complex; and an animal farm, children's play area and tennis court and car parking for 60 cars. This consent (01/96/1280) was granted with an agreed and signed Section 75.

Material to the consideration of this proposed allocation, in response to this consent, the Finalised Local Plan 1999 zoned the site within the settlement boundary for holiday accommodation although this was deleted by amendment following representation from the then owner that such a use was not viable.

Subsequently, outline planning permission (01/00931/OUT) for the erection of 5 new houses and full planning permission (01/00932/FUL) and Listed Building Consent for the sub-division of the Old Manse to form 4 units (2 in the Manse and 2 in the Stable Block) received a resolution to grant planning permission in January 2002. The accepted principle was that the 5 new build houses were required to finance the restoration of the listed building which had, at that time, been damaged by fire.

It is notable that at the time of this application the site lay outwith the settlement boundary and was considered a windfall site.

Since this time, the implementation of the Barry by-pass is of course an important change in context and the site is now viewed from both the north and the south. A small and discreet housing proposal is therefore entirely in keeping with the linear form of the settlement and there will be no visual impact and it is our intention that along with the new house built to replace the fire damaged Manse, the proposals will provide a suitable scale and quality of housing befitting this important western gateway into Carnoustie.

D J Laing would therefore contend that the site is suitable for allocation for 7 houses and the settlement boundary of Barry should be amended to accommodate this opportunity. An indicative layout is attached as Plan 1 which demonstrates the potential type and scale of development.

Response:

Comments noted. Land to the west of the former Barry Manse, Barry was submitted during the Initial Awareness Raising Stage. This site formed Site Reference 16S and was identified as forming part of Alternative Option 2 for the future development of Carnoustie within the Main Issues Report (2012).

The Local Development Plan requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the ALDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. Proposed land allocations for residential development consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

Recommendation:

Comments noted. This representation will be considered in the preparation of the Proposed Plan.

Representation: 861/001

Representee: Mr A Gray

Agents: @rchitects

Comment:

The employment land previously allocated at Carlogie Road was presumably decided to be the best option after previous due consideration. While the previous developer proposing to develop this site has been unable to deliver this to date, the application has not been withdrawn or determined. The application, as indicated, is intended for approval (subject to a Section 75). Another developer is now proposing the same area for the same purpose, presumably as they consider this as a viable and profitable proposal even considering the current market. The previous developer is now proposing a new location within Carnoustie. There are no guarantees that this will be delivered either in the current market (as with any private development). We would therefore recommend that the original allocation remain as there is still significant interest by other parties in developing the site and the decision to locate employment land here in the first place has already been made previously presumably on the basis of what is best for Carnoustie and after the appropriate due consideration.

Response:

Comments noted. The planning history of the site in question (reasonable alternative 1) will be considered in preparing the Proposed Plan, as well as any update in the sites status.

Recommendation:

Comment noted. This representation will be considered in the preparation of the Proposed Plan.

Representation: 774/005

Organisation: Historic Scotland

Representee: Andrew Stevenson

Comment:

The setting of the category B listed Panbride House will need to be a consideration for the Council.

Representation: 774/004

Organisation: Historic Scotland

Representee: Andrew Stevenson

Comment:

Historic Scotland would have concerns about this proposed area of growth as it may impact on the site and setting of two scheduled monuments in the south of the area (Pitskelly, unenclosed settlement 200m S of (Index no. 6607) and Pitskelly, settlement 500m ESE of (Index no. 6608)). Historic Scotland welcome the identification of these issues in the report and agree that whilst development may be possible within the majority of the area, any allocations must contain a robust design strategy to avoid impacts on the monuments and their settings in accordance with national and local policy. Additionally, the future management of the monuments within the development area should also be addressed. Allocation of this area could be mitigated by design through avoidance of development in the southern part of the site. However, this may still require additional mitigation to protect the setting and physical integrity of the monuments.

Response:

Comments noted. Consultation will be carried out with Historic Scotland Officers, Angus Council's Archaeology Service and Angus Council's Conservation Officer in the preparation of the Proposed ALDP. Policies in the Proposed ALDP will safeguard protected sites, buildings and properties from inappropriate development whilst encouraging development which enhances the built and cultural heritage of Angus.

Recommendation:

Comment noted. These representations will be taken into consideration in the preparation of the Proposed Plan, Supplementary Guidance, development briefs or masterplans identified within the Action Programme.

Representation: 853/010

Representee: Peter Burke

Comment:

This would be an excellent place to put the relocated Woodlands Caravan Park. It is close to the sea, and has foot and cycle paths into Carnoustie and also along the Sustrans north coast route. It would be less intrusive than a 'proper' development for those viewing from Panbride itself, and with lighter (caravan) traffic there would be no need for a road improvement.

Representation: 853/009

Representee: Peter Burke

Comment:

Leaving aside the desire or not for a development here: 'The requirement to improve this road to increase road safety' (your quote) why has this not been addressed and when will it be? Business park or no business park, if the road is dangerous it needs modifying.

Response:

Comments noted. A Transport Appraisal will be undertaken in the preparation of the Proposed Local Development Plan and consultation will also be carried out with Angus Council's Road's Officers. Policies in the Proposed ALDP will reflect that in some areas the transport network will require improvement to roads infrastructure, public transport and path networks to support and enable future development. Where appropriate, site allocation policies and development briefs will specify where infrastructure requirements or improvements are known. The exact nature of improvements will be negotiated during the determination process of any future planning application.

Recommendation:

Comments noted. These representations will be considered in preparing the Proposed Plan.

Representation: 853/008

Representee: Peter Burke

Comment:

One community benefit would be to allocate land for allotments.

Response:

Comments noted. Any requirements for particular uses additional to housing (e.g. play areas and community facilities) would be specified within Supplementary Guidance such as development briefs or masterplans (please also refer to the responses for Question 10, Chapter 5).

Recommendation:

Comment noted. This representation will be taken into consideration in the preparation of the Proposed Local Development Plan, Supplementary Guidance, development briefs or masterplans identified within the Action Programme. Standards for the provision of open space in new development, which will be established through Angus Council's Open Space Audit and Strategy, will require to be produced and will be identified within the Action Programme.

Representation: 854/002

Representee: Ed Oswald

Comment:

Have the following general comments in relation to Carnoustie:

- Note the comments regarding the employment land at Carlogie Road where the council is trying to resolve a related planning application. Permission has not yet been granted because of the need to conclude a Section 75 legal agreement.
- Support the recommendation for a Scottish Water Drainage Impact Assessment for new developments.
- Note the limited primary school capacity particularly at Burnside and Woodlands. Carlogie has capacity for future development. Boundary lines for allocated school catchment areas could be changed to suit capacity.
- Support proposed future provision for community recycling facilities to serve Carnoustie & Monifieth and future provision of land for cemetery use and allocation of land for a sports ground with associated facilities.

- Would support an application for a decent sized supermarket with an adjacent petrol station in the town.
- The Kinloch Centre Action group is still working towards establishing a heritage/cultural centre for the town. It is hoped whether successful or otherwise that an area suitable for an open town square would be allocated for development.
- With a huge increase in commuters travelling to Dundee, urgent review of car parking facilities are required.

Response:

Comments and support noted. A Strategic Flood Risk Assessment will be undertaken to support the site selection process in the preparation of the Proposed ALDP. Where appropriate, Drainage Impact Assessments will be required to support development proposals. A policy approach to flooding and drainage including SuDS will be set out in the Proposed ALDP.

Consultation will be carried out with Angus Council's Education, Environmental Waste Management and Transport Officers in the preparation of the Proposed ALDP.

Angus Council will support the preparation of town centre strategies which will identify and address the challenges faced by town centres and provide a framework for coordinated action to improve them. Such strategies will be developed in partnership with the local community through the Community Planning Process. The formulation of town centre strategies will be included within the Action Programme for the Proposed ALDP.

Recommendation:

Comments noted. This representation will be considered in preparing the Proposed Plan.

Representation: 853/003

Representee: Peter Burke

Comment:

Regarding the waste land at the Maltings and the Dick precast sites, I understand there is a drainage issue which Scottish Water refuse to resolve. This must be resolved to allow brownfield site development for housing and avoid a growing environmental, health and visible hazard. This combined area would provide the majority of land required for the 940 houses which need to be built in Carnoustie.

Response:

Comments noted. A Strategic Flood Risk Assessment will be undertaken to support the site selection process in the preparation of the Proposed ALDP. Where appropriate, Drainage Impact Assessments will be required to support development proposals. A policy approach to flooding and drainage including SuDS will be set out in the Proposed ALDP.

The Local Development Plan requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the ALDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. Proposed land allocations for residential development consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

The Proposed ALDP will allocate land taking account of a range of issues including infrastructure, flood risk, drainage capacity, the sites availability for development and the sites ability to deliver housing within the plan period.

Recommendation:

Comments noted. This representation will be considered in preparing the Proposed Plan.

Representation: 853/002

Representee: Peter Burke

Comment:

But insufficiently. Trains stopping at Carnoustie going both north and south are infrequent and often impractical to use. Railways operators should be encouraged to offer more stopping trains to allow both the reduction of car journeys to Dundee and Aberdeen, and also to make it easier for visitors to use this mode of transport. And Gold Street station is a waste of space - trains didn't even stop there when the latest 2 Open Championships were held in Carnoustie.

Response:

Comments noted. Issues relating to the frequency of trains stopping at Carnoustie Train Station are not a matter than can be addressed by the Proposed ALDP. This falls under the remit of the Tayside and Central Scotland Transport Partnership (TACTRAN) and the specific railway operators concerned.

Recommendation:

Noted.

Representation: 853/007

Representee: Peter Burke

Comment:

The local community needs to be able to have its views known and considered. Such a masterplan must be agreed democratically as well as considering the views of profit-driven developers. What is the mechanism for doing so?

Response:

Comments noted. Significant consultation has been carried out with citizens and businesses across Angus as part of the initial awareness raising exercise and the Main Issues Report.

Any masterplanning approach would be pursued through the Local Development Plan or Development Management process, and would therefore be subject to specific community consultation. The mechanisms for doing so are guided by Scottish Planning Policy and Scottish Government Planning Advice Notes.

Recommendation:

Comments noted.

Chapter 10 – Question 26 Are there any other main issues for the Carnoustie area that should be considered by the Angus LDP? Please explain your answer.

Main Issue: Question: 26 Answer: No answer

Representation: 798/026

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Under paragraph 1, it would be useful to identify the designated sites in the vicinity of the town – the Firth of Tay and Eden Estuary SAC and SPA respectively, Barry Links SAC and SSSI and Easthaven SSSI - designated because of their important coastal habitats and species. Also mention the need to consider impacts of new development in relation to the sites' interests.

Response:

Comments noted. A Habitats Regulation Appraisal will be produced and will be taken into consideration in the preparation of the Proposed ALDP. The Habitats Regulation Appraisal will identify the designated sites and will consider the impacts which new development would have in relation to the site's interests.

Consultation will be carried out with Scottish Natural Heritage in the preparation of the Proposed ALDP. Policies in the Proposed ALDP will seek to protect and where possible enhance the natural environment and its biodiversity.

Furthermore, a Strategic Environmental Assessment will be undertaken which will identify the designated sites and will consider the impacts which new development would have in relation to the site's interests.

Recommendation:

Comments noted. This representation will be considered in preparing the Proposed Plan.

Main Issue: Question: 26 Answer: No answer

Representation: 867/008

Organisation: Taylor Wimpey

Agents: Montgomery Forgan Associates

Comment:

Taylor Wimpey consider that the principle of allocating land for the period 2014-2024 for housing purposes at Carnoustie is flawed.

Instead, development for this period ought to be directed towards Monifieth which, as part of the Dundee Core Area (a Tier 1 Settlement) must accommodate significant housing development before Carnoustie (a Tier 3 Settlement) unless there are sound reasons for not doing so. It is submitted that the reasons set out within the MIR explaining that only land at Carnoustie rather than Monifieth is preferred as the location of the only significantly sized housing allocation within the LDP are not at all robust.

Notwithstanding the flawed principle of directing development to Carnoustie within the plan period, the credibility of the preferred option as a major residential allocation which must be able to make a significant contribution to the housing completion rates being met is challenged. The preferred site is firstly in multiple ownership and secondly, developer interest/commitment is unknown. Both are significant challenges to overcome in delivering housing here.

In respect of the specific site characteristics of the preferred option, the following comments are submitted. Critique on the Preferred Major Development Site at Carnoustie Site

Description The site consists of a sequence of mainly arable fields stretching from the north-western edge of Carnoustie as far as the A92 Arbroath Road. Pitskelly Farm is located within the south western area of the land and consists of a main farmhouse, large shed and ancillary farm buildings, together with a small row of cottages. There are groups of trees around the farmhouse, and hedgerows defining some but not all of the field edges. Otherwise the area is an open landscape with a sense of being elevated above sea level but of an even topography.

Whilst located close to the edge of the settlement it is physically divorced from it by protected open space and belts of mature trees with virtually none of the site directly abutting the existing urban area. It is a walk of around 2km to the town centre from Pitskelly Farm and there are no community facilities within easy access of the site. The western boundary consists of one of the main access points to Carnoustie from Upper Victoria on the A92. The southern edge consists of Shanwell Road. The east and staggered arrangements of northern boundary are poorly defined and consist of field boundaries. Visibility Much of the site area is visible from the A92 although as part of the wider landscape. It is difficult to discern this site within the wider area as it has such few defining features. There is no intervisibility with Carnoustie. The edge of the settlement is defined by mature belts of trees, and the physical divide of a scarp slope with defines a change in landscape character area. Hence Carnoustie sits at a much lower level to the site. Capacity for Development Capacity is defined as being the interplay between topography and natural site features. Manmade structures and roads can be brought into consideration. The site has few natural or manmade features and “bleeds” into the surrounding landscape; most importantly in terms of defining capacity, it is relatively flat. The site therefore has poor capacity for development. Creating capacity through a planting infrastructure would be possible but would be at odds with the landscape character of the wider area and therefore difficult to successfully achieve.

This is not an obvious site selection for new development. It has poor landscape capacity, and is visibly completely divorced from the existing settlement but also with poor physical links. It is at a distance from all facilities where getting into a car would be the preferred option for most residents, most of the time. The site has an odd shape which adds to the sense of being a site with little sense of identity. Meeting key targets for success place-making of distinctive, safe and pleasant, easy to move around, welcoming, adaptable and resource efficient would be particularly hard to achieve and any cross benefits to Carnoustie in terms of regeneration are likely to be low. Residents will find it easier to get on the A92 into Dundee rather than use Carnoustie. The only way that this site could work would be to accept that it is not an extension to Carnoustie but a new village settlement on the edge; to be built along sustainable principles it would require to be of a scale to accommodate some shops, community facilities and a primary school. With visibility so high it would require careful design thought and a high level of bespoke design in order to create a sense of identity and protect the character of the A92 corridor at this point. This would require land assembly and proper JV establishment in order to achieve a scheme of integrity; this would take time, negotiation and serious investment in both infrastructure and design. Comparison with Grange Farm Grange Farm is a smaller land area but with well defined capacity stemming from defined urban edges, topography and roads. Mature trees lend the site some character. Whilst also at a distance from the town centre (just over 1.5 km) from the town centre it has sports and cafe/commercial facilities as well as existing frequent bus services close to the site. The primary school is well within recommended walking distance. It forms a natural extension to the existing urban area. It benefits greatly from being within the ownership of the promoter and with infrastructure in place from previous phases of development.

It therefore is a site that has capacity, and is immediately effective. The alternative options have the same fundamental issue of principle, with the site specific issues raised against each in turn with the MIR reflecting Taylor Wimpey’s own thoughts. In any event,

notwithstanding the clear site specific issues with the preferred or preferred alternative options, development of the scale envisaged within the MIR for South Angus within the LDP period 2014-2024 ought to be directed to Monifieth as part of a Tier 1 settlement and not to Carnoustie as a Tier 3 settlement. In summary, it is submitted that there is no strategic justification to support the allocation of land for residential development purposes of the scale envisaged by the Council in Carnoustie instead a suitable location at Monifieth. In site specific terms and in matters of deliverability, each site in Carnoustie is flawed and each does not compare favourably with land at The Grange.

Response:

The Proposed ALDP requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the Proposed ALDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. It is important to the implementation of the TAYplan strategy that Local Development Plans do not undermine the delivery of development within the Tier 1 Dundee City by promoting greenfield land release in areas around the Dundee Fringe which could prejudice delivery of the Dundee Western Gateway or undermine redevelopment of the significant supply of brownfield sites within Dundee. The restriction applies primarily to significant greenfield extensions/allocations in the area but does not preclude appropriate brownfield and windfall sites within existing development boundaries coming forward.

Proposed land allocations for residential development in the South Angus HMA consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

Recommendation:

Comments noted. This representation will be considered in preparing the Proposed Plan.

Response:

Comments noted.

Recommendation:

Noted.

Main Issue:**Question:** 27**Answer:** No**Representation:** 867/009**Organisation:** Taylor Wimpey**Agents:** Montgomery Forgan Associates**Comment:**

Please see response to Question 26.

Response:

Comments noted (please also refer to the responses within Chapter 10, Question 26).

Recommendation:

Noted.

Main Issue:**Question:** 27**Answer:** No**Representation:** 861/005**Representee:** Mr A Gray**Agents:** @rchitects**Comment:**

There appears to be no logic or reason to link the proposed land to the east with the proposals to the west. If the Council is looking at the master plan approach as indicated for both residential and commercial proposals and is looking at an allocation of approximately 100 Ha, the obvious, most suitable and preferred option based on analysis of all the issues should be a combination primarily including the areas to the East and North (Carlogie Road). This option will deliver far more sensitivity and integration into the existing town.

Along with the current preferred option this also has significant developer interest, provides a logical extension to the town and has the least negatives and is most compatible with all criteria. Commercial/retail land could be to the North in close proximity to the A92 (in line with the previous allocation). This option remains hidden and unintrusive to the surrounding areas and is easily accessible from the existing town.

The proposals to the east are ideally suited for residential extension and have far greater access options, links with the existing residential areas and the town itself than with the existing preferred proposals due to the issues covered previously.

This proposed area is already well served in terms of Cycle/Footpath links, Bus routes, Rail links, location of schools, road network etc and as part of the development proposal there are opportunities to enhance and improve on these further.

Links to the wider networks of cycle/footpaths are easily possible and these in turn have close links with the existing mixed mode transportation options (Bus Rail etc.) which can be further enhanced and cannot be achieved with the preferred option as discussed previously. This also enables this option to have very good potential to limit transportation related carbon emissions which again is not possible with the current preferred option.

As part of an appropriate master plan, green networks can easily be incorporated linking to the wider environment and increasing the biodiversity potential further.

There is far less landscape impact issue to be addressed and the undeveloped coast line can easily be carefully protected by incorporation of open space paths and landscape.

This will deliver a quality extension of the main community rather than a separate poorly linked development as the potential with the current preferred option.

This proposal will enhance the historic character by continuing the development principle of the town and retaining its lack of visibility from wider Angus. As well as aiding the regeneration of the town through close links and accessibility.

Close proximity to schools especially primary school with existing capacity. Good safe route to school options to both Primary and High Schools. Potential to retain existing school boundaries.

The proximity to the conservation area at Panbride should be considered as an opportunity in the design process as are such elements for the preferred option.

This option is contained within the natural constraints of the landscape which minimizes the impact of the town on the surrounding area and continues the historic predominant East West growth. This has previously become more extensive and unbalanced to the west and is now limited by the flood plain of Barry Burn. And this proposal would help to centralize the town centre.

Representation: 858/001

Organisation: Carnoustie Community Council

Representee: Ian D Simpson

Comment:

Carnoustie Community Council believe that a masterplanning approach would best serve a long-term vision for future growth in and around the town. With regard to issues for the future development of Carnoustie, consideration should be given to the following:

- a) The existing business land allocation at Carlogie should be retained for potential future development should economic circumstances change and the required road link becomes viable.
- b) Carnoustie Community Council support the need to review land use for new recycling facilities, cemetery use and land for sports ground and associated facilities.
- c) With the increase in commuters travelling by train, a review is required into the provision of increased car parking facilities adjacent to the railway station.
- d) Irrespective of the outcome of Carnoustie Centre Action Group's effort to develop the site of the former Kinloch Primary School, this land should be allocated for an appropriate future community resource.

Response:

The Proposed ALDP requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the Proposed ALDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. It is important to the implementation of the TAYplan strategy that Local Development Plans do not undermine the delivery of development within the Tier 1 Dundee City by promoting greenfield land release in areas around the Dundee Fringe which could prejudice delivery of the Dundee Western Gateway or undermine redevelopment of the significant supply of brownfield sites within Dundee. The restriction applies primarily to significant greenfield extensions/allocations in the area but does not preclude appropriate brownfield and windfall sites within existing development boundaries coming forward.

Proposed land allocations for residential development in the South Angus HMA consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

Consultation will be carried out with Angus Council's Education, Environmental Waste Management and Transport Officers in the preparation of the Proposed ALDP.

Recommendation:

Comment noted. This representation will be taken into consideration in the preparation of the Proposed Plan, Supplementary Guidance, development briefs or masterplans identified within the Action Programme.

Representation: 854/001

Main Issue:

Question: 27

Answer: Yes

Representee: Ed Oswald

Chapter 10 – Question 28 Do you agree with the preferred option for the development of land in and around Carnoustie? Please give reasons for your answer and (if appropriate) describe any alternative option that you would prefer.

Main Issue: Question: 28 Answer: Yes

Representation: 798/028

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Carnoustie preferred option:

Subject to the findings of the HRA:

Firth of Tay and Eden Estuary SPA - screen in for consideration of likely significant effect in relation to qualifying bird features. This is to consider feeding/resting areas by the birds.

Barry Links SAC, Barry Links SSSI, Firth of Tay and Eden Estuary SAC and Easthaven SSSI:

There are unlikely to be any direct or indirect impacts to these sites from the preferred development option.

Climate change, natural heritage, infrastructure and community benefits:

Summary table page 71 - Scottish Natural Heritage welcome these in relation to the natural heritage for the preferred site.

Landscape and visual impacts:

All 3 options for Carnoustie have potential to generate significant landscape and visual impacts. Scottish Natural Heritage recommend further analysis as significant constraints are possible; this work will help inform any revisions required for site allocations. Large scale development relative to existing settlement size is proposed for this preferred site. The location conflicts with Visual Envelope as defined on Map D. There is a pronounced 'step' in site landform around Ravensby/Pitskelly which could contribute to current settlement setting. Significant landscape and visual impacts arising, which could be difficult to mitigate.

Comments on alternative options: Alternative option 1:

Smaller scale site. Location conflicts with Visual Envelope as defined on Map D. Pronounced 'step' in site landform around Carlogie Farm which could contribute to current settlement setting. Significant landscape and visual impacts arising, which could be difficult to mitigate.

Alternative option 2: Scottish Natural Heritage agree with the statement in paragraph 32 that this is not preferred because of the extension along the undeveloped coast. This is a gently sloping site which would extend Carnoustie westwards along the coast, with the potential for significant landscape and visual impacts on potentially sensitive coastal resource.

Response:

Comments noted. A Habitats Regulation Appraisal will be produced and will be taken into consideration in the preparation of the Proposed ALDP. The Habitats Regulation Appraisal will identify the designated sites and will consider the impacts which new development would have in relation to the site's interests.

Furthermore, consultation will be carried out with Scottish Natural Heritage in the preparation of the Proposed ALDP. Policies in the Proposed ALDP will seek to protect and where possible enhance the natural environment and its biodiversity.

A Landscape Capacity Study of Carnoustie will be produced and will be taken into consideration in the selection of sites allocated by the Proposed ALDP. Policies in the

Organisation: The Clayholes Partnership

Agents: Graham + Sibbald

Comment:

The Clayholes Partnership do not agree with the preferred option of development close to the Upper Victoria link road, and suggest instead that Alternative Option 1 (a northward expansion of the town above Panbride Road) should be pursued along with an extension to the alternative option 1 site to the west. In other words, we support the development of MIR Site 2S (Carlogie Strategic Development Area) together with an extension to include MIR site 5S (Land and Clayholes).

The reasons for this position are set out below:

1) Contribution to the Vitality and Viability of Carnoustie Town Centre

Walking distances to town centres should be a key consideration in the allocation of land for development. MIR Question 10, and the preferred option noted in Table 7, recognise the merits in linking residential development to local facilities. Whilst there is clear merit in incorporating a mix of land uses in major new developments, the same principles of accessibility and creating vibrancy apply to the allocation of new development sites and their potential impact on existing centres. Site 2S in conjunction with site 5S has the ability to contribute to the vitality and viability of Carnoustie Town centre by delivering homes within comfortable walking distance from the existing town centre. The preferred option at the Upper Victoria Link Road is remote from the Town Centre and does not create these opportunities.

2) Incentive for Provision of Road Line

Whilst the Barry bypass and Upper Victoria link road have been constructed, the proposed new road line at Carlogie Road has not yet been implemented. Development around the proposed Carlogie road line would create an incentive to undertake this road improvement, and potentially create opportunities to seek developer contributions to provide the link. Provision of this road line would be of wider benefit in improving the accessibility of Panbride and the eastern area of Carnoustie. Development of land close to the Upper Victoria Link Road would not create this incentive.

3) Primary School Capacity

The Primary School which would serve MIR sites 2S and 5S (Carlogie) still has capacity, whilst Burnside and Woodlands Primary Schools do not (i.e. the Primary Schools which would serve land close to the Upper Victoria Link Road). The MIR suggested approach of realigning school catchment areas in the event of allocation land close to the Upper Victoria Link Road is considered likely to be controversial; development closer to Carlogie School – and leaving existing catchment boundaries unchanged – is considered preferable.

4) Resolution of Access Issue to and from A92 for Clayholes (MIR site 5S)

The only reason identified in the MIR site assessment for discounting Site 5S: Land at Clayholes from the list of preferred or reasonable alternative sites is, "because of access difficulties to/from the A92". No other constraints are listed in the site assessment. The suggested combination of Sites 2S (identified as preferred Alternative Option 1), with land at Clayholes, resolves this issue for MIR site 5S by providing a physical link from the proposed new road line at Carlogie Road, linking sites 5S and 2S. The proposed new Carlogie road line would link Clayholes to the grade separated junction to the north, providing full access to and from the A92 in both directions. The new road line at Carlogie Road may lend itself to Development Charges – a potential funding option identified in the MIR.

Finally, The Clayholes Partnership question the rationale for identifying land close to the Upper Victoria Link Road as the preferred development area. The introductory text in the section about preferred sites (page 69 paragraph 17, states: "An expansion of the town beyond its current boundaries is therefore required, although any option must also focus on regeneration within the town itself" [emphasis added]. This comment appears to sit at odds with paragraph 22 (page 70) which states:

"...although town centre services and facilities are not very close-by, there is potential to develop new retail facilities such as a supermarket close to the existing built-up area. In terms of planning policy, new retail facilities should be as close as possible to the town centre, although it is recognised that there are limited development opportunities within the town centre that would be large enough and would be accessible by a range of transport modes".

The inference from these comments appears to be recognition that the preferred site does not offer opportunity to focus regeneration within the town itself – contrary to a key tenet of site selection as stated at paragraph 17. Instead, the clear suggestion is that a supermarket may be developed within this site. There is a risk that this preferred site, which is remote from the town centre, could become effectively a new mini-settlement, serviced by a supermarket and with few functional links to Carnoustie.

The Clayholes Partnership have presented a number of reasons why Site 5S, extended to include site 2S (i.e. Alternative Option 1 plus an extension to the west) represents a deliverable, attractive and defensible land allocation.

The Clayholes Partnership have further demonstrated a number of reasons why this combination of sites represents a better solution than the Council's current preferred option.

For the avoidance of doubt The Clayholes Partnership is happy to proceed on the basis that any development would require to be masterplanned, and would be willing to work with other landowners to establish a long-term vision.

Response:

Comments noted. Two development sites were submitted during the Initial Awareness Raising Stage. One of the sites, Site Reference 2S, was identified as part of Alternative Option 1 for the future development of Carnoustie within the Main Issues Report (2012).

The second site (Reference 5S) was not identified as part of any option for the future development of Carnoustie within the Main Issues Report (2012). This did not form part of any of the options for the future development of Carnoustie due to the access difficulties to/from the A92.

The Proposed ALDP requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the Proposed ALDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. It is important to the implementation of the TAYplan strategy that Local Development Plans do not undermine the delivery of development within the Tier 1 Dundee City by promoting greenfield land release in areas around the Dundee Fringe which could prejudice delivery of the Dundee Western Gateway or undermine redevelopment of the significant supply of brownfield sites within Dundee. The restriction applies primarily to significant greenfield extensions/allocations in the area but does not preclude appropriate brownfield and windfall sites within existing development boundaries coming forward.

Proposed land allocations for residential development in the South Angus HMA consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

Consultation will be carried out with Angus Council's Education, Environmental Waste Management and Transport Officers in the preparation of the Proposed ALDP.

taken by Angus Council to the expansion of Carnoustie to facilitate the provision of new homes, employment opportunities and commercial and community facilities in a suitable and sustainable location that has the environmental and visual capacity to accommodate development. We believe this can be achieved by reinforcing the existing settlement pattern of Carnoustie in a sustainable way through the allocation of an appropriate mixed-use development at Carlogie.

The Main Issues Report recognises the merits that a northeastward expansion of the Town at Carlogie can bring. The area includes the existing Local Plan employment land allocation at Carlogie Road and the overall site has the environmental capacity to be developed for a mix of uses to provide new homes and business premises in addition to new retail development, a petrol filling station and open space. In short, the MIR analysis recognises that the subject land, as identified on the attached plan, has potential to accommodate significant mixed-use development within a structured landscape context. The land is in single ownership and is well located to the A92, schools, the town centre and other community and open space facilities.

Although, at this stage, the MIR identifies Upper Pitskelly as the preferred option for future development, it is notable that it also identifies a number of factors that would set Carlogie ahead of Upper Pitskelly in terms of overall planning merit. For example, Upper Pitskelly is recognised as having landscape issues, i.e. would need significant screen planting, is actually too large for the Tayplan housing requirement and is in various ownerships that make land assembly difficult. Significantly, the report also highlights that Carlogie has less landscape impact, is in single ownership, has better technical deliverability and has sufficient primary school catchment capacity.

Carlogie is also recognised as being closer to the town centre than Upper Pitskelly. Indeed, the only issue listed against Carlogie's allocation seems to be the perceived doubt over delivery of the new Carlogie Link Road. It remains material however that the Business Park site still has an outstanding resolution to grant planning permission with the travelling draft Section 75 submitted to Angus Council in April 2012 and it is our understanding that agreement and registration of the Section 75 is imminent. A firm commitment therefore remains to the delivery of the Carlogie Link Road.

Angus Estates Limited also consider it material that the Business Park site was under the control of a local developer until late 2011 and it was that developer's decision as to how and when development proceeded or not. Since the expiry of that option, Angus Estates have moved the site forward through the preparation and submission of the Section 75 and ongoing engagement through the emerging LDP. There also remains significant developer interest in all promoted land uses and therefore strong assurance of marketability and delivery should appropriate consents be forthcoming.

As part of our ongoing promotion of the subject lands for allocation, an initial landscape assessment and indicative masterplanning exercise has been undertaken. The Indicative Masterplan is included in Appendix 1 and seeks to set a preliminary context for a multi-use development which is distinctive and welcoming as a Gateway into Carnoustie and creates a sustainable development both in the immediate and longer term in line with the Scottish Government's policy approach in 'Designing Streets' and 'Designing Places'. The initial ideas included within the Masterplan will be tested and further evolved through ongoing liaison with Angus Council, statutory bodies and the local community to establish the preferred landscape treatment, land uses and development envelopes.

In summary, Angus Estates Limited submit that the subject land should be identified as the preferred option for development within the Proposed Angus Local Development Plan and allocated for a mixed-use proposal, the detail of which will be agreed over the coming months.

Representation: 851/003

Organisation: Muir Group

Agents: James Lothead Consultancy

Comment:

The Muir Group believe that an option based on land owned by the Company at Carlogie represents the best option for the future growth of the town as outlined in this submission.

This submission builds upon the submission by Iain Gotts Associates on behalf of the Muir Group made at the 'Awareness Raising Stage' dated 22 December 2010. It is unfortunate that this submission was not assessed by the Council in preparing the Main Issues Report (MIR).

The adopted Local Plan allocates some 15ha of land for employment uses at Carlogie to provide opportunities for existing and incoming businesses to locate. Although this allocation has not progressed in the current economic climate, it is considered that it reinforces that the Carlogie location opposite the employment site and surrounding the Carlogie House Hotel is appropriate for development for a range of housing led uses. In particular, and specifically recognised in the MIR, the landscape setting of this area is such that the site is well contained with the ability to absorb further development. The proposed site benefits from mature woodland to the north and east and the established development and landscaping around Carlogie Farm Road. The site is visually very contained yet in close proximity to Carnoustie. Furthermore, the proposal seeks to build upon the established development that already exists in the immediate vicinity.

The recent economic downturn has brought into sharp focus the need to allocate effective development sites. This is acknowledged in the MIR. The land proposed in this submission is in the ownership of the Muir Group and meets all the tests set out in PAN 2/2010 regarding the effectiveness of housing sites. Therefore, there are no impediments to the delivery of a housing led development on the Carlogie site. In addition, with increased emphasis on the need to maximise the prospects of housing in a difficult market, land owned by an active house builder demands particular consideration. The Muir Group agrees with the statements contained in the MIR that any proposals for Carnoustie require to take a long term view to its future development. The Muir Group are in a unique position to deliver the aspirations of the Council.

The MIR advocates a 'masterplanning' approach to the future growth of Carnoustie. The Muir Group agrees with this approach and has a proven track record of taking such projects forward. As a starting point, and to aid discussion, an indicative concept masterplan has been prepared and is attached to this submission. It reveals one option of how the proposal can build upon the existing built development at Carlogie with a range of land uses. While the indicative plan shows housing, retail and leisure/recreational uses, the proposals are located on only a small proportion of land in the ownership of the Muir Group.

Consequently, potential uses highlighted in the MIR could also be easily accommodated such as sports facilities, cemetery provision and community recycling facilities to serve both Monifieth and Carnoustie.

The Muir Group acknowledges the desire of the Council to realise the road improvements to Carlogie Road (A930). It is understood that the necessary road corridor is in the ownership of the Council and the Muir Group would welcome the opportunity of exploring how the proposed site at Carlogie could assist in the funding of this proposal. As stated earlier, the Muir Group is in a unique position in already having ownership of the land thereby significantly enhancing the prospects of development.

Conclusion:

Gedhall Ltd also object to the way in which “Reasonable Alternative 2” (Carnoustie East & West) has been assessed for SEA purposes (as set out elsewhere).

Gedhall Ltd have put forward an alternative option for consideration. Gedhall Ltd object to the “Preferred Option” because;

- it is of a scale that significantly exceeds the TAYplan requirement for Tier 3 settlements;
- there are no public transport links in close proximity to the development, and little likelihood of walking/cycling to and from facilities and services due to the topography;
- there are other opportunities, of an appropriate scale, better located to provide for the level of development required;
- it erodes an area of prime quality (Grade 1 – which is very rare) agricultural land where there are other less significant parcels, and lower quality land, available for development; and
- it is in an elevated area, physically and visually separated from the town, and in an area that has been highlighted by Angus Council themselves (Angus Landscape Study 2003) as being sensitive to new development; and
- its assessment in the SEA is inaccurate. In the discussion of Options (Para 12) the Main Issues Report indicates that the level of new development required for the South Angus area by TAYplan (2012-2024) is not of a scale that would lead to significant new housing and employment related development in Carnoustie in the LDP period, potentially precluding a “masterplanning approach” to new development.

With this in mind, Gedhall Ltd are not therefore satisfied that there is a requirement for the scale of development possible on the preferred area that could not be accommodated on the alternative and smaller sites put forward. The whole of the preferred (Upper Victoria) area is identified by the Hutton Institute as being Grade 1 Agricultural land, a finite and diminishing resource.

Similarly, a significant portion of the Upper Victoria area was considered as a potential allocation (Ref: H) in the 2003 Landscape Capacity Study as having a negative impact on “Landscape Character” (urban character in a countryside location); a negative impact on “Settlement Form and Pattern” (not relating to urban form); a neutral impact on “Views Out or Across Settlement”; and a negative impact on “Views of Settlement” (being visible from A92). This assessment would appear to contradict the view expressed by the Council in the MIR that significant areas would not be visible from the north, particularly if advance planting is required to mitigate long term visual impacts. Overall, we do not believe that the preferred option here would achieve the LDP aim of “protecting our high quality rural landscapes”; utilise existing infrastructure; nor would it make the best use of the opportunities available.

Gedhall Ltd also feel that it is misleading to refer to “significant” developer interest in the area, from the register of submissions, Gedhall Ltd have only been able to identify a single submission relating to this site, from a single developer. Gedhall Ltd have set out in a separate submission comments/objections to the SEA assessment of this and other sites in the area.

Gedhall Ltd object to “Reasonable Alternative 1” because it lies in an area with known transport constraints and significant development costs that could prevent development from being delivered within the LDP Period. The whole of this area is also Grade 1 (prime) quality agricultural land which is a finite and diminishing resource.

Gedhall Ltd object to the way in which “Reasonable Alternative 2” (Carnoustie East & West) has been assessed for SEA purposes. We do not see how it is possible to assess areas at either end of a settlement, subject to very different issues under a single heading and entry on the SEA. The East is identified as being sensitive to development and within the undeveloped

coast which Gedhall Ltd would agree with. The West is identified as being fragmented, and not in close proximity to the schools etc.

Gedhall Ltd also object to the exclusion from this option of the other opportunities to the west of the settlement that could deliver the level of development required.

Gedhall Ltd support an "alternative option 3" for the future growth of Carnoustie/Barry as set out below. Given the potential negative impacts identified above associated with the preferred option, and alternative options, considered in the MIR, there is a further option which has not been considered comprising three parcels of land (shown on the plans emailed under separate cover) which are very modest extensions to the settlement boundary, mostly within defined boundaries or resulting in a very minor new boundary being formed. These sites also utilise very minor areas of productive agricultural land leaving the majority in active production. These sites are available and are a more appropriate size to meet the scale of need identified in TAYplan. They also provide the opportunity for a residential and mixed use development incorporating a Supermarket and petrol filling station as envisaged in the MIR in a location which is as well, if not better, located to the Town Centre than the preferred Option.

They also provide a range and choice of housing sites in the settlement.

- These sites are not identified as "unlikely to be suitable for land allocations in the LDP Period" on the map (at Para 16).
- These sites are all in excess of the 5m above sea level referred to at Q13.
- These are not identified as being Grade 1 (rather 3(1)) agricultural land, and are of a size which makes agricultural use marginal in any event.
- They utilise, as far as possible, existing infrastructure (recently built roads, sewage connections, water supply etc.), which are all currently existing and present either on, or adjacent to, the sites.
- There are no Scheduled Ancient Monuments/Listed Buildings affected or likely to be affected their development.
- Land North & South of Barry Road was assessed as a potential allocation (Ref: D & E – same assessment for both) in the 2003 Landscape Character Study as having a neutral impact on "Landscape Setting"; a positive impact on "Settlement Form and Pattern" (with the Barry Burn providing a natural settlement boundary); a neutral impact on "Views Out or Across Settlement"; and a neutral impact on "Views of Settlement".

The only potential impediment to development is the potential risk of flooding, which the attached Flood Risk Assessment addresses. Further detailed assessment will be undertaken over the coming months, but on a greenfield basis, the site is not at risk of flooding. Greenlawhill & Land adjacent to it was not assessed as part of the Landscape Character Study. The expansion of the existing allocation to incorporate the greenfield land between it and the new road would infill an obvious gap and help to facilitate the redevelopment of a brownfield site, at the gateway to the settlement. This would be achieved within existing defined boundaries and would minimise the loss of Grade 1 agricultural land. The extension to the settlement boundary sought to the west of Hillview would utilise a very modest area of productive agricultural land, and includes the site of a former chicken shed.

Gedhall Ltd have undertaken contaminated land investigations (which we can provide a copy of if required) which have shown the site not to be contaminated. Whilst this land forms part of a wider area considered as part of the Landscape Character Study which performed poorly, Gedhall Ltd feel that the significantly reduced area would not have the negative impacts envisaged of the larger development and that the impact of what is proposed would be neutral on landscape setting, settlement form and pattern, and on the views of and across the settlement. Gedhall Ltd can also confirm that there is active developer interest in

the Land North and South of Barry Road, and we are actively in negotiations with two parties keen to take the site forward as a residential and mixed use opportunity.

Summary table for development in accordance with this option;

Assessment Factor / Summary of benefits and important considerations Adapting to climate change - A flood risk assessment of the Land North and South of Barry Road has concluded that development here would not be at risk of flooding, or exacerbate the risk of flooding elsewhere in a 1 in 200 year (plus climate change) event.

Accessibility - All three sites are in close proximity to public transport, and existing core path and footpath networks.

Infrastructure requirements - Improvements to school capacity can be contributed towards and managed over time. Drainage Impact Assessment will be required, as it would elsewhere. New green infrastructure (e.g. hedges, tree planting within the site, ponds, and sustainable drainage systems) should be provided.

Natural & built heritage (including landscape) - There is the potential to increase the enjoyment of existing cultural heritage and increase the biodiversity value of the land. The area is remote from designated natural heritage sites and will have limited impact on the landscape setting of the town, providing a logical and defensible edge to the settlement in each location.

Community benefits - There is potential to enhance existing green networks and to provide development opportunities for a range and choice of housing sites, a supermarket and a petrol filling station. We also support the retention of the existing allocated employment land (Local Plan Ref: C8). This was allocated due to its strategic location, and its links to the wider transport network.

There is a shortage of employment land in the area (identified in the MIR) resulting partially from the housing regeneration of the former Maltings site, and whilst mixed use development provided through the new LDP might offset the reduction resulting from the Maltings development, this strategic allocation should be retained to provide for future employment needs of the settlement.

Response:

The comments and objections relating to the Strategic Environmental Assessment undertaken for the options will be addressed in the Environmental Report for the Proposed ALDP.

The Proposed ALDP requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the Proposed ALDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. It is important to the implementation of the TAYplan strategy that Local Development Plans do not undermine the delivery of development within the Tier 1 Dundee City by promoting greenfield land release in areas around the Dundee Fringe which could prejudice delivery of the Dundee Western Gateway or undermine redevelopment of the significant supply of brownfield sites within Dundee. The restriction applies primarily to significant greenfield extensions/allocations in the area but does not preclude appropriate brownfield and windfall sites within existing development boundaries coming forward.

Proposed land allocations for residential development in the South Angus HMA consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

The Proposed ALDP requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the Proposed ALDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. It is important to the implementation of the TAYplan strategy that Local Development Plans do not undermine the delivery of development within the Tier 1 Dundee City by promoting greenfield land release in areas around the Dundee Fringe which could prejudice delivery of the Dundee Western Gateway or undermine redevelopment of the significant supply of brownfield sites within Dundee. The restriction applies primarily to significant greenfield extensions/allocations in the area but does not preclude appropriate brownfield and windfall sites within existing development boundaries coming forward.

Proposed land allocations for residential development in the South Angus HMA consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

Recommendation:

Comments noted. This representation will be considered in preparing the Proposed Plan.

Main Issue:

Question: 28

Answer: Yes

Representation: 852/002

Representee: Karen Nicoll

Comment:

Support the option for developing the area beside the Upper Victoria link road as:

1. It is a large site that will accommodate current requirements and future expansion.
2. It is close to the A92.
3. It has mixed use and great potential for future development to provide employment and training opportunities and reduce the housing shortage.
4. It is less likely to require infrastructure improvements to the new road. This option will have to overcome the drainage issues to the west end of town. Developers, the local Council and community group should work together to resolve this.

The alternative option is unlikely to proceed without a significant financial contribution to the road improvements. It is therefore less likely as a viable option in the current economic climate.

The reasonable alternative is too restrictive in size and may impact the existing village.

Response:

Support and comments noted.

Recommendation:

Noted.

Main Issue:

Question: 28

Answer: Yes

Representation: 862/002

Representee: Alistair Todd

Comment:

Presents a cohesive well located opportunity for the long term future development of Carnoustie.

The alternative even if acceptable in planning terms is wholly dependent upon improvement of Carlogie Road (A930) which is likely to be economically unviable throughout the life of the plan.

This is therefore an ineffective option.

Response:

Comments and support for the preferred option noted.

Recommendation:

Noted

Main Issue:**Question:** 28**Answer:** No**Representation:** 856/001**Representee:** A S Franklin**Comment:**

The favoured site, utilising the prime agricultural land round Piskelly up to Upper Victoria, is vast in area. Indeed it is approximately one quarter of the present area of Carnoustie. As the report states, this would cater for a period of time way beyond the time considered in this report. The site has an open nature, is rural in setting. If the Upper Victoria part of this area is developed first, as is favoured in the report, due to the undeniable good links to the main road, it would form a development remote from Carnoustie. It would form a "dormitory" settlement used by commuters to Dundee and Arbroath. Using present roads, it is over four km. to the town centre. I doubt if people this far out would consider themselves to be part of Carnoustie.

It would introduce development into a very open agricultural landscape. I would imagine that there would have to be significant investment to resolve drainage issues associated with any development. It would bring a built up area into open countryside with high visibility from the A92. The land slopes down towards the link road from the North East. Landscaping and structural planting, no matter how high the standard could not hide any development, business or housing. Carnoustie has an image of a "golf town" and the link road is a main access. Do we want visitors first image of Carnoustie to be that of a building site for the next who knows how many years?

The report talks about the ground being used to include business. In the previous Angus Local Plan the ground round Pitskelly was promoted as a business park. This was turned down by the reporter as unsuitable and not appropriate. Does this latest plan envisage the business park site at Carlogie identified for this but not developed being somehow encompassed within this huge area? I would have thought that the objections previously identified would still be valid.

If the link road is to be used initially, surely this would produce ribbon development along it, a process frowned upon by planners. Any such building would have the associated street lighting, creating light pollution and its effect on wildlife.

There would have to be developer input to cope with the increased demand on primary school places as Burnside and Woodlands Primary Schools have limited capacity left. For any pupil walking or cycling to the High School, it could involve a 2km journey, some of it over a muddy unlit track at the back of Shanwell cemetery unless significant work was done to upgrade it.

The whole area is prime agricultural land with access to Carnoustie via the Upper Victoria link and its associated excellent cycle track. The link road, together with the farm roads to Ravensby, Pitskelly, Barry, and Shanwell are used recreationally by walkers, cyclists, joggers and riders in increasing numbers now there is good access to the west end of Carnoustie. The quality of these activities would be affected if the proposed development went ahead in my opinion.

As far as the other sites go, I would rule out the site to the east of Carnoustie as it crosses a boundary road. It is also further for pupils to get to school. The site near Panbride and to the

Representee: Ian D Simpson

Comment:

The preferred option provides the best possible choice in terms of the amount of land available for potential development in that this area can support more homes and businesses than are planned for the period to 2024. The existing road network and opportunity for associated environmental initiatives make this an attractive proposition. Other factors that support this option are:

- a) The proximity to Carnoustie High School
- b) Potential to develop new retail facilities including a supermarket in or around this area.
- c) The option to investigate the realignment of school catchment areas to enable the existing capacity at Carlogie PS to be utilised.

Response:

Comments and support for the preferred option noted.

Recommendation:

Comment noted. This representation will be taken into consideration in the preparation of the Proposed Local Development Plan, Supplementary Guidance, development briefs or masterplans identified within the Action Programme.

Main Issue:

Question: 28

Answer: No

Representation: 788/043

Organisation: Stewart Milne Homes

Representee: Shelley Thomson

Comment:

Consider that land at Clayholes should be preferred site for future development in Carnoustie.

Response:

Comments noted. A development site at Clayholes was submitted during the Initial Awareness Raising Stage. This development site formed Site Reference S5 and was not identified as forming part of any option for the future development of Carnoustie within the Main Issues Report (2012). This development site did not form part of any of the options for the future development of Carnoustie primarily due to the access difficulties to/from the A92.

The Proposed ALDP requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the Proposed ALDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. It is important to the implementation of the TAYplan strategy that Local Development Plans do not undermine the delivery of development within the Tier 1 Dundee City by promoting greenfield land release in areas around the Dundee Fringe which could prejudice delivery of the Dundee Western Gateway or undermine redevelopment of the significant supply of brownfield sites within Dundee. The restriction applies primarily to significant greenfield extensions/allocations in the area but does not preclude appropriate brownfield and windfall sites within existing development boundaries coming forward.

Proposed land allocations for residential development in the South Angus HMA consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

Recommendation:

Noted.

Main Issue:

Question: 28

Answer: No

Representation: 868/016

Organisation: Barratt East Scotland Limited

Agents: Ryden LLP

Chapter 11 Forfar

Chapter 11 - General

Representation: 886/001

Organisation: Royal Burgh of Forfar Community Council

Representee: Mrs Isobel Ross

Comment:

Empahsis should be placed on developing vacant sites within the town e.g. Chapelpark School, Co-op Abbeygate site and South Street Mill.

The lack of hotel accommodation in Forfar requires urgent attention.

The housng figure of 90 additional housing units per year over the next ten years appears sufficient as there are many undeveloped sites due to the economic downturn.

The flexible approach being considered for development proposals at Orchardbank Business Park is welcomed.

Response:

Comments noted, including support for the housing figures and approach towards Orchardbank Business Park.

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP and will identify sites where there is opportunity for future development or redevelopment. Detailed policies based on leisure and tourism will also be considered in drafting the Proposed Plan.

Recommendation:

No change. These representations will be considered in preparing the proposed Plan.

Representation: 885/004

Organisation: GB Oils Limited

Agents: Montagu Evans LLP

Comment:

The LDP should allocate brownfield sites such as Land at Fyfe Street, Forfar within the town prior to the expansion of the town beyond its current development boundary. The site is available for development and is effective.

Response:

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. In so doing, the Proposed ALDP will allocate new housing sites, continue with previous land allocations (where appropriate) and identify existing sites with planning permission or that are under construction. In addition, other windfall sites have potential to deliver housing over the plan period which is sufficient to meet the TAYplan requirements for the West Angus HMA. The preferred option to allow additional housing development on windfall sites will further support a generous supply of housing and provide additional flexibility.

In seeking to maintain an effective 7 year supply of housing land the effectiveness of sites identified for housing will be monitored through the annual Housing Land Audit. Where necessary to maintain a 7 year effective housing land supply additional housing land will be brought forward where necessary.

Detailed policies based on the residential development will also be considered in drafting the Proposed Plan.

Recommendation:

No change. These representations will be considered in preparing the proposed Plan.

Representation: 774/006

Organisation: Historic Scotland

Representee: Andrew Stevenson

Comment:

It is unlikely that development in this area of growth would have an impact on the setting of the scheduled monument Queen Margaret's Inch, chapel and crannog (Index no. 7648), nevertheless its site and setting should be a consideration for the Council should the area expand to the south. The setting of the category B listed Inchgarth House will need to be a consideration for the Council.

Response:

Comments noted.

Recommendation:

Noted.

Representation: 916/023

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

There have recently been some flooding problems related to the height of water levels in Forfar Loch which has caused the backing up of the culverted small watercourses that drain into the loch. Angus Council has undertaken some works recently which are intended to lower water levels to previous levels. The flood prevention authority should be in a position to provide further information on the areas affected.

Representation: 916/059

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Forfar Alternative 1

Flood Risk:-

None Known at site. Any development would need to account for the several small watercourses within the site boundary however large areas are likely to be available for development. Small watercourses and river crossings would need to be accounted for.

Representation: 916/060

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Forfar Alternative 2

Flood Risk:-

None Known at site. An FRA would only be needed if the boundary of the development were to extend to the Lemno Water or included the small watercourse to the east. These are currently outwith indicated area although we understand they are flexible boundaries which may change.

Water Environment:

Note - protection of the Strathmore mineral water aquifer needs to be considered

Representation: 916/058

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Agents:

Comment:

Forfar Preferred

Flood Risk:-

None Known at site. No flood risk apparent.

Representation: 774/007

Organisation: Historic Scotland

Representee: Andrew Stevenson

Comment:

Historic Scotland have some concerns about this area of growth as it may impact on the site and setting of the scheduled monuments Westfield, enclosure SW of (Index no. 6054) and Westfield, enclosures NW of (Index no. 6053) in the north east of the area.

Whilst development may be possible within the majority of the area, any allocations must contain a robust design strategy to avoid impacts on the monuments and their settings in accordance with national and local policy. Additionally the future management of the monuments within the development area must also be addressed. Any allocation of this area could mitigate by design through avoidance of development in the north eastern part of the site, however this may still require mitigation to protect the setting and physical integrity of the monuments.

Response:

Comments noted. The Proposed ALDP policy framework and land allocations will be informed by a range of additional background information, including a Strategic Flood Risk Assessment which will ensure development does not take place in areas of known flood risk or contribute to flooding elsewhere. Detailed policies based on the flood risk framework and built and cultural heritage will be considered in drafting the Proposed Plan.

Recommendation:

Noted. Details to be considered in preparing Proposed Plan.

Representation: 878/004

Organisation: Gowanbank LLP

Agents: Project Management Scotland Ltd.

Comment:

As acknowledged in paragraph 2 on page 74 of the MIR, this site has not been developed due to the effect of the economic downturn. The site owners are working to develop this site and would expect that development will commence within the early part of the LDP period. Gowanbank LLP therefore request that the Gowanbank site is retained in the Local Development Plan as an effective housing site.

Gowanbank LLP is working to develop housing on the Gowanbank site, and through this emerging LDP seeks support from Angus Council to enable it to deliver much needed housing to Forfar.

Response:

It is noted that planning permission in principle was approved for this site, subject to a Section 75 Agreement for 63 residential units in August 2014.

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. In so doing, the Proposed ALDP will allocate new housing sites, continue with previous land allocations (where appropriate) and identify existing sites with planning permission or that are under construction. In addition, other windfall sites have potential to deliver housing over the plan period which is sufficient to meet the TAYplan requirements for the West Angus HMA. The preferred option to allow additional housing development on windfall sites will further support a generous supply of housing and provide additional flexibility.

In seeking to maintain an effective 7 year supply of housing land the effectiveness of sites identified for housing will be monitored through the annual Housing Land Audit. Where necessary to maintain a 7 year effective housing land supply additional housing land will be brought forward where necessary.

Recommendation:

Noted. Details to be considered in preparing Proposed Plan.

Representation: 880/005

Organisation: St Francis Group

Agents: Colliers International Ltd

Comment:

Former Scotia Gas Networks Site, Carseview Road, Forfar:

Angus Council should allocate the site for future mixed use / commercial development, perhaps as a part of a wider masterplanned approach for an Agri-Park.

Other options include the enhancement of the existing Suttieside Industrial Estate or widening the scope of permitted uses at the site.

Response:

Comments noted.

Recommendation:

Noted. Details to be considered in preparing Proposed Plan.

It is submitted that the ASDA store is now an integral part of the function of the Town Centre contributing to its vitality and viability through providing a range of choice and services to residents. The close proximity of the store to the rest of the retail function and the excellent linkages that were provided as part of the store development have allowed this relationship. ASDA recommends that the site should be included within the Town Centre boundary.

A review of the extent of Forfar Town Centre boundary to include the ASDA store would be in line with Option 1 at paragraph 3.40 of the Topic Paper No 6 - Economy which accompanies the MIR, by reviewing their extent, form and function.

Response:

Comments noted. Identification of a network of centres as promoted by Scottish Planning Policy will be considered in drafting the Proposed Plan.

Recommendation:

Detail will be considered in drafting the plan.

Main Issue:

Question: 29

Answer: No answer

Representation: 907/010

Organisation: CHAP Homes

Agents: Halliday Fraser Munro

Comment:

CHAP Homes agree that there is a need to identify appropriate land for housing in Forfar. As identified in the MIR, despite numerous sites being allocated for housing and mixed-use development in the Angus Local Plan Review, there are only a handful of these that have been brought forward. Although the current economic climate has impacted on the delivery of development, appropriate sites can be brought forward that can help meet the delivery targets identified in TAYPlan.

Allocating limited sites for future development and relying on existing land allocations for current delivery will restrict market choice and prevent desirable and viable sites from coming forward during the current recession.

As identified in the MIR (page 74, para 4), Forfar is the largest town in the West Angus Housing Market Area and offers the greatest range of services and facilities. Despite this however, a number of proposed LDP allocations brought forward from the previous Local Plan Review (2009) have not been delivered. Therefore, it may be that there is not enough market choice available. In order that the housing numbers identified in the HNDA are met and there is a 'significant number of new houses' delivered in Forfar (as identified in page 74, paragraph 4), it is crucial that sufficient land is allocated to provide attractive investment opportunities.

Forfar is ideally located adjacent to the A90 to service the surrounding agricultural businesses and is well situated between Dundee and Aberdeen. The site at Westfield lies between the A90 and Forfar, providing a unique opportunity to deliver housing which follows the pattern of existing residential development and increases market choice in the settlement.

It is recognised that the site is located within the catchment of Langlands Primary School, which is identified in the MIR as having limited capacity. However, funds raised from planning gain contributions will alleviate adverse impacts of the development at Westfield. Furthermore, in order to fund works to Forfar Academy and associated youth facilities, the sites allocated in the LDP must be delivered in order that developer contributions can be raised.

CHAP Homes agree that many of the existing housing allocations are still suitable for development, however many have not progressed through the previous Local Plan, therefore, although suitable for development at some point, they may not necessarily be delivered in appropriate timescales. The allocation of a range of sites will help housing delivery throughout the plan. Likewise to ensure the delivery of affordable housing in each phase of the Plan, a range of sites should be zoned.

Response:

Comments noted. The Proposed ALDP will identify sites to meet the full housing land requirement established by the TAYplan SDP for the West Angus Housing Market Area. This may include the allocation of additional greenfield sites, including the incorporation of areas identified as the preferred option and an alternatives option within the Main Issues Report where necessary to assist in meeting the housing land requirements and provide an element of choice across the HMA. Additional land allocations identified in the Proposed ALDP will augment the existing supply of housing land on sites with planning permission and those which are currently under development. The Proposed ALDP will also establish appropriate phasing of sites over the period of the plan and on larger sites may include extending development beyond the plan period . To inform the additional housing land requirement and to ensure that Angus Council maintains a 7 year effective land supply, the continued effectiveness of and progress in the delivery of the housing land supply will be monitored through the annual Angus Housing Land Audit.

Recommendation:

The future housing land requirement for the West Angus HMA will be considered in drafting the plan.

Main Issue:

Question: 29

Answer: No answer

Representation: 786/019

Organisation: Guild Homes

Representee: Mark Guild

Comment:

Guild Homes is currently developing at Wester Restenneth. We anticipate that this scheme will be completed under the current difficult market conditions in 2016. However, there will be a requirement to start opening and preparing new sites prior to the sell out of Wester Restenneth. Therefore it is essential that any new land release is flexible to react and can adapt with the market. We would anticipate a requirement for the land at Turfbeg to be available in 2015 in readiness for development in 2016.

Response:

Comments noted.

Recommendation:

Noted.

Main Issue:

Question: 29

Answer: No answer

Representation: 795/004

Organisation: Strathmore Estates

Agents: Ristol Ltd

Comment:

Strathmore Estates support the identification of Forfar as a tier 2 settlement in the TayPlan and its focus on Orchardbank Business Park and a proposed "Agri-Park". In terms of a development allocations intended to maintain a generous and effective housing land supply and facilitate investment in infrastructure and the delivery of employment land and

the "Agri-Park", Strathmore Estates request that Angus Council give due consideration to land to the west of the town for a mixed use, masterplan led development.

This representation is based on:

1. The strategic status of Forfar as a Tier 2 settlement;
2. The policy requirement to ensure a generous supply of development land to facilitate regional growth objectives, and;
3. The sites accessibility to the A90, linkages to Orchardbank Business Park and landscape capacity to accommodate development. Identifying the land shown on the accompanying Figure for development, even as a long term location for growth, would create confidence in the development plan process and support strategic investment decisions to reflect the principles of sustainable economic growth, as advanced by the Scottish Planning Policy.

Response:

Comments noted, including support for the preferred option.

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. In so doing, the Proposed ALDP is required to consider sites within settlement boundaries before sites on the edge of or outwith settlements and give priority to the reuse of previously developed buildings and land in line with TAYplan Policy 1. The preferred option to allow additional housing development on windfall sites will further support a generous supply of housing land and provide additional flexibility in line with the expectations of Scottish Planning Policy.

In seeking to maintain an effective 7 year supply of housing land the effectiveness of sites identified for housing will be monitored through the annual Housing Land Audit. Where necessary to maintain a 7 year effective housing land supply additional housing land will be brought forward where necessary. To allocate this land at Lochmill which was not considered as Main Issues Report option and is outwith the development boundary would not be consistent with TAYplan Policy 1 and would potentially undermine development of existing sites.

Recommendation:

No change. The future housing land requirement for the West Angus HMA will be considered in drafting the plan.

Main Issue: 0

Question: 29

Answer: No answer

Representation: 882/001

Representee: George Morrison

Comment:

Land at Turfbeg should be split into two areas:

- 1) the land given safeguard status; and
- 2) land to the west of the safeguarded site

Response:

Comments noted.

Recommendation:

No change. These representations will be considered in preparing the proposed Plan

Main Issue:

Question: 29

Answer: No

Representation: 887/004

Representee: Mr G K Robertson

Agents: Savills

Comment:

Paragraph 7 of the Forfar Settlement Strategy states that many of the existing housing land allocations in Forfar are still considered to be suitable for development and it would be counterproductive to allocated additional large-scale new sites for housing in the early part of the LDP period.

Consider that this is contrary to Paragraph 4 which identifies a need and demand for housing in the short term by 2018/19. The allocation of additional sites at Forfar is essential to address this identified need and to ensure that there is sufficient land allocation should the current allocated sites not be delivered in the short/medium term.

Allocation of the land at South Suttieside Farm forms a natural extension to the settlement boundary and will ensure that an effective housing land supply in Forfar can be maintained. This land is also outwith the areas identified by Angus Council as being unsuitable for development.

Response:

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. In so doing, the Proposed ALDP is required to consider sites within settlement boundaries before sites on the edge of or outwith settlements and give priority to the reuse of previously developed buildings and land in line with TAYplan Policy 1. The preferred option to allow additional housing development on windfall sites will further support a generous supply of housing land and provide additional flexibility in line with the expectations of Scottish Planning Policy.

In seeking to maintain an effective 7 year supply of housing land the effectiveness of sites identified for housing will be monitored through the annual Housing Land Audit. Where necessary to maintain a 7 year effective housing land supply additional housing land will be brought forward where necessary. To allocate this land at Suttieside which is outwith the development boundary would not be consistent with TAYplan Policy 1 and would potentially undermine development of existing sites.

Recommendation:

The future housing land requirement for the West Angus HMA will be considered in drafting the plan.

Development Area in Forfar, whose location would be defined at the Local Development Plan stage.

However, there are a number of matters which give rise to some degree of dubiety about the practical success or otherwise of the initiative, namely:

1) There is an identified over-supply of employment land in the West Angus area, which includes Forfar. This oversupply means that at least 5-years of land supply already exists. Indeed the MIR (page 92) discussion about Forfar at Para 3 confirms the supply is likely to provide employment land to meet the TAYplan requirement for the LDP period (2014-2024). This being the case, it is considered that the concept of an Agripark may only work if it helps 're-locate' established businesses into a purposeful location for related activity if indeed there is demand for such an approach from these businesses. It is not likely to be effective in meeting additional 'new demand' for new employment land simply because of the over-supply available. Therefore the capacity of an Agripark is brought into question, in terms of scale of land required to satisfy any demand, and in turn the identification of an appropriate location comes into question also although we would support the location in or around the Forfar Mart or on a highly accessible greenfield location with proximity to the A90.

2) Whilst established agricultural businesses may exist which may be inclined to re-locate to an Agripark, we are of the view that this would merely create further development opportunities on brownfield sites which they would have vacated, which in land use planning terms the residual land may be considered to take priority over the release of further greenfield sites. This may have a further impact on the employment land supply. Therefore it might be better for the Council to facilitate the development of existing allocated employment sites beforehand.

3) Economically, we are concerned that the Council's expectation for the delivery of an Agripark would have to be funded and supported by the private sector, because it states: "In light of continuing restrictions on public finances, it is unlikely that development of such a facility would be funded by Angus Council". (Page 93 of MIR, para 9). It is very unlikely in such conditions therefore that the concept would develop or achieve a critical mass without public intervention, given the strain on finance across all sectors. Lawrie and Symington has itself invested significant funds of its own into the refurbishment and expansion of the Forfar Mart in recent years. In relation to the MIR suggestion of a reasonable alternative option in the context of the agripark, it has been stated above that Lawrie and Symington has invested in the Forfar Mart in recent years and this demonstrates its commitment to staying in Forfar, at the Mart site. Therefore if an agripark concept were to be advanced then it could focus a 'hub' around the Mart site. In such a scenario, Lawrie and Symington would be willing to support the Council in principle but would encourage the Council to share its resources in kind through partnering or other joint approach if indeed a business case were shown to be feasible.

Representation: 881/008

Organisation: Scotia Homes

Agents: Barton Willmore

Comment:

While Scotia Homes are not farmers or in the agricultural business and cannot comment fully on the viability of such an enterprise, the opportunity for an agripark to form an integral part of a planned expansion of Forfar is evident and as such can confirm that such a development would be desirable and could comfortably be accommodated within Scotia Homes interests at Westfield

Representation: 795/005

Organisation: Strathmore Estates

Agents: Ristol Ltd

Comment:

See response to Question 29.

Representation: 886/002**Main Issue:** 0**Question:** 30**Answer:** Yes**Organisation:** Royal Burgh of Forfar Community Council**Representee:** Mrs Isobel Ross**Comment:**

The agripark is seen as a positive move, but any sites vacated within the town should be developed to prevent further unoccupied sites.

Representation: 880/003**Organisation:** St Francis Group**Agents:** Colliers International Ltd**Comment:**

1) Prospect for an Agri Park In principle, a business park specifically for agricultural businesses is supported. In terms of logistics, efficiency of business operations and overall 'strength in numbers' this would likely be of positive commercial benefit to existing and potential agricultural businesses and help the Forfar and Angus agricultural sector's economy to develop in future.

The SGN site could provide an important land resource to Angus Council or other private sector commercial operators as part of a 'joined-up' approach to regenerating the area and delivery of the AgriPark concept. St Francis Group note how TAYplan requires the Local Development Plan to define a specific location and spatial strategy for an Agri Park and note that Angus Council has identified siting options for the facility.

2) A business case for the Agri Park ? We consider there to be a number of matters which give rise to some degree of dubiety about the practical success or otherwise of an Agri Park initiative, namely:

a. There is an identified over-supply of employment land in the West Angus area, which includes Forfar. This over-supply means that at least 5- years of land supply already exists. Indeed the MIR (page 92) discussion about Forfar at Para 3 confirms the supply is likely to provide employment land to meet the TAYplan requirement for the LDP period (2014-2024). This being the case, it is considered that the concept of an Agri Park may only work if it helps 're-locate' established businesses into a purposeful location for related activity if indeed there is demand for such an approach from these businesses. It is not likely to be effective in meeting additional 'new demand' for new employment land simply because of the over-supply available. Therefore the capacity of an Agri Park is brought into question, in terms of scale of land required to satisfy any demand, and in turn the identification of an appropriate location comes into question also although we would support the location in or around the Forfar Mart or on a highly accessible greenfield location with proximity to the A90.

b. Whilst established agricultural businesses may exist which may be inclined to re-locate to an Agri Park, we are of the view that this would merely create further development opportunities on brownfield sites which they would have vacated, which in land use planning terms the residual land may be considered to take priority over the release of further greenfield sites. This may have a further impact on the employment land supply. Therefore it might be better for the Council to facilitate the development of existing allocated employment sites beforehand. The SGN site can provide an immediately effective employment land opportunity in its own right. However it may make better commercial sense to have the SGN site identified within an allocation for "mixed use development opportunity" to enable a wide and flexible option of future land uses to come forward.

c. Economically, St Francis Group are concerned that the Council's expectation for the delivery of an Agri Park would have to be funded and supported by the private sector, because the Council's MIR document states: "In light of continuing restrictions on public finances, it is unlikely that development of such a facility would be funded by Angus Council". (Page 93 of MIR, para 9). We consider it to be very unlikely in such conditions that the concept would develop or achieve a critical mass without public intervention, given the strain on finance across all sectors. The SGN site will require remediation to bring it into effective future use which may add additional costs to the delivery of the site for future commercial use. It is therefore difficult to envisage a project such as Agri Park to be delivered entirely by one sector or one developer and it would seem prudent instead for a partnership or joint working arrangement with the Council to realise the concept. In relation to the MIR suggestion of a reasonable alternative option in the context of the agripark, if an agripark concept were to be advanced then it could focus a 'hub' around edge of the Suttieside Industrial Estate, bringing already established agricultural operators into the plan, such as the Auction Mart site. In such a scenario, St Francis would be willing to support the Council in principle to site an Agri Park at this location, but the Council must share its resources in kind through partnering or other joint approach if indeed a business case were shown to be feasible.

Response:

Comments noted.

Recommendation:

Detail to be considered in drafting plan.

Chapter 11 – Question 31 Do you agree with the preferred option for the development of land in and around Forfar? Please give reasons for your answer and (if appropriate) describe any alternative option that you would prefer.

Main Issue: Question: 31 Answer: No

Representation: 881/007

Organisation: Scotia Homes

Agents: Barton Willmore

Comment:

Land at Westfield should be identified, for residential led mixed use development, in addition to Turfbeg. This would establish the planned direction for growth of Forfar for the TAYplan period and potentially beyond.

Representation: 851/004

Organisation: Muir Group

Agents: James Lohead Consultancy

Comment:

The Turfbeg Option:

The Muir Group do not consider that the option to grow Forfar at Turfbeg will deliver the obvious potential of the town. The site lacks any kind of landscape setting. It is extremely exposed and does not relate well to the town. In fact development in this area would have an adverse impact on the setting of Forfar, breaching the acknowledged skyline. It is not considered that this issue in particular can be mitigated.

There are considered to be fundamental flaws in considering the allocation of land at Turfbeg which can be summarised as:

- An extremely open landscape with limited ability to absorb development.
- The site does not relate well to the existing form of the town and would be highly visible from long distances to the north and west.
- There would be severe conflict with the long standing planning objective of protecting the visual and environmental quality of the Forfar Loch Country Park.
- Substantial investment in the drainage network would be required throwing into doubt the effectiveness of the site.
- The existing road network, particularly around Taylor Street/Turfbeg Road and Taylor Street with Brechin Street is not capable of accommodating the additional traffic generated by the proposals at Turfbeg.
- Historically and culturally, land to the north of Forfar Loch is considerably more important than that to the south.
- The previous housing site at Turfbeg, completed some 8 years ago, was viewed by the Council and the Inquiry Reporter as a rounding off of development in this location.

Overall, Turfbeg represents a very poor example of suburban sprawl, poorly connected with the town, existing facilities and newly established areas of employment (Orchardbank). It represents the start of the encirclement of the Loch and should be resisted. However, while there are very real concerns over the suitability of Turfbeg as a development site, it is the danger of losing the potential that Westfield clearly has were the Council to identify Turfbeg as their preferred location for the growth of Forfar.

The Westfield Option:

There is an exciting opportunity to focus development on the principal gateway into Forfar, planning for a range of land uses and creating a sustainable community that would complement existing surrounding land uses. Other options for growth simply do not have the attributes that Westfield clearly has in abundance. To overlook Westfield as the preferred option would be a missed opportunity by the Council to create something very special. There is no doubt that the track record of the Muir Group and Scotia Homes (the two principal landowners) proves that Westfield can deliver the ambitions of Angus Council.

Westfield represents the best opportunity to accommodate the scale of future development for Forfar building upon, and complementing, the adjacent Orchardbank Business Park thereby creating an enviable gateway to Forfar. Existing adjacent uses include the Council offices as well as leisure uses in the form of MacDonald's with KFC and Marston Inns about to locate to this area. The identification of Westfield as the preferred area for growth will enhance the potential to attract a tourist orientated centre at the acknowledged gateway to Forfar.

The land is well located in relation to the primary road network within the town and to the A90(T) Forfar bypass. The Westfield area is also better served by existing public transport links.

Unlike other options, Westfield has a landscape setting which is capable of accommodating development while respecting the overall setting of the town. The land is in the ownership or control of the Muir Group and Scotia Homes thereby ensuring the effective delivery of the development. The two relatively small scheduled ancient monuments can be safeguarded and their potential maximised. Their scale and location will not have any effect on developing the remaining land and their presence should not be seen as a negative but as a positive as their settings will be enhanced.

For many years the policy of Angus Council was to safeguard land west of Westfield Loan from ad-hoc development, seeking rather an integrated and holistic approach to the favoured area for development. The proposals by the Muir Group/Scotia Homes provide the very opportunity the Council have been seeking to achieve. In this regard an initial indicative master plan has been prepared and attached to this submission. It clearly shows how the site can accommodate the scale of growth required by respecting the landscape and seeking to enhance the existing landscape features. The Muir Group are working closely with Scotia Homes to explore all the potential options of successfully developing this area of Forfar. It is difficult to understand why Westfield is not the preferred option for the Council. Indeed, this is clearly evident when considering and comparing the 'SEA Implications' for both Turfbeg and Westfield sites as outlined in the MIR.

Conclusions:

The unique location of Westfield provides the opportunity for a planned neighbourhood extension to Forfar enabling the integration of housing with existing employment land and with good links both into the town and the wider area. The landscape setting of this part of Forfar is capable of accommodating development while respecting the overall setting of the town. Developing land at Westfield represents the best opportunity to meet the aspirations of the Council and realise the vision as a place where first class quality of life can be enjoyed by all.

Representation: 888/002

Organisation: John F Graham Chartered Architect

Representee: John Graham

Comment:

The land to the North of Turfbeg should be relegated and Westfield promoted as the preferred option for development in the latter part of the Plan period. Up to and including the 2006 Public Inquiry, the Council's consistent view was that Westfield was the best location for Forfar's long term expansion, a view largely based on the Angus Landscape Capacity Study 2003 and embodied in the Assessment of Possible Development Areas, Background Paper, DALP 2003. This was reinforced by an analytical Landscape Assessment carried out on behalf of the site promoter prior to the 2006 Public Inquiry. Despite this overwhelming expert evidence to the Inquiry, the Reporter chose to disagree and concluded that Turfbeg was more appropriate for new housing and should be 'safeguarded'. The Council accepted the Reporter's recommendation on 16 Nov 2006 and the 'safeguarded' Turfbeg site included in the Adopted Local Plan.

Whilst the Council's concession may have been inevitable, it seems inconceivable that its original, strongly held view could have been so fundamentally altered, given the lack of compelling argument in the Reporter's findings. There can be no doubt that development over the northern skyline would have a massive adverse visual impact. The fact that Forfar sits in a 'bowl' and has already trickled over the northern rim does not render the situation irretrievable.

Structural landscaping could mitigate the existing damage and it would be wrong to allow widespread overflowing into a visually sensitive area, simply because minor spillage has already taken place. Nor does the climate change argument in the MIR stand up. The important factor is protection from the cold north wind, not from the warmer south west and development here is on the wrong side of the ridge. In summary, nothing has changed since the original landscaping studies were carried out, studies which clearly demonstrate that Westfield is still the best location for the expansion of the town.

Representation: 884/001

Representee: Mr BJD Lyburn

Agents: R Wright & Co.

Comment:

Consider that Turfbeg should not be considered the preferred option for residential development. Alternative Option 1 - Land at Westfield should be considered the preferred option.

Representation: 887/005

Representee: Mr G K Robertson

Agents: Savills

Comment:

Do not agree with this preferred option and instead support Alternative Option 2 for the allocation of land at Suttieside to the North of Forfar.

Also do not consider that the new housing allocation should be restricted to be delivered after 2019. It has been identified in the plan that there is demand for housing land in this area and that the previously allocated sites have not been delivered during the plan period. There is a risk that the existing allocated sites will not be delivered in the short to medium term.

The land at South Suttieside Farm represents an effective housing site that can be delivered during the plan period. Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits identifies the criteria for assessing an effective housing sites. Each of the criteria have been assessed in turn below:

- Ownership – The site is in the ownership of our client Mr G K Robertson who is interested in the site being developed for residential led development
- Physical – The site is free from physical constraints that would prevent development occurring at this location. The site benefits from vehicular access and forms a natural extension to the north of the settlement.
- Contamination – there is no known contamination at the site.
- Deficit Funding – no public funding would be required to bring this site forward for development.
- Marketability – Our client has already received interest from a number of housebuilders. This market interest in the site demonstrates that the site can be delivered during the plan period.
- Land use - Angus Council has identified this site as an alternative option which demonstrates that housing in the preferred use for this site.

As shown above, the land at South Suttieside Farm is an effective housing site and it is requested that Alternative Option 2: Suttieside North is allocated in the Proposed Plan. This

site is located within an existing mixed use area with existing residential, business and leisure uses. Forfar Athletic is also located in this area of Forfar. A residential led development at this location will attract an increased population to this part of the town and will benefit the existing businesses. This site also has the capacity to accommodate the new required primary school. It is also identified in the Main Issues Report that the Council is seeking an 'agripark' to provide a new business park specifically for agricultural businesses. There is sufficient land to provide space for business and commercial/leisure uses in addition to housing should there be a requirement.

The Forfar Settlement Strategy identifies that this site is not the preferred option as it is principally open agricultural land and new development is likely to have adverse visual impacts unless supported by substantial areas of new landscaping. The site can be developed to create a high quality attractive landscape setting to complement and enhance the existing land uses and views. It is noted that successive local plans have failed to support the development of land at this location. However, it should be noted that the Main Issues Report specifically recognises that many housing sites in Forfar have not been developed in accordance with anticipated timescales. This demonstrates a need to allocate additional sites that can be delivered during the plan period.

It has been demonstrated above that the land at South Suttieside Farm is an effective housing site that will ensure that the Council maintains an effective land supply in Forfar and can meet existing demand. It is therefore requested that it is allocated as a housing site in the Proposed Plan.

Representation: 907/011

Organisation: CHAP Homes

Agents: Halliday Fraser Munro

Comment:

CHAP Homes disagree with the preferred option for development at Forfar and maintain that the land at Westfield should be identified as a preferred option.

As stated in paragraph 12, the only feasible option for the future development of new homes is to allocate sites around Forfar, therefore sites outwith the settlement boundary need to be considered.

However, as shown in the map on page 78, there is significant land around Forfar that is unsuitable for new land allocations. This restricts the opportunity to develop north, east or south of the settlement. Therefore, it seems logical to bring forward development opportunities located adjacent to the settlement, while still being within the defensible boundary of the A90 to the west.

In comparing the preferred option of land north of Turfbeg with the alternative option at Westfield, there is very little difference in the assessment of these sites and we will consider this further below. For clarification, the site that is being promoted by CHAP Homes does not include the entire area of land identified in Map C to the west of the settlement. A much smaller area of land extending to 5.44 hectares is being considered as shown in the enclosed plan.

As stated in the MIR in relation to the preferred option, development on this site is unlikely to occur until 2019 and part of this proposed site is already allocated in the current Local Plan Review (2009). This will therefore narrow the opportunities for further investment in Forfar and limit market choice. As the existing allocation has not yet been progressed, allocating further adjacent land will simply lead to further delay of delivery, whilst holding up the progression of alternative viable sites.

Both the site north of Turfbeg and at Westfield are considered to be suitable in terms of landscape and visual impact. Although, as discussed the site proposed is small in comparison to the wider proposals at Westfield and the preferred site. This offers the opportunity to deliver a relatively small scale site which integrates well with the surrounding landscape and land uses while making a meaningful contribution to housing delivery and availability.

Opportunities exist on both sites to create footpath and cycle links. The site at Westfield is well related to a number of the surrounding core paths, providing good links around Forfar. The physical barrier to the green network created by the A929 does not impact directly on the site at Westfield due to the existing trees within in and surrounding this site.

As recognised in the MIR, the alternative option 1 allocations are "well related to the built up area" and none more so that the site at Westfield which is positioned south and west of existing residential development. This offers the opportunity for the proposal to easily integrate with surrounding land uses, connect to existing services and utilities and is well served by existing road infrastructure.

Given the benefits created by the location of this site and the fact that there is limited up-front infrastructure costs, the developer can therefore deliver on site affordable housing and significant developer contributions without the site becoming un-viable.

The MIR identifies that there are Schedule Ancient Monuments located to the west of Westfield Loan. The most relevant to the Westfield site is an enclosure, located to the north west of the site and of which a small section lies within the site boundary. However, this will not impact on the proposal and will comply with the Council's preference to "consolidate the existing urban area in the eastern and north eastern parts of the option area" (page 81).

The MIR recognises that the site is well located to the A90 and the Lochlands junction, creating effective vehicular access to the Trunk Road and throughout the settlement.

CHAP Homes recognise that the site is located outwith the centre of the settlement; however it is closer than a number of proposed and allocated sites and is closer to Longlands Primary School than the preferred development option.

It is identified in the MIR (page 81) that all the sites adjacent to Westfield may form a large enough designation to deliver an 'agripark', but that the developer is not proposing this type of development. As CHAP Homes are looking at a small section of this wider option, we cannot confirm if this is the case, however as stated in page 80, the preferred option north of Turfbeg is proposed for "building new homes and business premises". This does not guarantee the delivery of an 'agripark'.

Both the preferred site and the land proposed at Westfield are identified as having no high flood risk and are identified as having the same SEA implications.

Response:

Comments noted. The Proposed ALDP will identify sites to meet the full housing land requirement established by the TAYplan SDP for the West Angus Housing Market Area. This may include the allocation of additional greenfield sites, including the incorporation of areas identified as the preferred option and an alternatives option within the Main Issues Report where necessary to assist in meeting the housing land requirements and provide an element of choice across the HMA. Additional land allocations identified in the Proposed ALDP will augment the existing supply of housing land on sites with planning permission and those which are currently under development. The Proposed ALDP will also establish appropriate phasing of sites over the period of the plan and on larger sites may include extending

development beyond the plan period . To inform the additional housing land requirement and to ensure that Angus Council maintains a 7 year effective land supply, the continued effectiveness of and progress in the delivery of the housing land supply will be monitored through the annual Angus Housing Land Audit.

Recommendation:

The future housing land requirement for the West Angus HMA will be considered in drafting the plan.

Main Issue: 0

Question: 31

Answer: No

Representation: 879/001

Representee: Grace Murray

Comment:

Do not consider that Turfbeg is the best option for future development, for the following reasons:

- * Will impact on the general tranquillity of the area;
- * Will hav a negative impact on local wildlife;
- * The fields are prone to flooding;
- * Development would lead to further access problems on Taylor Street

The alternative options would be preferable. Land at Westfield has better transport links and would be convenient for staff at Orchardbank, whilst the land at Suttieside would have no negative impacts on any residents.

Representation: 883/001

Representee: Jean & Alex Smith

Comment:

Do not consider that Turfbeg should be the preferred option for future residential development around Forfar.

Representation: 882/002

Representee: George Morrison

Comment:

Turfbeg should not be the preferred option for long-term housing development around Forfar. The Alternative Option 1 - Land at Westfield is the best option.

Response:

Comments noted. The Proposed ALDP policy framework and land allocations will be informed by a Habitat Regulations Appraisal as required under the Conservation (Natural Habitats & c) Regulations 1994, a Transport Appraisal which will consider local and strategic traffic impacts and a Strategic Flood Risk Assessment which will ensure development does not take place in areas of known flood risk or contribute to flooding elsewhere. Detailed policies based on the flood risk framework will also be considered in drafting the Proposed Plan.

Notwithstanding this, the Proposed ALDP will identify sites to meet the full housing land requirement established by the TAYplan SDP for the West Angus Housing Market Area. This may include the allocation of additional greenfield sites, including the incorporation of areas identified as the preferred option and an alternative option within the Main Issues Report where necessary to assist in meeting the housing land requirements and provide an element of choice across the HMA. Additional land allocations identified in the Proposed ALDP will augment the existing supply of housing land on sites with planning permission and those which are currently under development. The LDP will also establish appropriate phasing of sites over the period of the plan and on larger sites may include extending development beyond the plan period . To inform the additional housing land requirement and to ensure

that Angus Council maintains a 7 year effective land supply, the continued effectiveness of and progress in the delivery of the housing land supply will be monitored through the annual Angus Housing Land Audit.

Recommendation:

No change to Preferred Option. The future housing land requirement for the West Angus HMA will be considered in drafting the plan.

Main Issue: 0

Question: 31

Answer: No

Representation: 908/001

Representee: Marian McLean

Comment:

Wish to object to any type of industrial or domestic development in the field behind Taylor Street and the Kirriemuir road (i.e. Land at Turfbeg), the reason being this field would appear to be a flood plain.

Response:

Comments noted. The Proposed ALDP policy framework and land allocations will be informed by a range of additional background information, including a Strategic Flood Risk Assessment which will ensure development does not take place in areas of known flood risk or contribute to flooding elsewhere. Detailed policies based on the flood risk framework will also be considered in drafting the Proposed Plan.

Recommendation:

No change to Preferred Option.

Main Issue:

Question: 31

Answer: No view

Representation: 880/004

Organisation: St Francis Group

Agents: Colliers International Ltd

Main Issue:

Question: 31

Answer: Yes

Representation: 798/031

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Forfar preferred option:

Subject to the findings of the HRA:

River Tay SAC, South Esk SAC - screen in for consideration of likely significant effect. There may be watercourses on this site which flow into these SACs.

SSSIs: Restenneth Moss, and Rescobie - Balgavies Lochs, Turin Hill SSSI: There are unlikely to be any direct or indirect impacts to these sites from the preferred development option.

Climate change, accessibility natural heritage, infrastructure and community benefits: (summary table - page 80) Scottish Natural Heritage welcome these for the preferred site.

Landscape and visual:

The relatively flat landform offers potential for development, although the site appears remote from main settlement, which is reinforced by the intervening Forfar Loch Country Park. Opportunities to improve the relationship between the site and the Country Park are therefore supported.

Comments on alternative options:

Alternative option 1:

Subject to the findings of the HRA: River Tay SAC - Screen in for likely significant effect as watercourses on this site may flow into Forfar Loch and the River Tay SAC. The existing settlement edge is visible and defines the skyline from the north (as presented in Map D). Therefore new development could improve settlement edge rather than adversely impact. The relatively flat landform offers potential for development with mitigation by woodland and tree lines reflecting local landscape character - these should be retained/enhanced and links between them. It is important to maintain separation between Forfar and Lunanhead.

Alternative option 2:

Subject to the findings of the HRA: River South Esk SAC - screen in for likely significant effect as watercourses from this site may flow into the SAC. Landscape and visual impacts: Scottish Natural Heritage agree that there is potential for these to vary across the site. However, there are opportunities to improve the settlement edge character and the western and southern entry into Forfar with careful sensitive design.

Response:

Comments noted. The Proposed ALDP policy framework and land allocations will be informed by a Strategic Environmental Assessment as required under the Environmental Assessment (Scotland) Act 2005 and a Habitat Regulations Appraisal as required under the Conservation (Natural Habitats & c) Regulations 1994. In addition, the Proposed ALDP will be supported with an updated Landscape Capacity Study for Forfar. Detailed policies based on landscape character will be considered in drafting the Proposed Plan.

Recommendation:

No change. These representations will be considered in preparing the proposed Plan

Main Issue:

Question: 31

Answer: Yes

Representation: 877/002

Organisation: Lawrie and Symington Limited

Agents: Colliers International Ltd

Comment:

In principle, Lawrie and Symington agrees with the preferred option for the future development of land, identified as being land to the north west of the town, bounded by the A90 and A926. In principle this could offer sufficient land for a range of uses, potentially including the agripark concept. This would be founded on the basis of excellent accessibility, facilitated by the grade separated junction of the A90 and direct access to the A926. Indeed this is broadly the area where there is a cluster of related agricultural businesses which may demonstrate synergies and form a base for a concentration of these activities. An alternative land use location for an agripark could be as indicated in Question 29, focussed around the existing Forfar Mart, owned and operated by Lawrie and Symington.

However it is likely that other third party land and its availability would be required to enable assembly and development.

This appears to concur with the MIR suggested Alternative Option 2, discussed on page 102, at paragraph 33.

Response:

Comments noted, including support for the Preferred Option.

Recommendation:

No change. These representations will be considered in preparing the proposed Plan

In terms of the options to release land at Westfield, this land has been examined by successive Reporters at the time of the Angus Local Plan and the Angus Local Plan Review. On three occasions the land at Westfield was considered inappropriate for development. At the time of the ALPR enquiry the Reporter concluded that in "landscape terms the settlement boundary should not be extended beyond Westfield Loan."

Further in the summary of his conclusions on possible development at Westfield the Reporter indicated that in his opinion "Visual impact would be significantly adverse and the landscape setting of Forfar would be reduced to an unacceptable extent."

Clearly nothing has altered in terms of the landscape setting of Forfar and therefore it is fair to say that this view is still relevant and the site should not be allocated for development.

In terms of the land at Suttieside, Guild Homes agrees with Angus Council in that this site has a strong countryside character and is not well related to the built up area of Forfar. Further there are access issues associated with this area. As such the area should not be allocated for development.

Response:

Preferred Option:

Support noted.

Alternative Option 1 & Alternative Option 2:

Comments noted. The Proposed ALDP will identify sites to meet the full housing land requirement established by the TAYplan SDP for the West Angus Housing Market Area. This may include the allocation of additional greenfield sites, including the incorporation of areas identified as the preferred option and an alternatives option within the Main Issues Report where necessary to assist in meeting the housing land requirements and provide an element of choice across the HMA. Additional land allocations identified in the Proposed ALDP will augment the existing supply of housing land on sites with planning permission and those which are currently under development. The Proposed ALDP will also establish appropriate phasing of sites over the period of the plan and on larger sites may include extending development beyond the plan period . To inform the additional housing land requirement and to ensure that Angus Council maintains a 7 year effective land supply, the continued effectiveness of and progress in the delivery of the housing land supply will be monitored through the annual Angus Housing Land Audit.

Recommendation:

No change to Preferred Option. The future housing land requirement for the West Angus HMA will be considered in drafting the plan.

Main Issue:

Question: 31

Answer: Yes

Representation: 795/006

Organisation: Strathmore Estates

Agents: Ristol Ltd

Comment:

See response to Question 29.

Response:

Support noted.

Recommendation:

No change to Preferred Option.

Chapter 12 Kirriemuir

Chapter 12 - General

Representation: 916/061

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Kirriemuir Preferred

Flood Risk:-

None Known at site. No flood risk apparent.

Water Environment:

Kirriemuir wastewater treatment works is at capacity.

Representation: 916/062

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Kirriemuir Alternative 1

Flood Risk:-

None Known at site.

Small watercourse would need to be considered in any FRA along with all sources of flooding.

Water Environment:-

Kirriemuir wastewater treatment works is at capacity.

Representation: 916/063

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Kirriemuir Alternative 2

Flood Risk:-

None Known at site.

Small watercourse would need to be considered in any FRA along with all sources of flooding.

Water Environment:-

Kirriemuir wastewater treatment works is at capacity.

Representation: 916/064

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Kirriemuir Alternative 3 (Kirriemuir East)

Flood Risk:-

None Known at site.

Small watercourse would need to be considered in any FRA along with all sources of flooding.

Water Environment:-

Kirriemuir wastewater treatment works is at capacity.

Representation: 916/065

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Kirriemuir Alternative 3 (Kirriemuir South West)

Flood Risk:-

None Known at site. Small watercourse would need to be considered in any FRA along with all sources of flooding.

Water Environment:-
Kirriemuir wastewater treatment works is at capacity.

Representation: 916/066

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Kirriemuir Alternative 3 (Kirriemuir West)

Flood Risk:-

None Known at site. No flood risk apparent

Water Environment:-

Kirriemuir wastewater treatment works is at capacity.

Representation: 916/024

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

There is a flood prevention scheme on the Gairie Burn however this does not meet the current standards of protection and future proposals for development will require to consider the risk of flooding.

There was a flood during the autumn of 2009 that was reported to have caused significant flooding in the area of Rosewell Road, Maryton.

Response:

The Proposed ALDP policy framework and land allocations will be informed by a range of additional background information, including a Strategic Flood Risk Assessment which will ensure development does not take place in areas of known flood risk or contribute to flooding elsewhere. Detailed policies based on the flood risk framework will also be considered in drafting the Proposed Plan.

In terms of Kirriemuir Waste Water Treatment Works, since publication of the Main Issues Report Scottish Water has undertaken a quality project. This work was completed in September 2014 and has resulted in an increase in capacity at the works to approximately 150 housing units.

Recommendation:

Comments noted. Detail to be considered in drafting plan.

Representation: 891/003

Organisation: J & J Learmonth

Representee: John Learmonth

Agents: The Charlton Smith Partnership

Comment:

Land at Herdhill / Martin Park, Kirriemuir:

The Local Development Plan will require to meet the strategic housing needs to be set out in the strategic Tayplan. Kirriemuir is cited in Tayplan as a settlement within which housing sites should be sought.

This proposed site at Little Herdhill – Martin Park is considered to represent a logical opportunity to build on adjacent existing infrastructure. It offers the opportunity to resolve an anomaly, in that the site is a rectangle currently excluded from the settlement boundary whilst being bounded on three sides by residential/town uses.

The allocation of this site would fulfil the requirements of the Scottish Planning Policy by being adjacent and surrounded by the town settlement boundary and being readily accessible by

all transport modes to all town facilities, and especially those for recreation and sport. It offers the opportunity to make a statement about Kirriemuir in its own function as a tourist town with local produce and crafts on offer and its role as Gateway to the Glens.

J & J Learmonth therefore commend this Little Herdhill – Martin Park site for consideration by Angus Council in their assessment of suitable sites to put forward in the Main Issues Report of the Angus Local Development Plan.

Representation: 891/004

Organisation: J & J Learmonth

Representee: John Learmonth

Agents: The Charlton Smith Partnership

Comment:

Sunnyside - Phase 3, Kirriemuir:

The Local Development Plan will require to meet the strategic housing needs to be set out in the strategic Tayplan. Kirriemuir is cited in Tayplan as a settlement within which housing sites should be sought.

This proposed site at Sunnyside is considered to represent a logical opportunity to build on existing and planned infrastructure. Thus it could fulfil the creation of a more attractive visual edge to Kirriemuir, whilst already having been assessed as fulfilling accessibility and transportation policy criteria.

The allocation of this site would fulfil the requirements of the Scottish Planning Policy.

J & J Learmonth therefore commend this Sunnyside extension site for consideration by Angus Council in their assessment of suitable sites to put forward in the Main Issues Report of the Angus Local Development Plan.

Response:

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. In so doing, the Proposed ALDP is required to consider sites within settlement boundaries before sites on the edge of or outwith settlements and give priority to the reuse of previously developed buildings and land in line with TAYplan Policy 1. In this respect sites within settlement boundaries including the site at Hillhead, Cortachy Road and Sunnyside within the existing Kirriemuir development boundary along with a range of other windfall sites have potential to deliver housing over the plan period which is sufficient to meet the TAYplan requirements for the West Angus HMA. The approach of consolidating and prioritising development on sites within the existing development boundary in Kirriemuir also enables the focus of development within the West Angus HMA to be concentrated in Forfar, which is the principal settlement in this housing market area. The preferred option to allow additional housing development on windfall sites will further support a generous supply of housing and provide additional flexibility.

In seeking to maintain an effective 7 year supply of housing land the effectiveness of sites identified for housing will be monitored through the annual Housing Land Audit. Where necessary to maintain a 7 year effective housing land supply additional housing land will be brought forward where necessary. To allocate land this land at Sunnyside, which would form a third phase of development and which is outwith the development boundary would not be consistent with TAYplan Policy 1 and would potentially undermine development of existing sites.

Recommendation:

The future housing land requirement for the West Angus HMA will be considered in drafting the plan.

Chapter 12 – Question 32 Are there any other main issues for the Kirriemuir area that should be considered by the Angus LDP? Please explain your answer.

Main Issue:

Question: 32

Answer: No answer

Representation: 890/013

Organisation: Henry Young (Cairn Timber) Ltd

Agents: Halliday Fraser Munro

Comment:

As a Tier 3 settlement identified in the SDP, the town has a major role to play in achieving the strategic vision for the wider TAYplan area. Kirriemuir has proved to be an attractive location for housebuilding and the MIR identifies that the main issue is delivery of housing land. The continued promotion of this settlement for residential development is supported.

It is critical therefore that the Council take a longer-term view of development within Kirriemuir, ensuring it reaches its development potential and fulfils the strategy and vision as set out in the SDP and MIR to meet the requirements of SPP. Only those sites which are capable of being delivered within specified timescales should be allocated in the Proposed Plan. The deliverability of housing land must be focused on sites which meet the effectiveness test as set out in PAN 2/2010. The LDP is an excellent opportunity for the Council to thoroughly re-assess its housing land supply and provide for alternative locations to meet demand and support the local economy.

Indeed, the MIR itself states that "the main issue for Kirriemuir is to ensure that any new land allocations have the best possible chance of coming forward in the current economic climate."

Allocations K (b) and K3 have failed to complete development over a long period of time, therefore indicating that strong constraints exist on both sites. In ensuring a 5-year effective land supply, the deliverability of these sites should be re-assessed and both moved to a later Plan period. As detailed above, both sites were previously considered effective and both included in the Council's housing land calculations. The development of K3 is dependent on K(b) for access, a constraint which has yet to be resolved. Considering the obvious failure in both of these sites to deliver in their prescribed timescales, alternative sites must be identified to make good this housing land shortfall and meet the Council's housing land requirement for the next phase of the Plan.

Land to the north of Cortachy Road is capable of meeting this short/medium term housing land shortfall in Kirriemuir. It is in a sustainable location with good linkages to the town, surrounding paths and networks. It is identified as an Alternative Option 2, and part occupied by redundant buildings could be regarded as a brownfield site; the principle of development has already been established in this location. It is also contained by strong defensible boundaries and has housing development to the south and west.

Response:

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. Additional land allocations identified in the Proposed ALDP will augment the existing supply of housing land on sites with planning permission and those which are currently under development. In relation to the specific comments in relation to land at Sunnyside, these sites have planning permission sites and are now considered to be under construction. Therefore these sites along with others including Hillhead and Cortachy Road along with a range of other windfall sites within the existing Kirriemuir development boundary have potential to deliver housing over the plan period which is sufficient to meet the TAYplan requirements.

In seeking to maintain an effective 7 year supply of housing land the effectiveness of sites identified for housing will continue to be monitored through the annual Housing Land Audit. Where necessary to maintain a 7 year effective housing land supply additional housing land will be brought forward where necessary. To allocate this land north of Cortachy Road which is outwith the development boundary would not be consistent with TAYplan Policy 1 and would potentially undermine development of existing sites.

Recommendation:

The future housing land requirement for the West Angus HMA will be considered in drafting the plan.

Main Issue:

Question: 32

Answer: No answer

Representation: 798/032

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Scottish Natural Heritage recommend mention of the River Tay SAC, River South Esk SAC and Loch of Kinnordy SPA which may be affected by proposed development.

Response:

Comments noted. The Proposed ALDP policy framework and land allocations will be informed by a Strategic Environmental Assessment as required under the Environmental Assessment (Scotland) Act 2005 and a Habitat Regulations Appraisal as required under the Conservation (Natural Habitats & c) Regulations 1994. These documents will assess development impacts on the Special Areas of Conservation (SAC's).

Recommendation:

Detail to be considered in drafting plan.

Main Issue:

Question: 32

Answer: No answer

Representation: 893/017

Organisation: Delson Contracts Ltd

Agents: Emac Planning LLP

Comment:

Delson Contracts Ltd agree with the general strategy for the LDP which seeks to guide the majority of new housing and employment development to locations within the principal settlements that have the capacity to accommodate new development integrated with transport infrastructure. We support the identification of Kirriemuir as an appropriate settlement for growth, which reflects the requirements of the TAYplan SDP, 2012.

Delson Contracts Ltd agree that the following key issues, identified in the MIR, are relevant to the future growth of Kirriemuir:

- Kirriemuir lies at the 'gateway' to the Angus glens, providing a range of services and facilities for the town and for other communities in the rural area.
- Growth has predominantly taken place in recent years at Northmuir, despite the economic downturn. The economic downturn has had an adverse impact on the rate of new housing building.
- It is noted that the two housing land allocations for around 80 homes at Lindsay Street and Sunnyside have not come forward as expected and this highlights ongoing concerns on effective and deliverable sites.
- It is an issue that as at April 2011 and across the town, some 167 new homes remained to be built on a range of brownfield and greenfield sites.

- It is unclear when a new supermarket might be developed on either of the two sites that have been granted planning permission.
- There are some concerns over the number of vacant shops relative to the overall number of retail units in the Town Centre.
- There is potential for increasing path and habitat linkages to/from existing recreational resources, and in some cases providing new areas of green space that could be connected to them.
- There are no issues with primary or secondary school capacity affecting new development in Kirriemuir.
- Scottish Water is undertaking a project to improve the local waste water treatment works, which is likely to increase drainage capacity for new development.
- Development viability will continue to be very important and new sites should be free of constraints relating to infrastructure, or there should be firm commitments to removing any constraints.

Delson Contracts Ltd agree that "One of the main issues for Kirriemuir will be to ensure that any new land allocations have the best possible chance of coming forward in the current economic climate."

Delson Contracts Ltd also consider the further following issues are relevant to Kirriemuir and the emerging LDP and in addition to the above issues would support the allocation of land at East Muirhead of Logie for mixed use development in the LDP:

- The Housing Land Requirement should be more generous and this would justify the identification of further housing land in the first 5-year period of the LDP.
- The Housing Land Supply is currently insufficient and will decrease further before the LDP is adopted and this would justify the identification of further housing land in the first 5-year period of the LDP.
- There is a requirement for supported housing and other special needs housing in Kirriemuir which should be addressed in the LDP.
- Further employment land should be allocated, as part of a mixed use proposal, on land capable of delivering effective employment land.
- Additional community uses should be encouraged to create sustainable mixed use communities.
- Kirriemuir has the potential to contribute to local tourism objectives due to its "gateway to the glens" location and tourism proposals as part of a mixed use development should be encouraged.
- Kirriemuir has sufficient infrastructure capacity in general terms to deliver new housing and sustainable economic growth.
- Development of land at East Muirhead of Logie can deliver beneficial improvements to the local road network to the south of Kirriemuir and improve connectivity and access.

The following provides for a further explanation of the above key issues:

1) Housing Land Requirement (HLR):

Paragraph 7.3 of the Main Issues Report identifies a housing land requirement of 855 units in West Angus between 2014-2024, which is reduced to a requirement of 250 units, based on effective supply stated in the Housing Land Audit, 2011. As stated above, under questions 3, 4 and 5, it is considered that the HLR is understated and should be increased in order to achieve the effective delivery of housing land in this economically difficult period.

The 'Reasonable Alternative' on Housing Land Allowances 2014-2024 is supported which would require maintaining a corresponding effective supply at all times of 3,041 units, rather than 2,310 (as currently proposed). The contribution of land at East Muirhead of Logie to support the currently required 250 units is supported. This site is capable of delivering effective housing land to meet this requirement and an increase to the HLR (as suggested), would

justify further phases of development at the site coming forward within the first period of the LDP.

2) Housing Land Supply (HLS):

The Angus LDP MIR currently derives the HLS figures from the Housing Land Audit, 2011, however, this has recently been replaced by the 2012 Audit.

Paragraph 2.29 of Topic Paper No 1: Spatial Strategy, on the estimated supply admits that this is currently a 'minimum' figure and one which is likely to change before the LDP is adopted, stating that the supply indicates "... the minimum requirements for new housing land allocations (in terms of the equivalent number of new homes required) that have been estimated for purposes of defining options in the MIR. The actual number of new homes that will require additional housing land allocations cannot be determined at this stage, because the supply of effective housing land will change between 2011 and 2014. Furthermore, these figures have been calculated in terms of the preferred option for housing land. If another option from the Housing Topic Paper is ultimately chosen for the Angus LDP, the requirement for new land allocations would change."

The Housing Land Audit, 2011 indicates that as at 2011 there was an effective supply of 167 units in Kirriemuir up until 2018. The anticipated base date of the Angus LDP is 2014 and at this stage only 65 units would be available. 30 of these units are at site K(b): Lindsay Street and 35 of these units are at site K3: Sunnyside. Both sites are in the ownership of J & J Learmouth and neither sites have been developed to date.

The Housing Land Audit, 2012 indicates that as at 2012 there was an effective supply of 124 units in Kirriemuir up until 2019. The anticipated base date of the Angus LDP is 2014 and at this stage only 71 units would be available. The same two above sites would contribute 65 units to the supply. These sites effectively contributed to the supply required in the Angus Local Plan Review and their effectiveness is queried.

The average annual housing completion rate, in Kirriemuir, over the last 5 years has been 22 units. The current supply is therefore significantly below recent completion rates, and even in a depressed market, a new healthy supply should be directed to Kirriemuir to address the issue of deliverable sites on existing sites and provide for flexibility moving forward.

The only other principal settlement in the HMA favoured by the TAYplan to accommodate the majority of growth is Forfar. However, Forfar already benefits from a healthy supply of 517 units up to 2019 and in view of the dwindling supply of effective housing land in Kirriemuir, further housing land should be favoured at Kirriemuir in preference to Forfar, to address the current issues being faced by Kirriemuir.

Paragraph 7.5 of Topic Paper No 1: Spatial Strategy identifies that "It is the Council's intention to retain existing housing land allocations where these are still considered to be capable of coming forward (in part or as a whole) within the first five years of the Angus LDP (2014-2019)." We consider that these sites should not be identified where they are unlikely to become effective.

However, Delson Contracts Ltd do agree with the approach identified in paragraph 7.6 which states that the "The options typically include far more land than has been calculated as necessary for new development, because it is important to ensure that these options are comprehensive and "future proof". Land at East Muirhead of Logie, is a preferred site and is considered to be 'future proof'. As such its status should be elevated and identified for development within the first 5 year period of the LDP.

Within this context Delson Contracts Ltd consider as stated above that the Housing Land Requirement for the HMA should be increased and a generous supply be provided in order

to provide for sufficient flexibility to ensure the effective delivery of housing. Having regard to the identified issues above, a generous supply should be directed to Kirriemuir in order to address above issues.

It is considered that land at East Muirhead of Logie fulfills the strategy for growth identified in the LDP, the site is deliverable, free from infrastructure constraint and in an optimum land use location to delivery the mixed use land requirements of the Town. The development would not only address existing infrastructure and access issues to the south of the town, but also support Town Centre service provision and other community facilities and services.

Meeting the need for supported housing and other special needs Paragraph 3.59 of Topic Paper No 4:Housing refers to the Angus HNDA (February 2010) which identifies a shortfall in housing for special needs. The paper confirms that the estimated shortfall in Special Needs Housing by end of 2018/19 for the West Angus HMA was 1092-1094 and that much of this shortfall is associated with the housing needs of older people.

Paragraph 3.61 identifies that the Council's Best Value Review of Older People's Services has concluded that supported housing would be an effective alternative to residential care in most cases and that it would offer better outcomes for service users. Paragraph 3.63 expresses a preference in land-use planning terms, for future proposals for new residential homes to be economically self-sustaining (i.e. without general reliance on customers being funded through public finances), "...in order to provide an economically sustainable use of land and therefore contribute to a sustainable settlement strategy."

The paper discusses how such housing should be delivered and expresses concern that the initial LDP awareness raising and consultation exercise (November 2010) has identified only one potential site for a nursing home (Land at East Muirhead of Logie, Kirriemuir (Muirhead Estates Ltd)) and no sites for supported housing, for inclusion in the Angus LDP. For this reason, the Topic Paper concludes that the allocation of housing land to meet special needs is not a realistic option for the Angus LDP Main Issues Report and queries instead whether it would be appropriate to consider these matters via supplementary guidance.

The one potential site for a nursing home, was identified on the site subject to these submissions, that is, land at East Muirhead of Logie, Kirriemuir. Given the acute shortfall in the provision of supported and other special needs housing it is considered that this use should be endorsed on this site through an allocation in the Local Plan for supported housing, as this would be preferred to a care home. The allocation of this site for supported housing in the LDP would not only provide an identified local need, but should also ensure deliverability through a commitment on a site with a willing landowner.

3) Employment Land:

There is a requirement for 31.43 hectares of employment land within the area and the land at East Muirhead of Logie is capable of delivering further employment land as part of a mixed use development. Further employment land is proposed as part of the mixed use development on land immediately adjacent to Site K4. Site K4, to the south of the Forfar Road, was allocated for employment use in the Angus Local Plan Review, 2009 and is currently in the process of being developed. A new roundabout junction has been provided to the north of the site off the Forfar Road and the extension of this employment land offers benefits both in terms of accessibility and also in terms of being properly integrated into both the existing settlement and into the new mixed use development being proposed.

Paragraph 2.34 of Topic Paper No 6: The Economy identifies that there is currently no allocated employment land supply at Kirriemuir as "...new employment sites that were

proposed by the ALPR have yet to come forward." The site has subsequently come forward and is in the process of being delivered. This is significant within this economic climate, and is considered to provide the necessary confidence to allocate further land immediately adjacent on land which can also be effectively delivered in the period of the LDP.

The allocation of further employment land at Kirriemuir would conform with the stated strategy and settlement hierarchy established by TAYplan for economic development which identifies that development should continue to be directed to accessible serviced sites in the main towns. In addition, further employment land would compensate for the uncertainty over the two supermarket proposals coming forward.

4) Community and Tourism Uses:

Paragraph 3.89 of Topic Paper No 5: Community Infrastructure identifies that whilst, since 2004, there have been year-on year population increases a number of services and facilities have closed across the LDP area. This has largely been confined to the rural area and includes rural schools, libraries, local shops, post offices, hotels/pubs and petrol outlets.

As a result, the paper discusses the potential of developing community hubs and it is considered that this proposal which includes for 1 ha of land for community/church use would contribute to this concept and be a valuable community asset as part of a mixed use development, in an accessible location.

The proposed 60 bed hotel offers the opportunity to extend the range of tourism facilities in the town at a 'gateway' location. Not only is this a suitable location, but the hotel would also contribute to employment opportunities in the town. The importance of tourism to the local economy is supported at a national level both within National Planning Framework 2 (NPF2) and also within Scottish planning Policy (SPP).

The Town Centre Health Check Report identifies that Kirriemuir is perceived as a tourist destination due to its "gateway to the glens" location and its fame as the birthplace of J.M. Barrie. It is considered that the new hotel would provide for a new gateway feature into the town as part of the town's role as the "gateway to the glens". The Town Centre Health Check Report (TCHCR) has identified that service uses are viable within the town and it is considered that the proposed development would support existing services. One of the opportunities for Kirriemuir identified in the TCHCR was that whilst investment in tourism in the town centre would be appealing to new retailers, one of the threats was that a preponderance of uses that cater mainly for tourists would limit the appeal of the centre to residents and reduce vitality in the low tourist season. The location of a new hotel on the edge of the town would avoid this threat whilst also delivering many of the associated economic benefits associated with such a use.

5) Infrastructure and Deliverability:

SPP confirms that in relation to the location of new development and specifically housing, the majority of housing land requirements should be met within or adjacent to existing settlements as this will minimise servicing costs, reduce infrastructure pressures (e.g. waste water treatment works) and sustain local schools, shops and services.

Kirriemuir benefits from good infrastructure capacity and accessibility:

- The TCHCR, identified that in terms of accessibility, Kirriemuir appears to be the most well connected of the smaller town centres (i.e. compared to Brechin, Carnoustie & Monifieth).
- There are no issues relating to education capacity.
- Consultation with Scottish Water has confirmed that there are no strategic issues regarding water supply.
- In terms of drainage there are no network restrictions

- The site is contained by footpaths and green infrastructure which can be linked into and enhanced.

There are existing access issues to the south of the town and highway improvements and further links from the east to the west would provide for further connectivity and local infrastructure improvements.

Response:

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. In so doing, the Proposed ALDP is required to consider sites within settlement boundaries before sites on the edge of or outwith settlements and give priority to the reuse of previously developed buildings and land in line with TAYplan Policy 1. In this respect, sites within the existing settlement boundary including land at Hillhead, Cortachy Road and Sunnyside, Kirriemuir which have planning permission and implemented consents in the case of Hillhead and Sunnyside, along with a range of other windfall sites have potential to deliver housing over the plan period which is sufficient to meet the TAYplan requirements for the West Angus HMA. The approach of consolidating and prioritising development on sites within the existing development boundary in Kirriemuir also enables the focus of development within the West Angus HMA to be concentrated in Forfar, which is the principal settlement in this housing market area. The preferred option to allow additional housing development on windfall sites will further support a generous supply of housing and provide additional flexibility.

In seeking to maintain an effective 7 year supply of housing land the effectiveness of sites identified for housing will be monitored through the annual Housing Land Audit. Where necessary to maintain a 7 year effective housing land supply additional housing land will be brought forward where necessary. To allocate land this land at East Muirhead of Logie, which is outwith the development boundary would not be consistent with TAYplan Policy 1 and would potentially undermine development of existing sites.

Since publication of the Main Issues Report, the employment land allocation at East Muirhead of Logie is now being delivered by the private sector. Whilst the comments on a potential extension to this employment land are noted, it would be premature to consider an extension of this land at present. In relation to retail development, whilst planning permission has now lapsed at Gairie Works, planning permission is still live on 3.2ha of land at Pathhead. The Proposed ALDP will take account of this permission.

In terms of Kirriemuir Waste Water Treatment Works, since publication of the Main Issues Report Scottish Water has undertaken a quality project. This work was completed in September 2014 and has resulted in an increase in capacity at the works to approximately 150 housing units.

A detailed policy based on residential development, affordable housing, community facilities, tourism and leisure will be considered in drafting the Proposed Plan.

Recommendation:

Detail to be considered in drafting plan.

Representation: 786/022

Main Issue:

Question: 32

Answer: No answer

Organisation: Guild Homes

Representee: Mark Guild

With some qualifications J&J Learmonth support the view that the future development of Kirriemuir should prioritise new homes and business premises on existing sites within the town as part of the preferred option (MIR Kirriemuir para.14). The housing sites are those existing sites that are declared effective in the Angus Housing Land Audit 2012. This includes J&J Learmonth ALPR site K(b) 38 houses (HLA FKK063), Westfield/Lindsay Street and K3 Sunnyside, 35 houses (HLA FKK089), brought forward through the ALPR process and now benefiting from detailed planning permission.

A start has been made on J&J Learmonth Kb) site, in that the road re-alignment has taken place for the site access road at its junction with Lindsay Street (MIR, Kirriemuir para.2). Angus Council is commencing work on its 5 house site, FKK089a) at the entrance to J&J Learmonth Kb) site and completion of these 5 is intended around April 2013. The infrastructure that Angus Council is putting in place (access road including lighting; foul and surface drainage; gas, electricity and water and telecoms ducting) will allow J&J Learmonth to follow through with the extension of infrastructure and enable a start on house building on Kb) in 2013. Until now, the complex process of negotiating with the Council for a start on all these works, together with the economic downturn, has significantly impacted on the ability of J&J Learmonth to begin developing the site at Westfield/Lindsay Street.

As well as prioritising sites within the town already identified, J&J Learmonth also concur with the view of respondents to the Draft HLA 2012 that land should not be limited to existing sites, rather additional land should be allocated in and around Kirriemuir to allow for a greater range of and choice within the West Angus Housing Market Area (HMA) to facilitate, in particular, the building of new houses beyond 2019. This can still be of a scale in keeping with Kirriemuir's status as a Tayplan Tier 3 principal settlement but supports appropriate use of brownfield sites within the town, should there be any available to come forward. It should be noted that in past Kirriemuir Local Plan reviews, the process identified that there were no substantial brownfield housing sites to come forward.

Therefore, with a large unmet housing demand in West Angus HMA, relying on these may not suffice for the future. The strategy of prioritising existing allocations, bringing forward brownfield sites where they become available and allocating some additional new land supports the SPP and Tayplan's intention to prioritise land release for all principal settlements on a sequential approach basis. Of course these policy statements also rely on determining the most suitable sustainable locations in or around settlements.

Further substantial areas of land could be allocated around Kirriemuir for the future development of new homes and complementary uses, mixed use developments for the period up to 2024 (MIR, Kirriemuir para.15, 16, 17).

Response:

Support for the preferred option is noted.

In terms of comments seeking the allocation of additional land in Kirriemuir, in line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. In so doing, the Proposed ALDP is required to consider sites within settlement boundaries before sites on the edge of or outwith settlements and give priority to the reuse of previously developed buildings and land in line with TAYplan Policy 1. In this respect, sites within the existing settlement boundary including land at Hillhead, Cortachy Road and Sunnyside, Kirriemuir which have planning permission and implemented consents in the case of Hillhead and Sunnyside, along with a range of other windfall sites have potential to deliver housing over the plan period which is sufficient to meet the TAYplan requirements for the West Angus HMA.

The approach of consolidating and prioritising development on sites within the existing development boundary in Kirriemuir also enables the focus of development within the West Angus HMA to be concentrated in Forfar, which is the principal settlement in this housing market area. The preferred option to allow additional housing development on windfall sites will further support a generous supply of housing and provide additional flexibility.

In seeking to maintain an effective 7 year supply of housing land the effectiveness of sites identified for housing will be monitored through the annual Housing Land Audit. Where necessary to maintain a 7 year effective housing land supply additional housing land will be brought forward where necessary. To allocate additional land at Sunnyside, which would form a third phase of development and which is outwith the development boundary would not be consistent with TAYplan Policy 1 and would potentially undermine development of existing sites.

Recommendation:

The future housing land requirement for the West Angus HMA will be considered in drafting the plan.

Main Issue:

Question: 33

Answer: Yes

Representation: 786/023

Organisation: Guild Homes

Representee: Mark Guild

Comment:

Guild Homes promoted a significant development site within Kirriemuir at the time of the ALPR. Since the allocation Guild Homes has worked hard to bring forward the site and indeed the initial land allocation for 120 units at Hillhead has recently been completed. As the MIR notes, it is the only allocated site which has delivered housing. Guild Homes recognises that there are a number of undeveloped allocations, brownfield opportunity sites and infill opportunities within the town boundary which could come forward in the Angus LDP to provide the required residential land within the town. Guild Homes considers that it is essential in order to maximise the opportunities offered by the brownfield, infill and previously allocated sites within the town boundary as a result any further land allocations should be small scale. In the opinion of Guild Homes, should large greenfield releases be made these would detract development from these priority areas within the town boundary. In addition the wider development strategy of Angus Council, which is supported by Guild Homes, focuses the majority of new development towards the main settlements. Within the west Angus housing market area the growth is therefore focused towards Forfar. Again any additional new land allocations within Kirriemuir are liable to deflect development interest from the strategic development sites.

Guild Homes has secured planning consent for a supermarket at Pathhead and are keen to develop the site. Should the supermarket be developed at this site it is considered that a new use will be required to be found for the former Gairie Works site. As the MIR notes this would provide an opportunity for a mixed use redevelopment in an area close to the town. In the event of the supermarket being developed at Pathhead Guild Homes would seek to engage with the landowners and Angus Council in order to promote a high quality redevelopment of the factory site which will enhance the centre of Kirriemuir.

Response:

Comments noted, included support for the preferred option.

Recommendation:

Noted. Detail to be considered in drafting plan.

Main Issue: 0

Question: 33

Answer: No

Representation: 894/001

Representee: Mr P Fretwell

Comment:

Land adjacent to Caddam Wood (Alternative Option 2) should be excluded from wholesale development due to flooding, its open character and drainage issues.

Response:

Comments noted. This site was not identified as the preferred option for development in Kirriemuir within the Main Issues Report. The site is classified as prime quality agricultural land and is potentially contrary to the TAYplan location priorities and could result in the unnecessary loss of prime quality agricultural land. In addition, this area is relatively remote from town centre facilities and services; although it is quite close to Northmuir Primary School. The Main Issues Report confirms that this option is not favoured and would only be suitable if developing existing and other infill sites is shown to be, or becomes financially unviable.

Recommendation:

Noted.

Chapter 12 – Question 34 Do you agree with the preferred option for the development of land in and around Kirriemuir? Please give reasons for your answer and (if appropriate) describe any alternative option that you would prefer.

Main Issue:

Question: 34

Answer: Yes

Representation: 798/034

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Kirriemuir preferred option:

Subject to the findings of the HRA:

- Loch of Kinnordy SPA - screen in for consideration of likely significant effect in relation to qualifying geese interests and their feeding/resting places.

- River Tay SAC - screen in for consideration of likely significant effect as tributaries flow through Kirriemuir to the Tay SAC

- South Esk SAC – screen in for likely significant effects as tributaries flow from Kirriemuir to this site.

SSSIs: Loch of Kinnordy SSSI, Forest Muir SSSI:

There are unlikely to be any direct or indirect impacts to these sites from the preferred development option.

Landscape and visual effects:

Scottish Natural Heritage agree with the preferred option that small-scale infill sites are preferable.

Comments on alternative options:

Screen in for consideration of likely significant effects on Natura sites as detailed for preferred site.

Alternative option 1:

The sites are located on south facing sloping landform with potential for significant landscape and visual impacts on settlement setting and on approaches to Kirriemuir from south to east and west.

Alternative option 2:

This is adjacent to Caddam Wood to the north and west of the site, listed in the AWI inventory as long established (of plantation origin) and part of an extensive woodland network to the north of the

settlement. This is a relatively flat landform with strong landscape and visual containment and the setting offers potential for development. However, the site is remote from main settlement core.

Alternative option 3:

East site - potential for significant impacts on Kirriemuir Den;

South site - remote from main core and visually prominent site to south;

West site - potential for some development, but care needed to maintain and reinforce the settlement edge.

Response:

Support for the preferred option is noted.

The Proposed ALDP policy framework and land allocations will be informed by a Strategic Environmental Assessment as required under the Environmental Assessment (Scotland) Act 2005 and a Habitat Regulations Appraisal as required under the Conservation (Natural Habitats & c) Regulations 1994. These documents will assess development impacts on the Special Areas of Conservation (SAC's).

Recommendation:

Detail to be considered in drafting plan.

Main Issue:

Question: 34

Answer: Yes

Representation: 786/024

Organisation: Guild Homes

Representee: Mark Guild

Comment:

Guild Homes supports the limited release of land within Kirriemuir, that being land at Hillhead, Northmuir and Tillyloss/Newton Park. These sites are all of a reasonable scale and, when considered together along with existing allocated, brownfield and infill site within the town boundary, provide more than sufficient residential land allocation for Kirriemuir for the period of the Angus LDP. Further it is submitted that these infill, brownfield and existing allocated sites provide a variety of sites providing choice and competition within the Kirriemuir housing market. Further as all these sites are located within the established town boundary their allocation will not detract from the principal focus of consolidating Kirriemuir. Further, as the sites are all within the identified development boundary of Kirriemuir. The sites are well placed to provide links with the existing paths networks and are all located within close proximity to the existing services. The land is being promoted by willing developers and all sites are fully effective.

With regard to the possible alternatives, the land at Pathhead has an extant consent for a retail development. Guild Homes are keen to develop this land and therefore it is hoped that this land will be utilised for this use and therefore will not be available for residential development.

In terms of Beechwood Place, the site is out with the development boundary of Kirriemuir, at the time of the previous enquiry the Reporter concluded that the land at Beechwood Place has little in the way of containment and confirmed that in his opinion the site "would have a high level of local visual impact". He concluded that any extension of Kirriemuir to the south would be "detrimental to the landscape setting of Kirriemuir".

In terms of the landscape capacity of Kirriemuir nothing has changed and therefore it is fair to conclude that this opinion is still valid and the land should not be allocated for development.

In considering the site at Cortachy Road, Guild Homes are of the opinion that this is a contained site with high quality landscaping to the north. The site includes an area of brownfield land which should be included for redevelopment or included within the development boundary as it is currently an eyesore. The land is well placed in terms of accessibility and provides the opportunity for small scale development if considered necessary. If any land is released out with the existing town boundary the land at Crawford park is considered most appropriate due to its substantial brownfield nature.

In terms of option 3, land at Herdhill and Sunnyside. Considering land at Herdhill, the Angus Landscape Capacity Study 2003 confirmed that development on this area would be unsuitable in terms of the existing settlement pattern. The land is highly visible from the wider area.

With regard to the extension of the existing allocation at Sunnyside, as confirmed within the Main Issues Report there has been no development of the existing allocations during the current local plan period in spite of the promises made by the landowner at the time of the previous ALPR Inquiry. There is currently an 80 unit allocation at Sunnyside, to allocate further land to the same landowner/developer has the potential to restrict further development elsewhere in the town.

Response:

that the support for this option would better assist in the economic recovery of the Kirriemuir housing market and provide greater scope to meet the housing needs of the area.

Taking the above into account it is submitted that the Preferred Option for housing allocations in Kirriemuir ought to be extended to include additional sites, including Site 23W and 59W. Site 23W Land at North Mains (Richard Lawson) is already supported by the Council in Alternative Option 3. It is submitted that Site 59W ought to be considered on a similar basis as 23W and both sites ought to be allocated for additional housing land in order to compensate for the potential failure of some sites to deliver new units within five years of adoption of the LDP.

We would express concern with regard to the particular grouping of sites within the Alternative Options particularly where the combination of sites includes a site which is particularly unsuitable for development for a number of reasons and bears no comparison with the development potential and low impact of another site. In this regard it is submitted that Site 23W ought not to be considered alongside the area of land on the south side of Brechin Road, to the east of the settlement boundary; that site is particularly prominent in the landscape and raises a number of sustainability issues, part of the land was also the subject of a planning appeal refusal in 2004.

We would also express concern that Site 59W Logie was excluded from any Reasonable Alternative and its Site Assessment Report is presented, without clear justification, to fail all the assessment considerations despite it lying adjacent to Site 23W which received a fully positive assessment. It is submitted that Site 59W Logie ought to be considered in a positive manner on the same basis as the Assessment of Site 23W.

Site 59W Logie, owned by Mr W Stewart, ought to be supported by the Council and brought forward for development at the base date of the LDP for the following reasons:

* Site 59W would effectively contribute to the diverse range and choice of housing sites in the area. The site is not controlled by the major house builder in the area and could be developed either in conjunction with Site 23W or separately with access via North Mains Road. The relatively small size of the site would enhance the diversity of sites in the area and would offer scope for individually serviced plots to be made available thereby positively contributing to the varied housing needs of the area. This option is unlikely to feature on the preferred options housing sites which, it is understood, are controlled by a single developer. My client has been approached by a number of local residents expressing an interest in developing individual plots to provide their new family home(s).

* Site 59W comprises a sustainable site close to schools and services.

* Site 59W together with Site 23W adjoins the settlement boundary of Kirriemuir and accord with the objectives and location priorities of the TAYplan 2012.

* Site 59W (and Site 23W) accords with the preferred strategy for settlements in the rural area of the Angus Main Issues Report.

* Site 59W (with or without Site 23W) ought to form part of a Reasonable Alternative Option and incorporated within the Preferred Option in the Main Issues Report.

* Site 59W could be incorporated into the Preferred Option housing allocations with or without Site 23W. Site 59W could form an extension to the existing settlement boundary linked by the existing track of North Mains Road. The inclusion of Site 59W without Site 23W would avoid the Council's concerns regarding the lack of development at Sunnyside during the current plan period and the lack of commencement of development on the nearby site,

planning permission. There are matters outstanding relating to a legal agreement to planning obligations, for a road bond and the provision of a £500,000 Town Centre Improvement Fund. The site found no favour with the Reporter at the ALPR PLI as the site lies outwith the settlement boundary, which does not require to be strengthened, would be prominent and would encroach on Maryton.

A previous supermarket application at this location failed as it did not meet the sequential test. Development at this location is contrary to the current development plan and the supermarket cannot be brought forward, unless it is granted planning permission. It seems unrealistic therefore to allocate housing land at this location on the off-chance a supermarket may be built adjacent, when there is no guarantee that this will occur.

East Muirhead Employment land has been slow coming forward and it seems unwise to allocate tracts of land for housing south of Beechwood Place or at Pathhead, which specifically relate to either a possible large employment site or a possible supermarket site. This is especially the case where prime agricultural land is involved.

Alternative Option 2

J&J Learmonth consider that the Option 2 land is located considerably beyond the desirable 1km outer circle walk limit to main town centre facilities. That the disadvantages set out in SEA Implications for this area, concerning co-location of housing and employment land and reduced accessibility to services and facilities and use of prime quality agricultural land, should override and rule this area out from option consideration, or at least make it the least favoured of the alternative options. In addition the area forms an effective and attractive transition between suburban development and the rural aspect of Caddam Wood and the road to Cortachy and Glen Clova. This is in effect an exit from the Gateway to the Glens into the Angus Glens proper.

Alternative Option 3

J&J Learmonth generally supports Alternative Option 3 for new land allocations. It is agreed that the area south of Brechin Road would be unsuitable by reason of being more remote from the town centre facilities. This site lies outwith the existing development boundary and forms part of the attractive Brechin Road approach to Kirriemuir from the east. It does not appear to have been put forward as an Initial Awareness site by a landowner or as a late submission site and there does not appear to be a Submitted Site Assessment available for this site.

However the alternative sites to the south-west of the town can readily be linked into the roads infrastructure, that is now started, which will serve sites Kb) Westfield/Lindsay Street, site K3 Sunnyside. As stated at para.39, new linkages to core paths at the periphery of the town can be created, as they will be for sites Kb) and K3. Sunnyside Phase 3 (18W) would form a natural extension to those two sites in the future and should further land be required Land South of Sunnyside (19W) and Land at North Mains (23W) are likely to be offered by the landowners. All these sites accord with the priorities of the Tayplan and are part of a reasonable alternative option included in the Angus Main Issues Report. This area has been tested through the Landscape Capacity Study (2003) and found to be suitable in terms of the existing settlement pattern. This area is considered by J&J Learmonth still, to be the best area to place additional housing land allocations for the later plan period. There are distinct economies of scale to be achieved and, once the recovery from the economic downturn starts, it is likely that other developers will consider this area to be highly attractive.

With East Muirhead of Logie, K4 Forfar Road, employment site appearing to be slow to be taken up for employment uses, there are other areas, which could contribute to some of the need for employment land around Kirriemuir. Not necessarily on a large scale, but related to

This option is preferred and includes the site subject to these representations, together with the land recently granted planning permission to the northeast for retail.

The Development Concept Framework submitted with this submission justifies the identification of this land for future development in both design and planning terms, together with this submission on the MIR.

In support of the elevation of the site to a Preferred Option, it is noted that the MIR analysis provides some very positive comments on the site, including:

- * These areas of ground could feasibly accommodate new homes and complementary uses, including new paths and habitat linkages, without detriment to the landscape and visual setting of Kirriemuir.
- * The development of new homes to the south of Beechwood Place could be acceptably accommodated in terms of the existing settlement pattern and would offer the opportunity for improved access to the countryside from southern parts of the town.
- * Land at this location would be relatively close to existing primary and secondary schools.
- * The development of a supermarket on land that is covered by this option would enable new homes to be developed within walking distance of new shopping provision, whilst there is potential for good road access from areas to the south of Kirriemuir.
- * There are no statutory built, archaeological or natural heritage designations that would prevent new development at these locations.
- * The land areas that are known to be at a high risk of flooding.
- * The indications are that the development of new homes would be viable at this location.

The MIR concludes that the site is not a priority as preference should be given to potential development sites within the existing built-up area, the proposal would result in the loss of prime quality agricultural land is taken into consideration. However, the MIR acknowledges that the site would be favoured if the preferred option of developing existing and other infill sites is shown to be, or becomes financially unviable. As stated above, we have concerns over the deliverability of existing sites and the suitability of the two proposed Greenfield options.

Alternative Option 2: (Cortachy Rd North):

This site is located in Northmuir, which has benefited from recent growth over the last 5 years unlike Southmuir, where East Muirhead of Logie is located. Extension of Kirriemuir further north would result in development more remove from the Town Centre and related service provision. Land at East Muirhead of Logie should be preferred on grounds of existing connectivity to the town centre and the ability to improve connectivity to the south of the town.

Alternative Option 3: (Kirriemuir East, West & South West) It is agreed that these sites are unlikely to deliver development in the period required by the LDP on the basis that "other existing housing land allocations in this area of Kirriemuir have not been developed in accordance with expected timescales, and because the same landowner is likely to be involved in bringing forward the majority of these sites, there is a risk that the capacity to deliver new homes in Kirriemuir could be restricted by the individual circumstances of a single development interest."

In addition:

- * The Angus Landscape Capacity Study (2003) suggests that the two sites to the northeast and west would generally be unsuitable in terms of the existing settlement pattern, or would dilute strong edges to the urban area.
- * All of these locations include areas of prime quality agricultural land.
- * Development to the southwest may require access off sites yet undeveloped.
- * The option areas are relatively remote from town centre shops and services.

Conclusion:

In conclusion, for the reasons demonstrated in response to the questions to the MIR, it is considered that:

- * The Housing Land Requirement should be increased and therefore additional land is required.
- * The Housing Land Supply is insufficient to meet the needs of the HMA and will diminish further before the LDP is adopted and therefore additional land is required.
- * There is a requirement to identify effective and deliverable land, in accordance with national, strategic and local planning policy objectives.
- * Land at East Muirhead of Logie should be elevated to the 'Preferred option' for the future growth of Kirriemuir as the site is in a good planning location and is capable of delivering the growth required in accordance with the land use requirements of the LDP.

Representation: 890/012

Organisation: Henry Young (Cairn Timber) Ltd

Agents: Halliday Fraser Munro

Comment:

Henry Young (Cairn Timber) Ltd do not agree with the Preferred Option. Purely to "retain the housing land allocations from the current local plan and to identify small-scale infill sites at Northmuir and Tillyloss within the current development boundary to provide further new housing development over the LDP period." (Paragraph 24) This is not an approach which will support the strategy to provide for a generous supply of housing land on sites which are capable of delivery.

As identified earlier, there are at least two sites in Kirriemuir which have been allocated for housing purposes for a considerable period of time but have not delivered. Henry Young (Cairn Timber) Ltd would also disagree that 80 houses constitutes 'significant development' for this settlement.

Longer term - beyond 2017 – the Council have identified that additional housing land will be required for housebuilding in Kirriemuir (Paragraph 23).

In assessing the alternatives, strong support is given to Alternative Option 2, Land at Cortachy Road North. The Council have correctly noted that:

- * The site is relatively self-contained in landscape and visual terms with significant woodland to the north providing a strong defensible boundary;
- * Development in this location could also increase accessibility to Caddam Wood and link with the various core paths which transect the site (path 260, 261, 262, 263) in support of the Council's support of green networks;
- * There are no statutory built, archaeological or natural heritage designations;
- * There are no identified infrastructure constraints;
- * Northmuir Primary School is in close proximity;

In addition:

- * Any future development could be sensitively designed to respect the overall pattern and design of development in the area. The site adjoins residential development to the west and the built up area to the south;
- * It could be developed over a longer time-scale and allow for some element of mixed use as promoted by the Council's strategy;
 - A transition between urban and rural landscapes could be achieved with the input of a landscape architect and architectural designs which echo the principles of Designing Streets and Designing Places;
 - Contrary to the Council's conclusion it is not accepted that the site is 'relatively remote' from the town's services and facilities – it is circa 1.4km from the town centre, with various bus routes running throughout the town and more specifically, several stops along Cortachy Road to the south of the site and Golf Road to the east;

- The MIR acknowledges that school capacity is not a constraint to development in Kirriemuir;
- While the land may be classified as prime quality agricultural land, it is in part brownfield containing an abandoned sawmill. It is also only used for rough grazing purposes.

Response:

Comments noted. In terms of the alternative options the reasons why these are identified as reasonable alternatives but not the preferred option are set out in the Main Issues Report.

In terms of future housing land, in line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. In so doing, the Proposed ALDP is required to consider sites within settlement boundaries before sites on the edge of or outwith settlements and give priority to the reuse of previously developed buildings and land in line with TAYplan Policy 1. In this respect, sites within the existing settlement boundary including land at Hillhead, Cortachy Road and Sunnyside, Kirriemuir which have planning permission and implemented consents in the case of Hillhead and Sunnyside, along with a range of other windfall sites have potential to deliver housing over the plan period which is sufficient to meet the TAYplan requirements for the West Angus HMA. The approach of consolidating and prioritising development on sites within the existing development boundary in Kirriemuir also enables the focus of development within the West Angus HMA to be concentrated in Forfar which is the principal settlement in this housing market area. The preferred option to allow additional housing development on windfall sites will further support a generous supply of housing and provide additional flexibility.

In seeking to maintain an effective 7 year supply of housing land the effectiveness of sites identified for housing will be monitored through the annual Housing Land Audit. Where necessary to maintain a 7 year effective housing land supply additional housing land will be brought forward where necessary. . To allocate this land at East Muirhead of Logie, which is outwith the development boundary would not be consistent with TAYplan Policy 1 and would potentially undermine development of existing sites.

Since publication of the Main Issues Report, the employment land allocation at East Muirhead of Logie is now being delivered by the private sector and therefore there is no requirement to bring forward any additional new employment land at Kirriemuir, including an extension to the existing site.

In relation to retail development, although planning permission has now lapsed at Gairie Works for this use, planning permission for retail development is still live on 3.2ha of land at Pathhead. The LDP will take account of this permission.

Recommendation:

Detail to be considered in drafting the plan.

Main Issue: 0

Question: 34

Answer: No

Representation: 915/001

Representee: Ronald Silverstone

Comment:

It is noted that Kinnordy Estate has proposed the the field behind my bungalow in Northmuir as a possible site for housing in the future, and I am puzzled by the existing use being designated as "open space" as distinct from "agricultural."

The field is currently ploughed in anticipation presumably for sowing crops or possibly grass to support grazing animals.

Whilst recognising that the consultation period has now passed, I am extremely disappointed that the further erosion of quality agricultural land in Northmuir is deemed acceptable.

This will compound the pervasive encroachment of large scale housing developments which have been sanctioned by Angus Council over the last thirty years. This has seen Kirriemuir town centre decline and its' suburbs stretching tentacles into what were previously well balanced rural communities in Westmuir, Northmuir and Maryton.

With the pressures on local authority finances it has also become noticeable that services have become more and more stretched as new demands are placed on them to maintain the increasing network of lighting and roads imposed by the sprawl of housing developments. Quiet country roads have been turned into main commuter routes, as the population of Kirriemuir attempts to travel to and from work each day. Quite apart from the effect on the environment, this will become even less sustainable if more large scale housing developments are sanctioned.

It will take great courage and ingenuity for Angus Council to resist the incessant demands for more housing, both from the construction industry, the government and other interested parties, but that's what councillors are elected to do, in order to safeguard the interests of the local communities it serves.

Response:

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the West Angus Housing Market Area (HMA) as set out in TAYplan SDP. In so doing, the Proposed ALDP is required to consider sites within settlement boundaries before sites on the edge of or outwith settlements and give priority to the reuse of previously developed buildings and land in line with TAYplan Policy 1.

There may be a requirement to improve infrastructure provision to support and enable future development. Where appropriate, the Proposed ALDP site allocation policies and development briefs will specify where infrastructure requirements or improvements are required. Detailed policies based on developer contributions will also be considered in drafting the Proposed Plan.

Recommendation:

Detail to be considered in drafting the plan.

Chapter 13 Monifieth

Chapter 13 – General

Representation: 916/068

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Monifieth Alternative 1

Flood Risk:-

None known at site.

A FRA may need to consider the small watercourse adjacent to the A92.

Representation: 901/009

Organisation: Scottish Water

Representee: Adele Gallagher

Comment:

Bullet Point 1:

Scottish Water suggest that this be re-written as the following “Scottish Water has suggested that a Drainage Impact Assessment would be required for new development to identify potential network issues and minimise any reduction in level of service for existing customers”.

Representation: 916/025

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

In March 2009 there was some damage to the coastline by higher than normal tides.

In September 2009 there was flooding of properties in the Milton Place area from high water levels in the Dighty Water.

Representation: 916/067

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Monifieth Preferred

Flood Risk:-

None known at site.

The extent of the site boundary is uncertain. The Monifieth Burn is on the northern boundary of the indicated area, the flood risk associated with this watercourse has not been fully identified via the Indicative Flood Map as it is smaller than 3km² in this location. The flood risk associated with the Burn, and any stretch that this culverted, would need to be considered but a large area is likely to be available for development.

Water environment:-

Any opportunities for de culverting should be taken.

Response:

Comments noted.

Recommendation:

A Strategic Flood Risk Assessment will be undertaken to support the site selection process in the preparation of the Proposed ALDP. Where appropriate, Drainage Impact Assessments will be required to support development proposals. A policy approach to flooding and drainage including SuDS will be set out in the Proposed ALDP. These representations will be considered in preparing the Proposed Plan.

Representation: 869/001

Organisation: Monifieth Community Council

Representee: Sandy Ritchie

Comment:

The statutory remit of Monifieth Community Council is to ascertain and express the views of the Monifieth community and to that end the Community Council has taken steps to raise awareness of and instigate discussion about the Main Issues Report relative to the future Angus Local Development Plan so far as affecting Monifieth.

The following points have emerged:

- 1) There appear to be mixed views as to the desirability of permitting development of the agricultural land to the north and northeast of the existing town boundaries. In any event the Ashludie Hospital site should have priority. It might be sensible to retain part of the site for future health care.
- 2) Any development will have to take into account the lack of capacity at Monifieth High School and Monifieth Health Centre. Flooding is a problem particularly in the Dighty area.
- 3) Monifieth in particular has a shortage of social housing and affordable homes. Priority should be given to first time buyers and those seeking their first home.
- 4) There is opposition to the disposal and development of existing public open space within Monifieth.
- 5) There is concern as to the future of the town centre which, despite recent improvements, remains economically fragile. The lack of infrastructure means that Monifieth is already "bursting at the seams", yet expansion is needed if the potential for shopping and tourism is to be realised and local employment prospects enhanced. Provision should be made for small industrial units and offices. Future development should aim to sustain a vibrant town centre.
- 6) Future development should take into account the needs identified at recent "M Factor" meetings organised by Local Community Planning. Such needs include a community centre, enhancement of the seafront leisure facilities, a more accessible recycling centre and a cemetery.
- 7) In light of the foregoing points a "masterplan" approach incorporating a town centre strategy seems sensible when dealing with the future development of Monifieth.

Representation: 865/001

Representee: Pat Matchett

Comment:

Would like to make the following general comments in relation to Monifieth:

- The areas at either side of Victoria Street should be used for mixed housing...some private the rest affordable housing and sheltered housing.
- The smaller area (west side) should be started first as it would show residents the type of mixed housing which is planned for a bigger area in the future.
- More important the Ashludie Hospital site should be looked at and the Council should have an option of this ground for their use. As the Health Board is public funded this site should be used for the benefit of the people of Monifieth. The Scottish Government and Angus Council could work together to achieve this. These sites are costly to develop but surely at least half the area should go to Angus Council for future development.

Response:

Comments noted. The Proposed ALDP will allocate land in Monifieth line with the Proposed ALDP strategy. The site assessment process will take account of a range of issues including infrastructure, education capacity, flood risk, drainage capacity, landscape impact, roads and access and the sites availability for development and ability to deliver a mix of housing including affordable housing.

Recommendation:

Comments noted. These representations will be considered in preparing the Proposed Plan.

Representation: 774/008

Organisation: Historic Scotland

Representee: Andrew Stevenson

Comment:

Historic Scotland welcome the comments relating to the continuation in active use of the listed buildings at Ashludie Hospital. Dependant on the extent of growth associated with this option the site and setting of the scheduled monument Ardownie Farm Cottages, souterrains 50m SW of (Index no. 6512) to the north east of the growth area may require consideration.

Response:

Comments noted. The approach to the re-use and / or redevelopment of the Ashludie Hospital site will recognise the building's listed status.

Recommendation:

Comments noted. This representation will be considered in preparing the Proposed Plan.

Representation: 866/001

Organisation: GS Brown Construction

Representee: Neil Smith

Comment:

Land at Crowhill, Monifieth:

Land currently identified in the Angus Local Plan Review as open space. This was done without any consultation between the Council and GS Brown as landowners.

Consideration should be given to identifying the land as being suitable for small scale residential development.

Response:

Comments noted. This site was not submitted as part of the initial awareness raising exercise and was not included as part of the preferred option or any reasonable alternative option in the Main Issues Report.

The approach to delivering and maintaining a five year effective land supply in the 4 Housing Market Areas across Angus will be set out in the Proposed ALDP. The Proposed Plan will allocate sites to meet in full the housing land requirement of TAYplan and additional flexibility will be provided through the policy approach to small and windfall sites, allowing these where appropriate.

Recommendation:

No change.

Chapter 13 – Question 35 Are there any other main issues for the Monifieth area that should be considered by the Angus LDP? Please explain your answer.

Main Issue:

Question: 35

Answer: No answer

Representation: 904/001

Organisation: Dobbies Garden Centres

Agents: GVA

Comment:

These representations are submitted on behalf of Dobbies Garden Centres Ltd in relation to Dobbies Garden Centre / Angus Gateway, Ethiebeaton Park, Monifieth. The location comprises the Angus Gateway retail outlet and visitor centre, the Dobbies Garden Centre (both of which Dobbies' own), a health and fitness centre, fast food restaurant and hotel facilities. The Dobbies owned element employs some 90 full and part time employees.

Due to the location's close proximity to Monifieth, this submission therefore relates principally to Question 35 of the MIR and also Appendix 2.

This location is currently situated within the countryside as defined within the adopted Angus Local Plan Review. The Local Development Plan (LDP) Main Issues Report's (MIRs) Development Strategy identifies nearby Monifieth as a "Principal Town" and the A92 as a "major road" within the local authority area.

This is a well established commercial area, which should be recognised as an important and integral part of the economic functioning of the Angus area. It is considered that the future LDP should acknowledge its existence and recognise its importance. The location should therefore be surrounded by a "Development Boundary" similar to those defined and dealt with via Policy S1: Development Boundaries of the adopted Angus Local Plan Review. Such an approach would provide a degree of flexibility to allow improvements and investment to take place at this location, albeit of a limited scale given the size of the location and the extent of the physical development that has already taken place. It is considered that this approach would comply with the LDP's vision for development in Angus as set out at paragraph 3.1 of the MIR. In particular, there is an opportunity to make the location more attractive and this will assist in improving the overall quality of life in Angus, where people will choose to live, work, visit, invest, as well as creating additional jobs.

The suggested approach is also compliant with Appendix 2 of the MIR and the reference to Policy S1 (page 129). It notes that the preferred approach of the MIR is to continue to advocate the use of development boundaries as an appropriate tool to protect landscape setting and that these will be reviewed to determine capacity for additional development. It states that this may provide scope for further development within boundaries without significant impact on the rural landscape.

Indeed, there is an opportunity to improve the aesthetics of the garden centre / Angus Gateway within the confines of the already developed area for the benefit of both the population of Angus and visitors. Such development would not have an impact on rural landscape, given the well established existing uses and built form at the location. It is considered that the existing development boundary definition is out of date relative to this location and this should be rectified within the LDP to reflect the policy position / treatment of built up areas elsewhere within Angus.

Response:

Comments noted. A network of retail centres will be identified in the Proposed ALDP in accordance with SPP (2014). This will include commercial centres where appropriate. The status of Ethiebeaton Park will be considered in this context. The policy approach to a landscape capacity based review of settlement boundaries will be incorporated into the Proposed ALDP, its Action Programme and any related supplementary guidance.

Recommendation:

Detail to be taken into consideration in the preparation of the Proposed Local Development Plan.

Main Issue:**Question:** 35**Answer:** No answer**Representation:** 849/022**Organisation:** Auchterhouse Community Council**Representee:** Linda Cockram**Comment:**

Why has business development been excluded in Monifieth?

Response:

Comments noted. TAYplan (2012) identifies Monifieth as part of the Tier 1 Settlement of the Dundee Core Area. The settlement does not therefore have a TAYplan employment land allocation in its own right. Consequently, the Main Issues Report (2012) identifies that the preferred option is to identify long-term allocations of employment land in all of the principal settlements, with the exception of Monifieth and Birkhill/Muirhead which are situated within the Dundee Core Area. Within the Dundee Core Area, Dundee City Council propose to identify and safeguard large quantities of employment land within Dundee City.

Recommendation:

No change.

Main Issue:**Question:** 35**Answer:** No answer**Representation:** 798/035**Organisation:** Scottish Natural Heritage**Representee:** Carolyn Deasley**Comment:**

It would be useful to identify the European and nationally important sites of importance which lie to the south of the town – the Firth of Tay and Eden Estuary SAC and SPA respectively, Monifieth Bay SSSI and Barry Links SAC and SSSI to the east, all designated because of their important coastal habitats and species, and the need to consider impacts of new development in relation to their interests.

Scottish Natural Heritage note in paragraph 7 that there are possible network constraints for waste water.

Response:

Comments noted. In line with their statutory duty, Angus Council will undertake Habitats Regulations Appraisal of the Proposed ALDP to ensure no adverse impact from any aspect of the plan on European designated sites. The Proposed ALDP will include policies to protect the natural heritage and biodiversity interests of the area, including statutory designations.

Recommendation:

Comments noted. This representation will be considered in preparing the Proposed Plan.

Main Issue:**Question:** 35**Answer:** No answer**Representation:** 868/017**Organisation:** Barratt East Scotland Limited**Agents:** Ryden LLP**Comment:**

Lack of open space.

Response:

Angus Council will be undertaking an audit of the quantity, quality and accessibility of open space in the Angus towns which will identify existing levels of open space provision and deficiencies at a local level. This will form the basis of an Open Space Strategy which will establish standards for the provision of open space in new development and identify opportunities for improving and extending green networks in and around the Angus towns.

Recommendation:

Comment noted. This representation will be considered in the preparation of the Proposed Plan, Action Programme and associated guidance.

Main Issue:

Question: 35

Answer: No answer

Representation: 867/013

Organisation: Taylor Wimpey

Agents: Montgomery Forgan Associates

Comment:

Taylor Wimpey's own land at The Grange, Monifieth. Previous submissions to the pre MIR stage articulated a residential development of up to 400 units all set within a well defined and robust long term boundary for Monifieth. The 400 units include a 25% affordable housing contribution. It is noted that the MIR identifies The Grange as the preferred alternative option, with the preferred option being Ashludie Hospital and an associated large undefined greenfield release of land which rolls out to the east.

It is submitted that The Grange should be identified as the preferred option for housing development of up to 400 units over the plan period 2014-2024 for the following reasons. The identification of land at Ashludie Hospital/associated greenfield release is suggested by the Council to be a long term option. Indeed, this is projected beyond the LDP period. Given the lack of any development at Ashludie despite the site's inclusion in previous local plans and the unknown deliverability, technical and landscape issues of the wider greenfield land, this longer term frame is not unreasonable. It is therefore questioned why, given TAYplan's requirement to allocate housing land for 10 years, that it indicates that Ashludie is the preferred option for development at Monifieth to be allocated within the LDP for development post 2024.

As such the LDP should not identify land at Ashludie and beyond for development purposes. At the most, the LDP could indicate that post 2024, this would be the intended direction of future growth if required. The Grange, Monifieth is also a more appropriate location for development than Carnoustie given its Tier 1 rather than Tier 3 status; given that in contrast to Carnoustie which is in multiple ownership, land at The Grange is owned by Taylor Wimpey where plans are advanced; and, there is a commitment to include 25% affordable housing. Instead, the preferred alternative at The Grange, with the many benefits set out within the attached supporting statement including the early delivery of both private and affordable housing does what TAYplan requires and can be done in a positive manner.

It is also noted that there is reference within the MIR to a potential site for a park and choose, with Monifieth cited as one of several possible locations. As this is seen as a long term project by TAYplan Action Programme, it is right to note that Ashludie may be a suitable long term location for this. Given this timescale, there is no requirement for The Grange to accommodate such a facility.

Response:

Comments noted. The Local Development Plan requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the Angus LDP MIR is consistent

with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. Proposed land allocations for residential development consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

The Regional Transport Strategy 2008 – 2023 identified requirement for a Park and Ride / Multi Modal Interchange Facility to the east of Dundee at Monifieth. No specific site has been identified. The Proposed ALDP will acknowledge and take into consideration the requirement for these facilities.

Recommendation:

Comments noted. This representation will be considered in the preparation of the Proposed Plan.

Chapter 13 – Question 36 Do you agree with the preferred option for the future development of Monifieth? Please give reasons for your answer and (if appropriate) describe any alternative option that you would prefer.

Main Issue: Question: 36 Answer: No

Representation: 904/002

Organisation: Dobbies Garden Centre

Agents: GVA

Comment:

See response to Question 35.

Representation: 867/011

Organisation: Taylor Wimpey

Agents: Montgomery Forgan Associates

Comment:

Please see response to Question 35.

Response:

Comments noted (please refer to the response for Question 35).

Recommendation:

Noted.

Main Issue: Question: 36 Answer: Yes

Representation: 798/036

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Scottish Natural Heritage support the masterplanning approach to new development and the development of brownfield land in Monifieth (Ashludie Hospital) in preference to greenfield sites.

Response:

Comments noted.

Recommendation:

Noted.

Main Issue: Question: 36 Answer: Yes

Representation: 868/018

Organisation: Barratt East Scotland Limited

Agents: Ryden LLP

Main Issue: Question: 36 Answer: Yes

Representation: 842/006

Organisation: NHS Tayside

Agents: Scottish Futures Trust

Comment:

A masterplanned approach to the expansion of Monifieth that establishes a long term vision for the future growth of the town is the correct approach. NHS Tayside also welcomes the statement that the redevelopment of Ashludie Hospital should be prioritised in view of the TAYplan policy on urban brownfield sites (see Policy 1 Location Priorities). However, NHS Tayside would prefer that a masterplan for the Ashludie Hospital site be drawn up

independently of a masterplan for the wider expansion area to the north of Monifieth. NHS Tayside does not wish to see the LDP require a single masterplan for the long term expansion of the Greenfield land to the north of the site and the hospital site itself. Ashludie Hospital is a relatively self contained site that is located within the settlement boundary of Monifieth. It is a brownfield site. Substantial areas of the site have already accommodated housing development. The principle of developing housing at this location has already been established as has the effectiveness of the site. As Policy 1 of TAYplan makes clear, the development of such sites should be prioritised before Greenfield development.

It is NHS Tayside's view that the potential Greenfield housing allocation to the north of Ashludie is a large site that will require a significant level of design work and further technical investigation. Its development will also have a greater impact on local services and infrastructure. Assessing and mitigating these impacts may take time.

In order to avoid potential unnecessary delays to the promotion of Ashludie Hospital for redevelopment NHS Tayside will resist any requirement to jointly masterplan the sites.

It is recognised that any masterplan for the Ashludie Hospital site will need to be cognisant of potential development to the north and may need to facilitate linkages with this area. However, the unique characteristics of the hospital grounds, e.g. the presence of listed buildings and Tree Preservation Orders, indicate that a separate focussed masterplan or development brief for Ashludie should be undertaken. NHS Tayside has commenced this process, through Scottish Futures Trust, and would expect this development opportunity to come forward in advance of the expansion area to the north of Monifieth and the adopted LDP.

Response:

Comments and support noted. The Local Development Plan requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the Angus LDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. Proposed land allocations for residential development consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

The Ashludie Hospital site is a brownfield site within the extant Development Boundary. Angus Council will continue to work with NHS Tayside and Scottish Futures Trust to facilitate re-use and regeneration of the site.

Recommendation:

Comment noted. This representation will be considered in preparing the Proposed Plan.

Comment:

Monifieth preferred option:

Subject to the findings of the HRA:

Firth of Tay and Eden Estuary SPA - screen in for likely significant effect on qualifying bird interests.

Landscape and visual effects:

Scottish Natural Heritage support the redevelopment of the hospital site in the preferred option. However, Scottish Natural Heritage recommend the extent of the preferred option is limited to this redevelopment area to mitigate potentially significant landscape and visual impacts. The development proposed is in conflict with the ridgeline (as defined on Map D) which significantly contributes to settlement setting of Monifieth.

Alternative option 1:

HRA: Screen in for consideration of likely significant effects on Firth of Tay and Eden Estuary SPA as above.

Landscape and visual: Development of the western part of the alternative site is possible. The site is contained within the settlement setting as defined by the ridgeline on Map D for the western part of the site. There is an opportunity to improve the prominent intrusive settlement edge and impacts of the adjacent A92 corridor.

Response:

Comments noted. In line with their statutory duty, Angus Council will undertake Habitats Regulations Appraisal of the Proposed ALDP to ensure no adverse impact from any aspect of the plan on European designated sites. The Proposed ALDP will include policies to protect the natural heritage and biodiversity interests of the area, including statutory designations.

Recommendation:

Comments noted. This representation will be considered in preparing the Proposed Plan.

Main Issue:**Question:** 37**Answer:** No**Representation:** 864/001**Representee:** Rory Young**Comment:**

As a resident of Park View (in the grounds of Ashludie hospital) in Monifieth I would be completely opposed to development of greenfield fertile farmland to the east of Victoria Street. This would destroy the sense of country living afforded by living on the edge of Monifieth and could impact negatively on house prices in the area. The suggestion that this site might potentially also accommodate a park and ride facility is a major concern given the impact on air quality and health that may arise from living close to such a facility. Noise pollution and loss of visual amenity would also be concerns. It is unclear why this could not be developed north of the A92 and away from housing. The siting of a new recycling facility on this attractive entry point to the town would also be potentially detrimental to the visual appeal of the area. Victoria Street and Ashludie are attractive residential areas and these development options threaten to drive existing residents away from Monifieth. The reason that many people choose to live in this area is because it has not been subject to insensitive urban sprawl. As noted elsewhere in the report Monifieth town centre has particular weaknesses. Compounding this by destroying the north-eastern access to the town would be environmentally insensitive and is a major cause of concern for residents living in this area. Houses are already taking months if not years to sell and so greenfield development should be the very last resort and should only be considered where there is extremely robust evidence of housing shortages. I do not believe this is the case or likely to be the case in the next decade and raising the spectre of greenfield development, even if most of it would occur post 2024, can only serve to upset residents of the area and drive some to reconsider whether they wish to continue living in the town. With the brownfield Ashludie site flagged up as surplus it would be unacceptable to begin releasing any greenfield land unless demand

begins to seriously outstrip supply. The only winners from these options would be developers and landowners.

Please reconsider this option.

Response:

Comments noted. The Local Development Plan requires to be consistent with the approved TAYplan SDP (June 2012). The spatial strategy put forward in the Angus LDP MIR is consistent with TAYplan and seeks to direct an appropriate level of plan led development within the hierarchy of settlements. Proposed land allocations for residential development consistent in scale and location with the provisions of TAYplan will be detailed in the Proposed ALDP.

Recommendation:

Comment noted. This representation will be considered in preparing the Proposed Plan.

Main Issue:

Question: 37

Answer: Yes

Representation: 868/019

Organisation: Barratt East Scotland Limited

Agents: Ryden LLP

Chapter 14 Montrose

Chapter 14 – General

Representation: 845/009

Representee: Mr D Ogilvie

Agents: Emac Planning LLP

Comment:

It is considered that land to the east of Rossie Mills (which extends to approximately 0.9 hectares) is capable of comfortably accommodating 4 to 6 substantial bespoke houses, within a landscape setting. A low density development is considered appropriate in this location, having regard the characteristics of the settlement and site.

This site would offer further choice and flexibility in the housing land supply and North Angus Housing Market Area.

Response:

The site is located in the open countryside outwith a settlement for growth identified in the preferred spatial strategy. The preferred strategy for the rural area is to focus housing development within the larger rural service centres. Outwith these locations the preferred strategy is to continue the existing approach set out in the Angus Local Plan Review by considering housing proposals in the open countryside against relevant policy. (See Main Issues Report Appendix 2: Table of Future Intentions for Angus Local Plan Review Policies). The detail policy framework for housing in the rural area will be considered in drafting the Proposed Plan. Also see responses to Chapter 3: Vision and Local Development Plan Strategy.

Recommendation:

No Change

Representation: 916/072

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Montrose Preferred Employment (Montrose Airfield)

Flood Risk:- No flood risk apparent. Considering recent storm events the council may wish to consider the issue of erosion during high storm surges and with regard to the Angus Shoreline Management Plan. The Council may wish to consider if they need specialist advice regarding erosion risks at this location to define if it is vulnerable to erosion and if development is appropriate.

Water Environment:- SEPA would welcome the Council exploring the possibility of retrospective SUDS as part of any development at this site.

Response:

Comments noted. Detail in relation to allocation of land at Montrose Airfield including need for appropriate assessments, implications in relation to the Councils Shoreline Management Plan and drainage requirements will be considered in drafting the Proposed Plan.

Recommendation:

No Change. This representation will be considered in preparing proposed Plan.

Representation: 844/021

Organisation: D J Laing

Agents: Emac Planning

Comment:

It is relevant in the preparation of the emerging Angus Local Development Plan that in addition to large strategic land allocations, there requires to be smaller and incrementally appropriate sites which can facilitate limited growth of a scale that fits with the current settlement pattern. Such a site exists on the disused former Service Reservoir, Hospital Road, Montrose. Extending to 0.82 ha. the site was the subject of a 'bid' by D J Laing Homes during the preparation of the Main Issues Report (MIR). Currently redundant, the disused reservoir has significantly degraded and is classified as a brownfield site capable of accommodating 15 houses.

Response:

Comments noted. The site is located outwith but adjacent to the development boundary at Hillside. There is adequate land within the existing Development Boundary to accommodate housing land requirements established by TAYplan Strategic Development Plan. A development boundary review for principal settlements (including Hillside as part of Montrose) will consider anomalies and rationalise the existing boundary alignment if necessary. The timescale for the settlement boundary review will be considered as part of the Proposed ALDP Action Programme. Also see responses to Chapter 3: Vision and Local Development Plan Strategy.

Recommendation:

No change. Settlement boundary review to be considered as part of the Proposed ALDP Action Programme.

Representation: 787/002

Organisation: Sainsbury's Supermarkets Ltd

Agents: Turley Associates

Comment:

Sainsbury's gained planning permission for a new supermarket at the Former Distillery, Brechin Road, Montrose on 21 September 2011. The new store will provide a significant contribution to retail provision on the north side of Montrose and in retaining expenditure within the town.

Given the role and function that the new Sainsbury's store will have as a retail destination, and taking into account the requirement for a clear network of centres, Sainsbury's request that the site is included in the LDP network of centres as a Commercial Centre defining its individual role. Should this not be acceptable, Sainsbury's request that consideration is given to designating the site as a Local Centre.

Response:

Comments noted. Identification of a network of centres as promoted by Scottish Planning Policy will be considered in drafting the Proposed Plan.

Recommendation:

No Change. This representation will be considered in preparing proposed Plan.

Representation: 774/009

Organisation: Historic Scotland

Representee: Andrew Stevenson

Comment:

As the Council are aware, a listing review is currently out to consultation proposing several new additions to the Montrose Royal Mental Hospital (Sunnyside Hospital) listing and Historic Scotland will continue to work with the Council to assist in delivering the sensitive reuse and regeneration of the site.

Representation: 916/069

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Montrose Preferred (Sunnyside Hospital)

Flood Risk:-None Known at site.Uncertain of the location of this area. There does not appear to be a Flood risk to the hospital area.

Response:

Comments noted.

Recommendation:

No Change.

Representation: 916/070

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Montrose Preferred (Brechin Road)

Flood Risk:-None Known at site. This site has planning permission and SEPA commented on this site in 2002, 2003 and 2009. It is understood that phase 1 is under construction but it is unclear if further flood risk information is required for phase 2. A review of the previous FRA to include new legislation and all sources of flooding may be required at a planning application stage for further stages of development here.

Water Environment:- Montrose Basin SSSI - Tayock Burn flows into this - SUDS design would need to take this into consideration. Also note SEPA presumption against culverting for land gain.

Response:

Comments noted. The site at Brechin Road has planning permission. The approved development brief for the site (2004) sets out site specific requirements including requirement for SUDs and Flood Risk Assessment. Planning permission was granted as being in accordance with the approved development brief.

Recommendation:

Comments noted. This representation will be considered in preparing the Proposed Plan.

Representation: 846/001

Representee: Messrs Baillie & Mr Alexander Middleton

Agents: Savills

Comment:

Paragraph 4 of the Montrose Settlement Strategy recognises that the long-standing housing allocation at Brechin Road will continue to have a key role in providing a long-term supply of new homes for Montrose. Messrs Baillie & Mr Alexander Middleton fully support Angus Council's commitment to protect and continue to support the future development of this residential site.

Paragraph 9 details that the existing housing land allocation at Brechin Road (Site M1 in the Angus Local Plan Review) has come forward more slowly than anticipated. Early phases of this site have been developed and Messrs Baillie & Mr Alexander Middleton remain committed to the delivery of this housing site. This commitment has been demonstrated by obtaining planning consent to extend the time period of the outline planning permission. This site remains an effective housing site.

Paragraph 14 recognises that the existing housing land allocation at Brechin Road has planning permission and development is currently progressing on the south east portion of the site. The Council anticipates that developer interest in the remainder of the site will continue as the existing phases near completion and that the site can deliver approximately 293 units. Our clients participated in the consultation process for the Draft Angus Housing Land Audit 2012 and as identified in the Main Issues Report, the site will be capable of forming part of the effective housing land supply for this LDP. We fully agree with Angus Council's statement that this site remains viable in the current economic climate and support the continued allocation of the site.

Response:

Comments noted.

Recommendation:

No Change.

Representation: 916/071

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Montrose Preferred Employment (Forties Road North)

Flood Risk:- None Known at site. No flood risk apparent.

Water Environment:- SEPA would welcome the Council exploring the possibility of retrospective SUDS as part of any development at this site.

Response:

Comments noted. Detailed requirements in relation to allocation of land at Forties Road including drainage requirements will be considered in drafting the Proposed Plan.

Recommendation:

No Change. This representation will be considered in preparing proposed Plan.

Representation: 916/026

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

It is understood that Angus Council may have information on flooding at sites in and around Montrose following events in 2009, The areas include Lighthouse Road, West Terrace and Church Road in Ferryden, the A92 at Upper Dysart, Rossie Braes and Bridge End Garage, the A937 Marykirk to Craigo Road, the A935 at Tayock Cottages and Logie Pert.

Montrose is generally low lying. The lowest areas adjacent to the coast and Montrose Basin may be at risk to coastal flooding. SEPA would also highlight that consideration should be given to the Angus Council Shoreline Management Plan when allocating areas for future development.

Response:

Comments noted. The Proposed ALDP policy framework and land allocations will be informed by a Strategic Flood Risk Assessment as required by Scottish Planning Policy which will ensure development does not take place in areas of flood risk or contribute to flooding elsewhere. Detailed policies based on the flood risk framework and implications of the Councils Shoreline Management Plan in relation to land allocations will be considered in drafting the Proposed Plan.

Recommendation:

Comments noted. These representations will be considered in preparing the proposed Plan.

Representation: 773/001**Main Issue:****Question:** 0**Answer:****Organisation:** Transport Scotland**Representee:** Stewart Turner**Comment:**

The MIR is extensive and clearly explains where the proposed developments for housing, commercial and industrial use could be directed.

From a roads perspective, the A90 trunk road through Angus is dual carriageway with many grade separated and at grade junctions. However, what has not been demonstrated is the potential impact on the strategic transport network, which will include the impact on neighbouring areas. Transport Scotland will take an interest on the impact on the A90 and in particular from the mixed use development at Sunnyside Hospital, Hillside, Montrose on the A90/A937 junction at Laurencekirk.

Response:

Comments Noted. The land allocations in the Proposed ALDP will be informed by a Transport Appraisal as promoted by Transport Scotland. This will assess the proposed major development sites in Angus including Montrose and seek to ensure that development proposals are acceptable, or have the ability to be acceptable in terms of transport and planning before land allocations are made in the Proposed Plan.

Recommendation:

No change. These representations will be considered in preparing the proposed Plan.

that the Angus landscape will change as a result of built development and in line with SPP will seek to accommodate the right development in the right place where it does not have an unacceptable impact on the environment.

Recommendation:

No change

Main Issue:

Question: 38

Answer: No answer

Representation: 798/038

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Scottish Natural Heritage welcome the recognition of the importance of the natural heritage to the character of Montrose. As well as the coastal SSSIs ('St Cyrus and Kinnaber Links' and 'Rickle Craig and Scurdie Ness') there is a small geological site (Dryleys Brick Pit) which lies between Montrose and Hillside. Please note that these designations are not clearly shown on the maps B (page 105) and the SSSIs have been omitted.

South Montrose Strategic Review: To date, Scottish Natural Heritage have provided only initial comments on an early draft of the South Montrose Masterplan.

Given the potential impacts on internationally and nationally protected sites Scottish Natural Heritage would welcome further opportunities to be involved in the developing Masterplan. It is likely that a separate Habitats Regulation Appraisal (HRA) will be required for this plan.

The section of the River South Esk where the outfalls from the Montrose WWTP are located in currently assessed as having "Moderate" status by SEPA. Any increases to the discharge or expansion of the treatment plant which impact on the river characterisation could have knock on impacts to both the River South Esk SAC and Montrose Basin SSSI/SPA/RAMSAR.

Response:

Comments noted. The Proposed ALDP policy framework and land allocations will be informed by a Strategic Environmental Assessment (SEA) and will set out ways to mitigate any significant effects on the environment and will be supported by a Habitat Regulation Appraisal which will ensure that policies and proposals do not have a significant effect on the conservation objectives and qualifying features of Special Areas of Conservation or Special Protection Areas. The matters referred to will be taken into consideration in drafting policies in relation to the coastal zone as well as land allocations.

In terms of South Montrose Strategic Review, the South Montrose Consultancy Study is now complete. Proposals for road realignment are being implemented. Where planning permission was required, consultations statutory bodies and environmental assessments were undertaken as part of the planning application process.

Recommendation:

No change. This representation will be considered in preparing the proposed Plan.

Chapter 14 – Question 39 Do you agree with the preferred option for the future development of Montrose, Ferryden and Hillside? Please give reasons for your answer and (if appropriate) describe any alternative option that you would prefer.

Main Issue:

Question: 39

Answer: No

Representation: 839/001

Representee: Thomas Heshaw

Agents: Bell Ingram

Comment:

1. Introduction

We are commenting on the MIR on behalf of our client who owns land at Hillside, Montrose. Our comments are based on the understanding that no decisions have been made for any of the Main Issues and that these will be made following this stage of the plan making process.

2. Background

Agree that the LDP should allocate a generous supply of housing land in North Angus. It is very important to ensure that enough land is made available on a range of different sites for the development of new homes. The MIR explains that the LDP will need to quantify the size of a 'generous' supply to provide certainty to stakeholders, taking account of windfall sites and housing sites not being deliverable in the desired timescale. The preferred options in the MIR reflect TAYplan which requires that the majority of new development takes place within principle settlements. Montrose is identified as being one of the first choices for future development, this includes the nearby settlements of Ferryden and Hillside. This approach has been successful in the past and focuses development on locations with the associated infrastructure and services. In reaching the preferred options the Council has sought to adhere to the National Planning Policy which requires development plans to have realistic aspirations for what can be achieved over the plan period up to 2024. Realistic account also needs to be taken of the impact of the current economic climate on the delivering some development sites within priority areas.

3. Comments

Agree that as much needs to be done as possible to allow the economic recovery to gather pace over time. We support windfall sites not being included in the housing allocation for North Angus, as they support economic development and the regeneration of settlements in a sustainable way. We would however also seek a more flexible approach to the allocation of housing land in and around Montrose, including Hillside, as a first choice location for new development. The Angus Local Plan Review main housing land allocation in Montrose at Brechin Road has come forward more slowly than anticipated and the opportunity site at Sunnyside Hospital, Hillside has yet to be progressed. The LDP provides the opportunity to review whether these sites should continue to be promoted. The MIR preferred option is to continue to rely on this existing strategy to provide long term development opportunities for economic growth.

However, there must remain a degree of uncertainty over the completion of the Brechin Road site due to the economic climate, albeit the MIR conclusions are for a more positive outlook. Similarly, there is no guarantee of the redevelopment of Sunnyside progressing in the plan period because of the substantial costs associated with redeveloping the hospital estate, which are recognised by the MIR. In addition there is the requirement for a drainage impact assessment to be undertaken because of the potential restrictions in waste water drainage network in the area, which further adds to the uncertainty of larger sites coming forward. We think that to rely on other small sites not allocated in the LDP to meet any shortfall does not provide the degree of certainty required by the community and developers.

Given this high level of uncertainty and the very slow economic recovery, we think more readily serviceable land for housing should be identified in LDP to meet the requirement for a generous supply. Housing land should be identified in the Montrose/Hillside area which could be brought forward in the event that Brechin Road and Sunnyside are not completed within the 10 year plan period.

Thomas Heshaw owns easily accessible and serviceable land within and adjacent to the boundaries of Hillside which could well serve such a purpose in the short, medium or longer terms. We therefore support the alternative option for Montrose of allocating more land for housing development outwith the existing development boundary. We think the past experience of slow development of Brechin Road and the substantial costs associated with Sunnyside means that they should not necessarily be considered as effective housing land at 2014 and other options need to be considered. These are compelling reasons for allocating new sites, whilst still being consistent with TAYplan.

4. Conclusions

We approached the Council prior to this submission with the intention of discussing an alternative option of a settlement planning approach, with local services and amenities provided to meet local needs. This would see Hillside evolve over time incorporating land within the settlement boundary and some extension of the settlement boundary into land which lies north of Dubton Road, shown on the attached site location plan. We believe this to be worthy of due consideration as part of the LDP process whilst it is still at this early stage. This approach would help to provide a generous supply of housing land, with a realistic expectation that it could be delivered within the plan period in a time of slow economic growth, whilst building on existing local infrastructure, services and amenities in accordance with other LDP priorities. Landholdings to the west (south of Manse Road) and south-west (North of Station Cottages) could also offer opportunities for small residential development for the short and medium terms with potential for infill and rounding off the settlement boundary. It is in pursuance of discussions with the Council about alternative options for Montrose/Hillside in the short, medium and long term that we have submitted these comments on the MIR on behalf of our client, who is exploring options for existing and future development potential of land at Hillside.

Representation: 838/012

Organisation: Bon Accord Land Ltd & Stewart Milne Homes

Agents: Ryden LLP

Comment:

Too much emphasis is placed on the allocation of sites within the existing development boundary and on brownfield sites. The Local Development Plan emphasises that it will direct the majority of new development to the principal settlements of Angus. This means that the seven main towns will continue to be the preferred location for the majority of new housing. Paragraph 3.15 goes on to state that due to the relative lack of opportunities for development within the Angus part of the Dundee Core Area, the majority of new development will be directed to Arbroath, Forfar and Montrose. Therefore, Montrose is an important location in providing land to meet housing requirements.

Paragraph 7.5 states that the Council's intention is to retain existing housing allocations where they are still considered to be capable of coming forward within the first five years of the Angus LDP (2014 2019). In addition to this new sites will be required in all housing market areas, with the exception of North Angus. Therefore, no new housing sites will come forward in the LDP period in the Montrose and Ferryden area and all allocations will be on existing sites. Although, in theory, the Council are concentrating significant development in Montrose, in line with their strategy, through the identification of land at Sunnyside Hospital and Brechin Road, it is questionable whether these will be delivered. Additional new greenfield sites should also be identified in this important area, to ensure an appropriate supply of land for housing.

National planning policy requires development plans to have realistic aspirations for what can be achieved over the plan period and this is acknowledged in paragraph 3.24 of the MIR. SPP, paragraph 20 requires planning authorities to monitor development plans which should focus on whether land allocations have proved viable.

The MIR identifies the site at Brechin Road to take all of the housing allocations (293 houses) in the first plan period of 2014-2019 and for Sunnyside Hospital to be identified as a redevelopment opportunity in the period 2019-2024. The MIR acknowledges that the existing allocation at Brechin Road has come forward more slowly than anticipated, and that it is a long standing housing land allocation, however, surprisingly, it still considers that it is capable of providing 293 houses, in the plan period.

The Angus Housing Land Audit, on the other hand, identifies the 293 units as being constrained due to ownership issues. Therefore, it is doubtful whether they can be delivered in the period 2014-2019. The Housing Land Audit also identifies the site at Sunnyside Hospital as constrained due to land ownership and marketability reasons. It is therefore questionable whether it will ever come forward for development. As they are long standing allocations, it is argued that there has been adequate time for them to be developed. SPP paragraph 70 states that the delivery of housing land through the development plan depends on the timely release of allocated sites. There are reasons why these sites have not been completed and to allocate all housing in the area to these sites risks the entire spatial strategy of the Plan.

These sites have not been delivered in previous plan periods. They will also have been counted towards previous housing land requirements and to use these same allocations is double counting and will result in an overall shortfall in housing land supply as they have never been delivered. Existing allocations on brownfield sites can be developed at any time through Local Plan policies and their delivery should be seen as windfall, rather than counting towards the new housing land requirements. A letter from Jim Mackinnon to the Heads of Planning dated 29 October 2010 advises that the deliverability of sites should be reconsidered and Housing Land Audits can be used to achieve this by identifying sites that are no longer effective and highlighting a need to bring forward new sites.

Existing allocations should therefore not be identified to meet the housing land supply within the Angus Local Development Plan. Instead, new allocations which are capable of delivery should be identified. Should these existing allocations fail to deliver again, there would be a shortfall in the land supply and the spatial strategy of the Plan could be prejudiced. This would counter the Authority's strategy of concentrating a significant amount of development in Montrose. It would also fail to capitalise on the major employment development at Montrose Port which can support a large residential allocation. This will miss a substantial opportunity to provide housing close to employment uses and therefore meet the aspirations of sustainable development. Any development which supports the Port Authority and encourages economic development should be supported. The identification of housing land is central to sustainable economic growth and it is therefore important to encourage housing and economic development in tandem.

Encouragement should therefore be given to the identification of significant housing land in Montrose to support the investment being made by the Port Authority. This will help grow the town and support population growth and economic development, thereby ensuring the future success of the town. Such sites should be capable of early delivery, rather than existing allocations which may not come forward.

Further to this, the allocation of one large site does not provide a choice of location. Were Brechin Road to continue to be allocated, all housing would be concentrated to the north of the settlement, with no new development to the south of Montrose. Also, not everyone wants

to live in the centre of town on a brownfield site. Brownfield sites generally lend themselves better to flatted development. Greenfield sites on the edge of settlements could provide family housing with no risk of contamination, while being close to facilities and services in the built up area. Consideration should therefore be given to the allocation of greenfield sites in sustainable locations on the edge of settlements that can make use of existing connections and infrastructure. This could be in addition to the existing allocations in Montrose, if they were considered to be essential to the strategy of the area. To aid economic recovery, sites that are capable of early delivery and have the support of a developer should be brought forward at the earliest opportunity to help stimulate development in the present economic climate which will contribute to meeting the requirement of a growing population.

Land at Usan Road, Ferryden is an ideal location to allocate new residential development. It is located immediately adjacent to the settlement edge and is bound on two sides by existing residential development and on the third by partial development. The remainder of the site is bound by public roads and the railway to the south west. It is therefore well contained by physical features and development would round off this area to the south. It would support Ferryden Primary School which is operating at 50% of capacity. It would therefore make use of existing infrastructure in the area and can be linked to the existing local pedestrian, cycling, public transport and road networks all of which provide good accessibility to the Ferryden area. These networks can readily be expanded and upgraded as necessary and full accessibility by all modes can be delivered without significant infrastructure works. It is close to existing facilities and would be a highly sustainable development.

Adequate waste water provision is available and upgrades to water services can be delivered. Electricity, gas and telecom services are all available adjacent to the site. It is an ideal location for new residential development, which has the backing of a major housebuilder. There are no archaeological, ecological or landscape issues which would constrain development of this site and the suitability of the site for development was confirmed by the TAYPlan Strategic Site Assessment exercise. It highlighted that the only potential constraint as being the consultation zone related to certain uses in the North Harbour area. However, this only impinges on part of the site and does not impose an embargo on development. In fact, there are already a number of intervening residential properties lying closer to the hazardous uses. Correspondence has previously taken place with the Health and Safety Executive and discussions have confirmed that it is unlikely that HSE would not advise against development of this site. The identification of this site would ensure the delivery of residential development in this important area. It would ensure a choice of location for housing in the area and support existing services and facilities, especially the Primary School.

Representation: 841/001

Organisation: Robert Fleming & Co.

Representee: Robert Fleming & Co.

Agents: The Charlton Smith Partnership

Comment:

R Fleming and Co do not agree fully with the preferred option for future development in Montrose.

MIR, Montrose para.14 states for Brechin Road sites... that part of the site is currently being developed for new homes also suggests that it remains viable in the current economic climate.. This means that out of a total Housing Land Supply of 775 houses for the Montrose area (Montrose and Brechin/Montrose HMA Landward, HLA 2012), a total of 366 houses on Brechin Road sites have yet to be delivered and are only being delivered at a very slow rate and 320 of the potential housing land allocation is locked up in a constrained site M4 at Sunnyside, which, with its large number of listed buildings, is potentially very difficult to redevelop (MIR, Montrose para.15). Designated as an Opportunity Site for mixed

development, there is no certainty that Sunnyside will actually come forward for housing development, especially in the current economic climate. That means that 41% of the potential housing land allocation would be locked up in a large ineffective constrained site at Sunnyside and maybe never come forward.

To maintain just the existing strategy for housing (MIR, para.18 Montrose) as the preferred option for the future would mean there is very little other scope for building new houses in the Montrose area as there are only a further 89 units spread over another 8 sites (HLA 2012). It is considered that other sites should have the opportunity to be brought forward in the Angus Local Development Plan.

R Fleming and Co have proposed their 2.1Ha site (20N) at Marykirk Road, Hillside as an alternative option for land allocations. The site can accommodate around 30 houses, or a mix of housing and business premises could be considered, as Hillside has good road links for car and cycle and has a frequent bus service to Montrose where all additional town facilities are located.

The site was assessed in the Council's previous Assessment of Possible Development Areas (2003) and was considered to have well defined boundaries and by its location would consolidate the urban pattern and provide a more balanced gateway to the village. It was considered to be well located in terms of access to Rosemount Primary School and employment uses in the north of Montrose.

The site at Marykirk Road is also available to be brought forward in the short term i.e. 2014 – 2019 and could prove to be an effective site in the years when Sunnyside is most likely to remain a constrained, Opportunity Site. The Submitted Site Assessment for this site, 20N, for the MIR process notes that this site accords with the objectives and location priorities of the TAYplan and existing boundary realignment can be rationalised if necessary.

Response:

In line with the preferred option for housing land supply (Main Issue 1), the Proposed ALDP will allocate land to meet the full housing land requirements for the North Angus Housing Market Area (HMA) set out in TAYplan. In so doing, the Proposed ALDP is required to consider sites within settlement boundaries before sites on the edge of or outwith settlements and give priority to the reuse of previously developed buildings and land particularly listed buildings in line with TAYplan Policy 1. In this respect sites within settlement boundaries including the site at Brechin Road, Montrose, Dubton Farm, Brechin and a range of other sites have potential to deliver housing over the plan period. The preferred option to allow additional housing development on windfall sites will support a generous supply of housing and provide additional flexibility.

The Brechin Road site and Sunnyside Hospital are key components of the existing Local Plan development strategy. Significant investment at Brechin Road has already been put in place, the first two phases of development have been delivered and information suggests the remainder of the site will be developed within the plan period. The reuse of Sunnyside Hospital Estate remains a priority in accordance with TAYplan Policy 1 and continues to provide a mixed use development opportunity. Consultants working on behalf of NHS Tayside are preparing a Development Framework which will assist in marketing the site in 2015 as a redevelopment opportunity. This work seeks to remove some of the uncertainties associated with a site of this nature and represents a significant step in moving the site forward since its closure in 2011. To allocate land outwith the development boundary as proposed when it is considered that sites within the boundary could be delivered would not be consistent with TAYplan Policy 1. In seeking to maintain an effective 7 year supply of housing the effectiveness of sites identified for housing will be monitored through the annual Housing Land Audit and additional housing will be brought forward where necessary. An oversupply of

Organisation: Hillside, Dun & Logie Pert Community Council

Representee: C Russell

Comment:

Hillside Community Council strongly object to industrial development coming out behind the houses on Coronation Way, Montrose.

Angus Council were of the view that there should be a gap between houses and industrial development with a visible green belt and would object to the loss of that green belt between Montrose and Hillside.

Response:

Comments noted. The preferred options in the MIR take into account a landscape and visual analysis of Montrose and the settlements of Hillside and Ferryden that was undertaken as part of the Angus Landscape Study 2003. This study will be reviewed and updated and its findings will be used to inform specific land allocations and any appropriate mitigation measures in the Proposed Plan. The matters raised will be taken into account in any land allocations.

Recommendation:

No Change. This representation will be considered in preparing the proposed Plan.

Main Issue:

Question: 39

Answer: No

Representation: 842/004

Organisation: NHS Tayside

Agents: Scottish Futures Trust

Comment:

NHS Tayside wishes to see Sunnyside Hospital allocated for housing in the initial LDP period of 2014-2019 and not as an Opportunity Site in the LDP period (2019-2024) as proposed in Angus Council's Preferred Option for the MIR.

As the MIR states, a team has recently been appointed by NHS Tayside to take forward a masterplan for the site. This masterplan is being developed in collaboration with Historic Scotland. Subject to agreement by Angus Council, it is proposed that this masterplan be adopted as Supplementary Planning Guidance (SPG) that would sit alongside the LDP. This masterplan would supersede the existing 2002 Development Brief for the site.

A team led by Jones Lang LaSalle (JLL) was appointed to take this masterplan forward in November 2012. It is expected that a masterplan will be finalised in the latter half of 2013. In taking a comprehensive approach to the site, this masterplan will establish the extent of the buildings to be retained and the capacity of the remainder of the site to accommodate new build development that can cross fund existing buildings' retention and conversion. It will also consider the appropriate phasing of the site's development. This masterplan will also consider whether any other uses for the site are required or appropriate and how these could be accommodated.

Historic Scotland has stated they are looking forward to collaborating on this project and that they do not wish to see listed buildings comprising a barrier to development.

The purpose of this masterplan will be to examine how the Sunnyside Hospital estate could become an effective housing site and what design solution is needed to deliver this. As the MIR states, the site is to be marketed with the benefit of this masterplan later in 2013. It would be unhelpful if the LDP was to state that the site could not deliver housing for a further six years, in 2019.

While Sunnyside Hospital has been subject to a development brief since 2002 and an allocation in the Angus Local Plan Review since 2009, the site has been vacant and

available for development for less than a year without the benefit of any site marketing. At this stage, NHS Tayside would ask that no assumptions should be made on the ability of this site to deliver housing until a masterplan has been developed that examines in detail the site's capacity for development and this masterplan has been made available to the market.

It is therefore the wish of NHS Tayside that the Angus LDP states the following:

- Sunnyside Hospital will be allocated as a housing site in the 2014-2019 LDP plan period.
- The final mix of uses within the site will be determined by a comprehensive masterplan which is in the process of being prepared.
- The issue of the retention of buildings is to be addressed through the masterplan along with other issues including open space, landscape and the extent and location of new build development.
- This masterplan is to be agreed with Angus Council and Historic Scotland and is to be adopted by the Council as Supplementary Planning Guidance that will supersede the 2002 Development Brief for the site.

These changes are in line with Policy 1 (Location Priorities) of TAYplan, which states that plans and programmes shall "prioritise land release for all principal settlements using the sequential approach in this Policy; and prioritise within each category, as appropriate, the reuse of previously developed land and buildings (particularly listed buildings)."

Given that Sunnyside Hospital is both a recently vacated brownfield site within a settlement boundary that also accommodates listed buildings, any barriers to this site's delivery in terms of phasing would be resisted on the basis that it does not comply with Policy 1 of TAYplan

Response:

The Preferred option indicates that the reuse of Sunnyside Hospital Estate remains a priority and continues to provide a development opportunity. Given the scale and nature of the site it is considered that the site provides opportunity for a mix of land uses. Whilst this could include a significant number of housing units; identifying the site as a housing allocation in the Proposed Plan would fetter its potential for other uses that could contribute positively to the economy and wellbeing of the area. Work undertaken by consultants to inform a Development Masterplan to assist in site marketing is welcomed as a significant step in moving the site forward. The status and findings of the Masterplan will be taken into account as appropriate in drafting the Proposed Plan. (See also responses to comments on Local Development Plan Spatial Strategy)

Recommendation:

No Change. The status and findings of the Masterplan to be taken into account as appropriate in preparing the proposed Plan.

Chapter 14 – Question 40 Do you agree with the preferred option for the development of land in and around Montrose, Ferryden and Hillside? Please give reasons for your answer and (if appropriate) describe any alternative option that you would prefer.

Main Issue: Question: 40 Answer: Yes

Representation: 798/040

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Montrose, Ferryden and Hillside preferred option:

Subject to the findings of the HRA:

River S Esk SAC – screen in for likely significant effect. The River South Esk flows through the Basin out to sea, but fish migrate through the Basin into the river.

Montrose Basin SPA - screen in for likely significant effect in relation to bird interests. This option has no direct impacts on internationally or nationally designated sites. However, there is a potential for pollution arising from construction activities or increases to surface water and sewage discharges to have indirect impacts on Montrose Basin SSSI/SPA and the South Esk SAC. We also recommend consideration of how the qualifying bird interests use the area around Montrose for feeding and resting, including the potential option sites. The Basin is vulnerable to changes in water quality through pollution and sedimentation which could have negative impacts on qualifying habitats (saltmarsh, transition saltmarsh and mudflat) and impacts on the birds dependent on them. All salmon entering the river system have to pass through the stretch of water where the WWTW outfalls are located. Although there are no spawning beds in this part of the system salmon migration can be affected by high levels of sediment in the water course. Freshwater pearl mussels are not found within the tidal reaches of the South Esk, however they are dependent on young salmon and trout for part of their lifecycle so there may be additional indirect impacts from changes to the salmon population. As this stretch of the River is already characterised as being of "Moderate" quality any further deterioration in water quality could have impacts on the qualifying features (salmon and freshwater pearl mussel).

St. Cyrus and Kinnaber Links SSSI / Dryleys Brick Pits SSSI / Rickle Craig and Scourie Ness SSSI:

There are unlikely to be any direct or indirect impacts to these sites from the preferred development option for Montrose.

Forties Road/Brent Avenue proposed extension of employment land: This appears to include the southern edge of an area of woodland shown on the Ancient Woodland Inventory as of Long-Established Plantation Origin. This should be protected and enhanced. There is an opportunity to improve settlement edge and approaches from north on main A92 and A932. It is important to maintain separation between Montrose and Hillside.

Montrose Airfield site: Any expansion of employment land should be sensitively developed in line with the Angus Shoreline Management Plan, and there is potential to impact on the important coastal resource in this location. The coastal zone including this preferred site currently provides continuity of coastal habitats and will help provide resilience to extreme weather events and other climate change effects. Development of the site towards the coastline will significantly erode into this coastal zone. The Angus Shoreline Management Plan also highlights long term coastal erosion of the zone north of this proposed development, and we recommend further detailed evaluation of both short term and long term effects of developing this area prior to allocation. We note that the summary table for this option (page 108 - climate change) also states that the new employment land could be designed to avoid the erection of new buildings and important infrastructure areas that could be at risk from future coastal erosion. Scottish Natural Heritage refer to paragraph 98 of

Recommendation:

No Change

Main Issue: 0**Question:** 40**Answer:** No**Representation:** 843/002**Organisation:** Hillside, Dun & Logie Pert Community Council**Representee:** C Russell**Comment:**

Hillside Community Council does not agree to the Preferred Option for Employment Land.

Land adjacent to the houses on Coronation Way should be excluded from development, retaining a visible green belt between Montrose and Hillside.

Hillside Community Council agreed with the development of Sunnyside Hospital and consider that this site should be marketed as a top priority as the listed building is already deteriorating.

Response:

Comments noted. The preferred options in the MIR take into account a landscape and visual analysis of Montrose and the settlements of Hillside and Ferryden that was undertaken as part of the Angus Landscape Study 2003. This analysis highlights scope for some development north of Forties Road within well-defined boundaries whilst still retaining a gap between Montrose and Hillside. This study will be reviewed and updated and its findings will be used to inform specific land allocations and any appropriate mitigation measures in the Proposed Plan. The matters raised will be taken into account in any land allocations.

Recommendation:

No Change. This representation will be considered in preparing the proposed Plan.

Main Issue:**Question:** 40**Answer:** Yes**Representation:** 840/005**Organisation:** John Lawrie Group**Agents:** Halliday Fraser Munro**Comment:**

The John Lawrie Group agrees with the preferred option of development land in Montrose, which identifies Montrose North as an opportunity for employment land and is compliant with TAYplan and the existing Angus Local Plan Review (2009).

The MIR recognises the importance of allocating land for future employment opportunities and Montrose North provides this opportunity. Extending the existing commercial development in Montrose to include this site is a natural progression and takes advantage of the road network and core path opportunities, which can be upgraded to serve these new allocations.

Response:

Comments noted.

Recommendation:

No Change

Chapter 15 Edzell

Chapter 15 - General

Representation: 913/002

Representee: Heather Gow

Comment:

Although little mention was made in the Main Issue report of the housing planned and approved at East Mains Farm, this area also suffered flooding in December 2012. In light of the flooding in the very close vicinity of the proposed development it is vital that flood prevention is built into the layout and design to prevent the financial and emotional distress that occurs when a property is flooded. The depth of the water was greater than 40cm and this was some hours after the peak of flooding.

Response:

Following the flooding event in 2012 a flood risk assessment number of measures and interventions have been put in place and are planned by the Council to address flooding in Edzell as per Committee Reports 120/14 and 412/14 approved by Communities Committee. The site at East Mains Farm has planning permission for housing. At the time of the planning application in 2007 no flooding issues were raised by the Councils Roads Service and the application was approved as being consistent with the Councils Development Plan. Matters relating to surface water and road drainage will be considered by Angus Councils Roads Service through the Road Construction Consent process.

Recommendation:

No Change

Representation: 913/001

Representee: Heather Gow

Comment:

That following the flooding that occurred in the village of Edzell in December 2012, the land South of Lethnot Road which had been considered as a possible site for housing be disregarded due the area and depth of water which accumulated in this field.

Representation: 916/074

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Edzell Alternative

Flood Risk:- SEPA have records of flooding from the Whishop Burn in 1985, 2009 and 2012 downstream of the site. A letter with photographs of the 2009 flooding indicating the culvert causes problems at existing properties on Dunlappie Road. In a letter in 2012 Church Street was also affected.

The Council should carefully consider if there is enough land available for the quantity of housing required. The extent of the site boundary is uncertain and difficult to comment. A small watercourse is on the eastern and southern boundary of the indicated area, the flood risk associated with this watercourse has not been fully identified via the Indicative Flood Map as it smaller than 3km² in this location. Historic information shows that part of this area is at risk of flooding. The flood risk associated with the watercourse, and any stretch that is culverted (up and downstream), would need to be considered and avoided. The land would be constrained for flood risk reasons but a larger area to the west is likely to be available for development. It may be that the constraints due to flood risk restrict the number of housing available on this site. An FRA must identify the risk of flooding, avoid those areas and show that flood risk is not increased elsewhere. There may be an opportunity to improve an existing problem of flooding.

Response:

Whilst this site is not the preferred option the comments are noted and will be taken into consideration in preparing the Proposed Plan. The Proposed ALDP policy framework and land allocations will be informed by a Strategic Flood Risk Assessment as required by SPP which will ensure development does not take place in areas of flood risk or contribute to flooding elsewhere. Detailed policies based on the flood risk framework will be considered in drafting the Proposed Plan.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Representation: 916/075**Organisation:** Scottish Environment Protection Agency**Representee:** Alasdair Milne**Comment:**Edzell Employment

Flood Risk:- SEPA have records of flooding from the Whishop Burn in 1985, 2009 and 2012 downstream of the site. A letter with photographs of the 2009 flooding indicating the culvert causes problems at existing properties on Dunlappie Road. In a letter in 2012 Church street was also affected.

It is noted that this site has planning permission for a visitors centre but it is unclear if one of the conditions was to undertake an FRA to prevent it being at risk of flooding or increasing the risk of flooding downstream (as requested by Angus Council Flood Prevention Officer). We would support part of the channel being opened up from a culvert but it needs to be demonstrated that there is no increase risk of flooding downstream. We do not support buildings being placed over any culverted watercourses. If planning permission lapses the local plan needs to indicate where existing risks or requirements to demonstrate the risk of flooding. SEPA Flood Risk have not previously had an opportunity to comment on this site.

Water Environment:- Opportunities for opening up of the culvert on site - see flood risk comments for this site.

Response:

Previous planning permission for a Visitor Centre on the former mart site has lapsed. The Proposed ALDP policy framework and land allocations will be informed by a Strategic Flood Risk Assessment as required by SPP which will ensure development does not take place in areas of flood risk or contribute to flooding elsewhere. Detailed policies based on the flood risk framework will be considered in drafting the Proposed Plan.

Recommendation:

No Change. This representation will be considered in preparing the proposed Plan.

Representation: 916/073**Organisation:** Scottish Environment Protection Agency**Representee:** Alasdair Milne**Comment:**Edzell Preferred

Flood Risk:-None Known at site.The extent of the site boundary is uncertain. The River South Esk is on the northern boundary of the indicated area. The flood risk associated with the River would need to be considered but a large area is likely to be available for development.

Response:

The Proposed ALDP policy framework and land allocations will be informed by a Strategic Flood Risk Assessment as required by SPP which will ensure development does not take place in areas of flood risk or contribute to flooding elsewhere. Detailed policies based on the flood risk framework will be considered in drafting the Proposed Plan.

Recommendation

No Change. This representation will be considered in preparing the proposed Plan.

Representation: 901/010

Organisation: Scottish Water

Representee: Adele Gallagher

Comment:

Scottish Water suggest that the word constraints is replaced with "issues".

Response:

Comments noted.

Recommendation:

No Change.

requires the allocation of additional housing land outwith the existing settlement boundary is endorsed.

As the owner of both the Preferred and Alternative options identified in the MIR, Dalhousie Estates commissioned technical assessments and concept planning work to inform their engagement in the LDP process commencing at the Initial Site Awareness stage. This work concurs with the analysis undertaken by Angus Council in preparation of the MIR (and as summarised in the constraints assessment in paragraphs 6-9 of the MIR), which concludes that the settlement strategy of infill development in addition to the Housing in the Countryside policy framework should be supported by an additional allocation of land for circa. 50 housing units.

The analysis demonstrates both the capacity of the land to the south east of the village which forms the Preferred Option to accommodate residential development, and its ability to connect future development into the village. This supports the technical assessments contained in the MIR (paragraphs 10-12 and accompanying summary Table).

Response:

Support noted.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue: 0

Question: 41

Answer: Yes

Representation: 820/001

Representee: Andrew & Fiona Burnett

Comment:

Whilst we don't feel that Edzell would benefit from 50 additional houses, if they were to be built then the preferred location to the south east of the village would be the most appropriate location.

As illustrated within the Main Issues Report, this preferred site has a substantially lower visual impact on visitors to the village while there appears to be no risk at this site to future flooding. The Main Issues Report highlights the need to plan for any increased future risk of flooding in new housing development and as has been experienced in recent weeks, the alternative site "Edzell West" has experienced significant flooding. The adjacent agricultural land acts as a flood plain to the stream that runs through it and any housing development here would increase the risk of future flooding in the immediate area.

Response:

Comments in relation to the spatial strategy including opportunities for new housing in the four Rural Service Centres are considered under Chapter 3 (Refer to response provided to Local Development Plan Proposed Spatial Strategy. Comments in relation to the preferred and alternative options for Edzell are noted.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue: 0

Question: 41

Answer: Yes

Representation: 903/001

Organisation: Inveresk Community Council

Representee: Judith Gallacher

Comment:

Option 1 – Preferred Option – Land to the southeast of the village in the area of Duriehill.

Whilst there was no direct objection to this option there were various concerns as follows:-

A) Vehicular access would be a problem due to presence of on street parking as summarised in the Main Issues Report. We cannot visualise how the main streets involved, Duriehill Road, Durie Place, Inveriscandye Road and Ramsay Street, could be improved to facilitate access. Would there be a need for another access road to be created and if so where? This is all very dependent on the exact siting of the proposed development which could entail an access road to the south of the arch which could cause traffic problems and further reduce the attractiveness of the approach to the village.

B) There is no mention of the proposed Struan Quarry which was recently granted approval by Angus Council. As we understand it the quarry workings are due to commence in 2 – 3 years time at the north end of the Struan site which is nearest to the proposed 'preferred option'. At the time of the various assessments for the quarry site this Local Development Plan was not discussed and assessments were undertaken with regard to already established properties. Further assessments now need to be undertaken with regards to the impact of noise, dust and lighting from the quarry site on a future development in this area. There is also the likelihood of increased traffic onto the B966 to the south of the village coinciding with the increase in heavy goods vehicles to/from the quarry site.

C) The play park at Duriehill is one of those targeted for removal of play equipment though it is centred in an area of the village with the highest number of primary age children and is a busy play area. This play park needs to be retained if there is to be future development in this area.

Option 2 – Alternative Option – Land to the south of Lethnot Road. There were many objections to this option.

A) The main objection was due to the history of flooding in this area which has become more prevalent in recent years culminating in the atrocious conditions experienced 21-23 December, 2012, leading to the flooding of several properties adjacent to the proposed site, roads made impassable in the direct vicinity and the widespread flooding of the field site itself. This site has been well documented as a flood plain for many years. The Community Council has reported flooding of the Wishop Burn to Angus Council and SEPA on several occasions and householders (some of whom were flooded most recently) have regularly informed the Council of the problems whilst trying to maintain the area and protect their properties. For this reason alone, this land is completely unsuitable for any further housing development in the future. No amount of mitigation techniques could enable this land to be safe from flooding for future development.

B) Vehicular access would also be a problem for any planned development on this site. Lethnot Road narrows as it passes Castle Gardens and bridges the Wishop Burn. There would be difficulties associated with widening this area of road for vehicular access to a proposed 50 new properties. There are also concerns with an increase in vehicular use of the roundabout at the north of the village which is shared by traffic entering the Medical Centre, the Primary School, the proposed new housing at East Mains Farm and regular through traffic.

C) From a purely aesthetic point of view, any new development including the infrastructure of roads and street lighting would impact significantly on the view of the surrounding landscape presently afforded to the many established properties that abound the proposed site. It was considered that this proposed development would be wholly inappropriate in this setting.

Response:

The scale of land available to the east of Edzell provides opportunity for a significant separation distance and landscaped buffer between the wastewater treatment plant and any new development. Whilst the MIR was informed by initial consultation with Angus Council Roads Service, the Proposed Plan will be informed by a Transport Appraisal which will seek to ensure that land allocations are acceptable or have the ability to be acceptable in terms of impacts on strategic as well as local road networks. Detailed matters of design, access, integration with open space areas and landscaping requirements in relation to any land allocation will be considered in preparing the Proposed Plan. The proposed establishment of a sand and gravel quarry and associated processes on land at Struan is located approximately 1.05 km (0.65 miles) south east of Edzell and will be accessed via a separate access road through Edzell Woods approximately 1.6 km (0.99 miles) from the eastern edge of Edzell. Consultation with the Councils Environmental Health Service during the preparation of the MIR confirmed that the distance between the proposed quarry and the preferred option east of Duriehill Road raised no issues in relation to noise and dust. The 1:200 year coastal and fluvial Flood Risk Maps published by SEPA were also used to inform the MIR options which indicated that the two option sites were outwith the medium to high risk of flooding. Whilst the SEPA 1: 200 Flood Risk Maps were the recognised information source of flooding at the time, the SEPA Flood Maps published in 2014 now take account of flooding from a range of sources including watercourse and surface water flooding. Whilst housing to the west of Edzell is not the preferred option the comments are noted and will be taken into account in preparing the Proposed Plan

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue: 0

Question: 41

Answer: No

Representation: 813/001

Organisation:

Representee: Judith Gallacher

Comment:

No new development is necessary in Edzell at this moment. There is already planning in place for new housing at East Mains farm, which if built will possibly bring the school roll up to the maximum capacity and will most likely house commuters.

There is also the planning in place for approx 250 new houses at Edzell Woods with further planning for approx 750 houses being sought. Linked with this is the development just passed for approx 250 houses on Fasque Estate. Although these two sites are in south Aberdeenshire, this is a large number of houses in a relatively small area, the majority of which will house commuters as there is not the local employment available to necessitate that number of new houses.

I also do not agree with the argument that Edzell is unsustainable without new housing, I believe that Edzell is a strong self-sustaining community. If Angus Council is concerned about the regeneration of the economy of Edzell then it would have been more appropriate surely to have encouraged the development of the 'visitor centre' at the former mart site, a golden opportunity missed. In fact, compared to other Angus villages/towns, Edzell has had very little help in the way of sustainability, in that there is no sports centre, swimming pool, and even the library has been done away with yet the village manages to sustain a vibrant community with many activities.

I personally would like to have a third option of 'no further development' to the village. With reference to the preferred option at Duriehill, there is no discussion in the document about the planned quarrying in that area and the effect of noise and dust created by the works. The second option at Lethnot Road is out of the question due to the flooding associated with

this area which has sadly increased with the building of new houses at Castle Gardens on what was the flood plain for the Wishop Burn.

Response:

Comments in relation to the spatial strategy for rural Angus including the preferred option to allocate small scale development sites in the four Rural Service Centres are considered under Chapter 3 (Refer to response provided to Proposed Spatial Strategy). Consultation with Angus Council's Education Service during preparation of the MIR indicates sufficient capacity at Edzell Primary School to accommodate additional housing development and it is understood that the school roll is falling. In terms of the site specific locations, whilst housing west of Lethnot Road is not the preferred option the comments are noted and will be taken into account in preparing the Proposed Plan. The proposed establishment of a sand and gravel quarry and associated processes on land at Struan is located approximately 1.05 km (0.65 miles) south east of Edzell and will be accessed via a separate access road through Edzell Woods approximately 1.6 km (0.99 miles)from the eastern edge of Edzell. Consultation with the Councils Environmental Health Service during the preparation of the MIR confirmed that the distance between the proposed quarry and the preferred option east of Duriehill Road raised no issues in relation to noise and dust. In line with the preferred option for the development of new affordable homes (Main Issue 2) 25% of the new units built in Edzell will require to be for affordable housing.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue: 0 **Question:** 41 **Answer:** No

Representation: 821/001

Representee: Mr David Milne

Representation: 823/001,

Representee: Janet Macfie

Representation: 806/001,

Representee: Derek Cartwright

Representation: 819/001,

Representee: Duncan Stirling

Representation: 831/001,

Representee: Mr Ian Hamilton

Representation: 812/001,

Representee: Mrs Dianne Timony

Representation: 816/001,

Representee: Dr Ian Edwards

Representation: 815/001,

Representee: Paul Thomson

Representation: 814/001,

Representee: Barbara Anderson

Representation: 811/001,

Representee: Brian Waller

Representation: 833/001,
Representee: DW & SA Harrington

Representation: 824/001,
Representee: Jack Macfie

Representation: 825/001,
Representee: Mr & Mrs Goodall

Representation: 826/001,
Representee: Moira Clyne

Representation: 827/001,
Representee: Peter Clyne

Representation: 828/001,
Representee: Mr Ross Clyne

Representation: 818/001,
Representee: Tim & Angela Legge

Representation: 830/001,
Representee: Mr & Mrs Reid

Representation: 832/001,
Representee: Mr & Mrs Hoskin

Representation: 829/001,
Representee: Dr Ross Duff

Representation: 822/001,
Representee: Jennifer Turnbull

Representation: 835/001,
Representee: Fiona Work

Representation: 834/001,
Representee: Gillian & George Barclay

Comment:

Object to the principle of development of land to the west of Edzell (site reference given as N16) for housing development on the basis that the area is a flood plain and that development for housing would increase the risk of flooding and damage to adjacent properties.

Response:

Whilst housing to the west of Edzell is not the preferred option the comments are noted and will be taken into account in preparing the Proposed Plan.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue: 0

Question: 41

Answer: No

Representation: 809/001

Representee: James Richardson

Comment:

The initial preferred option would only provide housing for low income families as, sandwiched between sewage works and council homes the area proposed would not attract private homeowners. Also, the road structure for access to this area would have to be upgraded. Mentioning the provision of the play area is no longer a feature as this play area is destined for closure. The proposed alternative area of land is on a flood plane which until very recently coped with the excess rainwater. However, recent events would prove that housing built on this area would be nonsensical. Coupled with this, Lethnot Road is very narrow, making travel difficult enough without the added proposal of 50 new homes. An estimated number of additional vehicles would be in the region of approximately 100 extra cars etc .

It would appear these proposal have been suggested with no insight into the long term effects of such a proposal. The alternative plan which has already been declined (at East Mains Farm) would in my opinion be the most suitable for access to all local amenities, i.e. school (which will have to be increased in size to cater for the proposed development) and Medical Centre.

Response:

Potential development options for Edzell have been informed by a range of information sources including Edzell Landscape Capacity Study (2003) as well as other planning, infrastructure and environmental considerations. The 1:200 year coastal and fluvial Flood Risk Maps published by SEPA were also used to inform the MIR options which indicated that the two option sites were outwith the medium to high risk of flooding. Whilst the SEPA 1: 200 Flood Risk Maps were the recognised information source of flooding at the time, the SEPA Flood Maps published in 2014 now take account of flooding from a range of sources including watercourse and surface water flooding. Consultation with Angus Council's Education Service during preparation of the MIR indicates sufficient capacity at Edzell Primary School to accommodate additional housing development and the school roll is falling. Land to the north and south of Edzell at East Mains Farm was discounted as an appropriate development options for Edzell taking into account a range of matters including Edzell Landscape Capacity Study (2003) as well as other planning, infrastructure and environmental considerations. The scale of land available to the east of Edzell provides opportunity for a significant separation distance and landscaped buffer between the wastewater treatment plant and any new development. Detailed matters of design, access and accessibility to open space areas in relation to any land allocation will be considered in preparing the Proposed Plan. Whilst housing to the west of Edzell is not the preferred option the comments are noted and will be taken into account in preparing the Proposed Plan.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue: 0**Question:** 41**Answer:** No**Representation:** 807/001**Representee:** Alan Budge**Comment:**

Object to the preferred and alternative options for development for Edzell proposed in the MIR. Considers that a site at East Mains Farm on behalf of DLB Scotland Ltd is a better option.

Response:

Whilst housing to the west of Edzell is not the preferred option the comments are noted and will be taken into account in preparing the Proposed Plan. Land suggested as a better option to the north and south of Edzell at East Mains Farm is not identified as an option in the MIR. In considering potential development options for Edzell, this area was discounted taking

into account a range of matters including Edzell Landscape Capacity Study (2003) as well as other planning, infrastructure and environmental considerations.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue: 0

Question: 41

Answer: No

Representation: 808/001

Representee: Mr & Mrs Yates

Comment:

This option contradicts the present plans proposed for cutting down the number council maintained play areas in that the adjoining Play area is proposed for closure yet this plan gives as a "Plus" the adjacent existing Play area.

Who will want to live adjacent to a Sewage works? Being adjacent to the "sewage" works will all too often envelope the area with noxious and antisocial "smells" especially if the local wind is from the wrong direction.

How will the traffic into an area of 50 houses be routed through the existing road network? The area cannot truly be considered to be within easy walking distance of existing facilities (schools Surgery church) shops etc for the very young and elderly.

Consider that a site at East Mains Farm is a more suitable development option.

Response:

The scale of land available to the east of Edzell provides opportunity for a significant separation distance and landscaped buffer between the wastewater treatment plant and any new development. Whilst initial consultation with Angus Councils Roads Service informed the MIR options, the Proposed Plan will be informed by a Transport Appraisal which will seek to ensure that land allocations are acceptable or have the ability to be acceptable in terms of impacts on strategic as well as local road networks. Detailed matters of design, access, integration with open space areas and landscaping requirements in relation to any land allocation will be considered in preparing the Proposed Plan. Whilst housing to the west of Edzell is not the preferred option the comments are noted and will be taken into account in preparing the Proposed Plan. Land suggested as a better option to the north and south of Edzell at East Mains Farm is not identified as an option in the MIR. In considering potential development options for Edzell, this area was discounted taking into account a range of matters including Edzell Landscape Capacity Study (2003) as well as other planning, infrastructure and environmental considerations.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue:

Question: 41

Answer: No

Representation: 805/001

Organisation: DLB Scotland Ltd

Agents: Learmonth Estates Ltd

Comment:

Consider that Land at East Mains Farm is more appropriate than the preferred and alternative sites currently proposed in the MIR.

DLB Scotland Ltd is a housebuilder who own the land at East Mains Farm, Edzell (referred to as site 17N in the MJR site assessment). DLB, via their agent Ryden submitted this site at the call for sites stage of the LDP. DLB Scotland Ltd note the land at East Mains Farm has not been

identified within the MIR as the preferred or alternative option for housing development in Edzell and as such make the following submission which we hope will be taken into consideration in finalising

The preferred option within the MIR for new employment use is in the north-west of the village and for housing in the south east. Like the East Mains Farm site, the preferred site in the south east adjoins the River North Esk. The MIR does not suggest the preferred site floods but the MIR text does suggest the East Mains Farm site floods. Attached with this representation is an extract from the SEPA flood map which clearly shows the potential flood area from the river being comparable along its length i.e. the East Mains Farm site is no more likely to flood than the preferred option site to the south east, together with the adjoining sewage works.

To consider these various points in turn.

1. The preferred MIR site to the south east of Edzell, together with the alternative to the south west are all outwith the current development boundary for Edzell. Wherever new housing development is proposed, an amendment to the existing boundary will be required. At East Mains Farm, part of the land owned by DLB is within the existing settlement boundary and which has a resolution to grant planning permission for 13 homes (21.4.08 ref. 07/01413/FUL). It is possible for this resolution to be incorporated within a wider proposal which could offer a range of housing together with wider community benefits. The planning application process that led to that resolution concluded no constraints to development in this location; the Roads (Drainage) conclusion having examined the SEPA 1:200 year flood map being that 'the flood risk from the nearby River North Esk is negligible' leading to no objection on flooding grounds.

2. The impact on landscape character has not been assessed within the Council's environmental report and SEA process. The environmental report assesses two sites only, the Council's preferred option to the south east and the alternative to the south west. No assessment is available for the East Mains Farm site and no view can therefore be taken on likely impact. From initial work DLB Scotland Ltd have undertaken, the impact in landscape terms of developing any three of the proposed housing sites is similar. The local impact on the landscape can be mitigated against in the type and form of development proposed on site. It would be the intention at East Mains to retain all pathways and public rights of way across the site and enhance these. Well landscaped and buffer areas would be provided within a development and a significant area land would be left adjacent to the river. It is also the intention that DLB Scotland Ltd would work with the adjoining primary school, health centre and local community members in order to provide some enhanced local facilities. DLB Scotland Ltd note that the HMI report of 2004 for Edzell primary school notes that the parents, teachers and staff feel the new school building is good but too small. It is possible that further land could be made available for the school to expand its facilities in the future if East Mains Farm were to be the preferred location for longer term housing development.

3. The assessment refers to East Mains being poorly integrated with the existing settlement. The site is as well, if not better located to the settlement as the preferred and alternative options. Much of the village activity takes place in the north of the village, with the primary school, health centre, church and recreational areas very close to the site. Many of the car trips and pedestrian/ cycle movement within the village will be directed to these facilities in the north. In order to be promoting a sustainable community, in line with Government policy, the Council should be directing new development to locations where the need to travel can be reduced. East Mains also provides easy access to the High Street, Post Office and local hotels.

The East Mains Farm site is considered below in respect of the tests within PAN2/2010 which demonstrates the deliverability of the site:

1. Ownership - The site is in the ownership of OLBScotland Ltd who is able to develop it. The site to the south west is not owned by a housebuilder. No ownership details are given within the MIR for the preferred site to the south east and it was not put forward at the call for sites stage. Nevertheless, DLB Scotland Ltd understand this is not within the ownership or control of a housebuilder.
2. Physical - East Mains is free from development constraints, vehicular access is available, and ground stability is acceptable. The localised landscape impact can be mitigated by way of developing an appropriate development scheme which takes account of the terrain with the Council and local community. All flora and fauna considerations would be taken into account including the enhancement for community activity and walks along the river.
3. Contamination - East Mains Farm site is not contaminated.
4. Marketability - The can be developed within the LOtimeframe.
5. Infrastructure - East Mains Farm site is free from constraints allowing the owner to develop the site.
6. Land Use - Housing and enhanced community facilities are the preferred option moving forwards in the emerging LOP and these can both be met at East Mains Farm which is close to compatible land uses and facilities (such as school/ health centre etc.),

Paragraph 8 page 110 of the MIR refers to the lack of developer interest in the East Mains Farm site. This is not true. DLB Scotland Ltd own and will develop out the site. There is housebuilder demand for new homes at East Mains and the demand extends to a wider scheme capable of accommodating a mix of tenures to meet the future housing requirements of Edzell in a sustainable location.

The land at East Mains Farm offers a cohesive option for housing and enhanced community facilities to the overall betterment of Edzell. DLB Scotland Ltd request that the Council re-consider their preferred and alternative locations for new housing in preference for East Mains Farm.

Response:

Potential development options for Edzell have been informed by a range of information sources including Edzell Landscape Capacity Study (2003) as well as other planning, infrastructure and environmental considerations. Whilst housing to the west of Edzell is not the preferred option the comments are noted and will be taken into account in preparing the Proposed Plan. Landscape and visual aspects of housing expansion and impact on the historical pattern and form of development in Edzell was a key consideration in assessing development options. Land suggested as a better option to the north and south of Edzell at East Mains Farm is not identified as an option in the MIR. Urban extension onto land surrounding East Mains Farm was dismissed as an appropriate development option as it would deviate from a distinctive and key aspect of Edzell's landscape character and setting.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue: 0 **Question:** 41 **Answer:** No

Representation: 817/001

Representee: Marian Robertson

Comment:

Object to the principle of development of land to the west of Edzell (site reference given as N16) for housing development on the basis that the area is a flood plain and that development for housing would increase the risk of flooding and damage to adjacent properties.

Consider that a site at East Mains Farm is a better option.

Response:

Whilst housing to the west of Edzell is not the preferred option the comments are noted and will be taken into account in preparing the Proposed Plan. Land suggested as a better option to the north and south of Edzell at East Mains Farm is not identified as an option in the MIR. In considering potential development options for Edzell, this area was discounted taking into account a range of matters including Edzell Landscape Capacity Study (2003) as well as other planning, infrastructure and environmental considerations.

Recommendation:

No Change. These representations will be considered in preparing the proposed Plan.

Main Issue: 0 **Question:** 41 **Answer:** No view

Representation: 836/001

Representee: Hilary Swinscoe

Comment:

Don't believe that Edzell requires any additional housing as the housing will not be affordable for the local community. However if there is intention on behalf of the council to proceed with a building plan then option 1 would be the preferable option combined with a large portion of affordable housing restricted to the local community needs. If a large amount of new houses were built in this village they will end up in the hands of people commuting to Aberdeen for employment and spending money there shopping in larger shops on the commute rather than contributing to the local community.

Would love to see the old mart being developed not for housing but to provide employment for local residents.

The second option would not in my opinion be a suitable alternative as it is a known area prone to flooding as has been recently proved. This area used to flood on the new housing development but recently flooded a larger area of the village as the burn was no longer able to go to the old school play area.

Response:

Comments in relation to the spatial strategy including opportunities for new housing in the four Rural Service Centres are considered under Chapter 3 (Refer to response provided to Local Development Plan Proposed Spatial Strategy). The preferred option identifies the former mart as an opportunity site for small scale employment uses. In line with the preferred option for the development of new affordable homes (Main Issue 2 of MIR) 25% of the new units built in Edzell will require to be for affordable housing. The 1:200 year coastal and fluvial Flood Risk Maps published by SEPA were also used to inform the MIR options which indicated that the two option sites were outwith the medium to high risk of flooding. Whilst the SEPA 1: 200 Flood Risk Maps were the recognised information source of flooding at the time, the SEPA Flood Maps published in 2014 now take account of flooding from a range of sources including watercourse and surface water flooding. Comments in relation to specific locations are noted and will be taken into account in preparing the Proposed Plan.

Recommendation:

No Change. This representation will be considered in preparing the proposed Plan.

Main Issue: 0**Question:** 41**Answer:** No**Representation:** 837/001**Representee:** Peter Swinscoe**Comment:**

Not convinced that Edzell needs to continue growing. If you are to build new houses at option 1 how many will be affordable housing that would be suitable for the local community? Where will the people work who are going to live in the proposed housing? If they are to commute to Aberdeen then you are only adding to the countries emissions and traffic congestion, is that wise? People who work in Aberdeen and Dundee do not add to the community and spend money in the shops there not in the local community.

Response:

Comments noted. Comments in relation to the spatial strategy including opportunities for new housing in the four Rural Service Centres are considered under Chapter 3 (Refer to response provided to the Proposed Spatial Strategy). In line with the preferred option for the development of new affordable homes (Main Issue 2 of MIR) 25% of the new units built in Edzell will require to be for affordable housing.

Recommendation:

No change.

Main Issue: 0**Question:** 41**Answer:** No**Representation:** 810/001**Representee:** Carol Mcguire

Chapter 15 – Question 42 Do you think that 50 new homes would be a suitable level of new housing to meet local needs, or to support regeneration of the local economy within Edzell over the period 2014-2024? Please explain your answer

Main Issue: 0

Question: 42

Answer: No

Representation: 820/002

Representee: Andrew & Fiona Burnett

Comment:

50 additional homes is too high a number for Edzell and would adversely affect the intrinsic character of the village. Employment opportunities within the immediate area are low and is likely to remain so over the 2014 - 2024 period. Therefore the provision of 50 new homes and potentially 200 new residents will be done so under the assumption that residents will travel to their place of work (be that Aberdeen, Dundee or the larger towns in Angus).

The substantial provision of additional housing at Edzell Woods directly addresses this demand need over the period. In addition, the improvements required to the local services and infrastructure to support this population increase will change the character of the village from a highly attractive "picture postcard" destination that attracts tourists to Angus to that of a commuting town.

Response:

Comments in relation to the spatial strategy for rural Angus including the preferred option to allocate small scale development sites in the four Rural Service Centres are considered under Chapter 3 (Refer to response provided to Local Development Plan Proposed Spatial Strategy).

Comments on the availability of employment opportunities in Edzell are noted. TAYplan SDP seeks to support employment opportunities in Angus to reduce commuting to other areas by focusing the majority of economic development in the principle settlements and allowing some development in rural areas to meet specific local needs or support regeneration of the rural economy. As highlighted in the preferred options for achieving sustainable prosperity (Main Issue 7) the focus of employment sites within principle settlements ;facilitating appropriate employment development in the rural by identifying employment opportunity sites and, providing opportunities for businesses that require a rural location seeks to reduce commuting and provide employment opportunities whilst maintaining the high quality of our rural environment. This is also reflected in preferred option for Edzell which identifies the former mart as an opportunity site for small scale rural employment uses.

The specific development options have been informed by a Landscape Capacity Assessment for Edzell which considered the landscape and visual aspects of housing expansion along with a range of other planning, infrastructure and environmental considerations. As highlighted in the preferred option for Edzell and the preferred option for developing high quality places (Main Issue 8 of MIR), a masterplanning approach to placemaking for new development will ensure that the quality of Edzell is maintained and enhanced.

Recommendation:

No Change

Main Issue: 0

Question: 42

Answer: No

Representation: 903/002

Organisation: Inveresk Community Council

Representee: Judith Gallacher

Comment:

At our meeting of 10 December, 2012, Mr Pyper, Development Plan Manager, gave a presentation of the Main Issues Report and answered questions. He informed the meeting that Edzell needed further housing development in order to continue to be a self-sustaining community. We disagreed with this reasoning and would argue that Edzell is continuously self-sustaining and if the Council was concerned about self-sustainability then it would have been more proactive in encouraging the development of a Visitor Centre on the old mart site or attracting more events/activities to The Inglis Hall via their Leisure and Recreation Department. In fact Mr Pyper did at one point comment that there was "no driving desire to develop around Edzell".

Meanwhile, there are a number of new developments proposed for the surrounding area. Notably, 13 new houses at East Mains Farm, approx 250 houses initially on land adjacent to Edzell Woods (with the proposal for 750 to develop 'Newesk') and 115 new houses on Fasque Estate. These developments provide a large number of new houses within a 5 mile radius of Edzell providing accommodation mainly for commuters as there is very little in the way of new employment in the area. Surely it would make more sense to build nearer the areas of employment thus cutting down on the amount of extra traffic on narrow country roads and the problems associated with travel during bad weather conditions from outlying areas.

Representation: 808/002

Representee: Mr & Mrs Yates

Comment:

What are these local needs? The "needs" will almost certainly only "satisfy" commuters to work in Aberdeen and Dundee

Representation: 836/002

Representee: Hilary Swinscoe

Comment:

50 houses are far too many for the local community to cope with, unless there is a positive drive to provide better employment in the local area. There are very few opportunities for this due to the limited availability for industry in the area unless this is encouraged on the old airbase rather than allowing this area to be turned into housing.

If all the housing that is planned to be built in this area were to be completed what chance would the young people of Scotland have? Also all this extra commuting will increase the emissions caused by commuting.

Response:

Comments in relation to the spatial strategy for rural Angus including the preferred option to allocate small scale development sites in the four Rural Service Centres are considered under Chapter 3 (Refer to response provided to Local Development Plan Proposed Spatial Strategy).

Comments in relation to commuting and the lack of employment opportunities in Edzell are noted. TAYplan SDP seeks to support employment opportunities in Angus to reduce commuting to other areas by focusing the majority of economic development in the principle settlements and allowing some development in rural areas to meet specific local needs or support regeneration of the rural economy. As highlighted in the preferred options for achieving sustainable prosperity (Main Issue 7) the focus of employment sites within principle settlements ;facilitating appropriate employment development in the rural by identifying employment opportunity sites and, providing opportunities for businesses that require a rural location seeks to reduce commuting and provide employment opportunities whilst maintaining the high quality of our rural environment. This is also reflected in preferred option for Edzell which identifies the former mart as an opportunity site for small scale rural employment uses.

Recommendation:

No Change

Main Issue: 0**Question:** 42**Answer:** No**Representation:** 837/002**Representee:** Peter Swinscoe**Comment:**

If the council were to commit to encouraging employment into the area then people would move to the area to do work and then add money and life to the local area, unless this is done only people who work outwith the area will buy housing, thus forcing up prices and contributing little.

The old Market should be developed and the airbase should be made use of to produce employment by encouraging business to the area, rather than the short term thinking of building a house for work that will eventually disappear the same way the oil will go. A country can only prosper if it is able to produce goods. If there is no local employment you don't need a house for the workers to live in.

Response:

The former Edzell Airbase is located within Aberdeenshire outwith the administrative area of Angus. Comments in relation to the spatial strategy for rural Angus including the preferred option to allocate small scale development sites in the four Rural Service Centres are considered under Chapter 3 (Refer to response provided to Local Development Plan Proposed Spatial Strategy). In line with the preferred option for the development of new affordable homes (Main Issue 2 of MIR) 25% of the new units built in Edzell will require to be for affordable housing. Comments on the availability of employment opportunities in Edzell are noted. TAYplan SDP seeks to support employment opportunities in Angus to reduce commuting to other areas by focusing the majority of economic development in the principle settlements and allowing some development in rural areas to meet specific local needs or support regeneration of the rural economy. As highlighted in the preferred options for achieving sustainable prosperity (Main Issue 7) the focus of employment sites within principle settlements ;facilitating appropriate employment development in the rural by identifying employment opportunity sites and, providing opportunities for businesses that require a rural location seeks to reduce commuting and provide employment opportunities whilst maintaining the high quality of our rural environment. This is also reflected in preferred option for Edzell which identifies the former mart as an opportunity site for small scale rural employment uses.

Recommendation:

No Change

Main Issue: 0**Question:** 42**Answer:** No**Representation:** 814/002**Representee:** Barbara Anderson**Comment:**

Abedeenshire Council is proposing in its own Local Devlopment plans for 300 houses to be built at Edzell Woods, with plans to have a total of 1000.

With this number of houses being built in such close proximity to Edzell, I do not think that the village needs 50 new homes to support local needs.

Response:

The former Edzell Airbase is located within Aberdeenshire outwith the administrative area of Angus. Comments in relation to the spatial strategy for rural Angus including the preferred option to allocate small scale development sites in the four Rural Service Centres are considered under Chapter 3 (Refer to response provided to Local Development Plan Proposed Spatial Strategy)

Recommendation:

No Change

Main Issue: 0

Question: 42

Answer: No

Representation: 810/002

Representee: Carol Mcguire

Comment:

There is not a need to develop 50 new homes in Edzell. Edzell shops survive very well with locals and tourists. There are very few jobs available in Edzell and any workers would most likely have to commute. The bus service is very poor. There has been flooding very recently in the proposed development site 16n and it would appear unwise to build more houses in this area.

Response:

Comments in relation to the spatial strategy for rural Angus including the preferred option to allocate small scale development sites in the four Rural Service Centres are considered under Chapter 3 (Refer to response provided to Local Development Plan Proposed Spatial Strategy).

Comments on the availability of employment opportunities in Edzell are noted. TAYplan SDP seeks to support employment opportunities in Angus to reduce commuting to other areas by focusing the majority of economic development in the principle settlements and allowing some development in rural areas to meet specific local needs or support regeneration of the rural economy. As highlighted in the preferred options for achieving sustainable prosperity (Main Issue 7) the focus of employment sites within principle settlements ;facilitating appropriate employment development in the rural by identifying employment opportunity sites and, providing opportunities for businesses that require a rural location seeks to reduce commuting and provide employment opportunities whilst maintaining the high quality of our rural environment. This is also reflected in preferred option for Edzell which identifies the former mart as an opportunity site for small scale rural employment uses. Whilst housing to the west of Edzell is not the preferred option the comments are noted and will be taken into account in preparing the Proposed Plan.

Recommendation:

No Change. This representation will be considered in preparing the proposed Plan.

Main Issue:

Question: 42

Answer: Yes

Representation: 796/008

Organisation: Dalhousie Estates

Agents: Ristol Ltd

Comment:

Dalhousie Estates support the Preferred Option of an allocation of land on the eastern side of Edzell for future residential development. This land is owned by Dalhousie Estates and is available for development.

The spatial strategy of providing for an initial release of land for circa 50 units is endorsed. It is submitted that the Proposed Plan continues this allocation with a provision that future phases of land adjoining the site could be released linked to housing land audits in order to maintain

an effective housing land supply. This reflects the policy provisions contained within the Scottish Planning Policy that the planning system should be plan led, with development plans setting out ambitious, long term visions that create the confidence necessary for parties to invest in long term infrastructure provision and design to facilitate quality outcomes.

Dalhousie Estates support the policy provision within the Main Issues Report (MIR) of a masterplan led approach to development. A concept framework plan accompanying this representation identifies the key components of such a masterplan for the Preferred Option with its focus on;

- access;
- the location of housing parcels of differing market tenure within areas of the site that have the landscape and visual capacity to accommodate development; and
- linkages into the village and core amenities, including the primary school, health centre and shops.

Through a series of proposed footpaths and cycleways an integrated green network is proposed for the for the benefit of both the existing community and future residents. Advanced planting is proposed along the eastern boundary. A transportation assessment accompanies this representation which demonstrates that the site is highly sustainable in terms of facilitating non vehicular travel patterns by virtue of its accessibility to existing amenities, including bus stops and the proposed footpath and cycleway strategy designed to connect the proposed development to core services.

It is within this context that Dalhousie Estates submit that the land shown in paragraph 10 of the MIR Edzell settlement statement and contained within the accompanying Figure in this submission is allocated within the Proposed Plan for residential development, with an initial phase identified for 50 units, as shown in the accompanying Concept Framework. The development framework is intended to demonstrate that the Preferred Option has the potential to meet both local housing market needs and support rural regeneration through the proposed land use mix and linkages to exiting amenities and services within the town.

In terms of the Alternative Option, Dalhousie Estates contend that over time the site will have the potential to deliver high quality new housing to deliver local housing needs and support rural regeneration. Dalhousie Estates consider that advanced planting along the outer western boundary as shown in paragraph 14 would create a framework to accommodate long term development needs and ensure future development is contained within a mature landscape setting. This would "follow on" from development to the east of the village which forms the Preferred Option and is endorsed by Dalhousie Estates. In order to create the requisite confidence in the plan making process that would enable investment in strategic planting, Dalhousie Estates submit that the Proposed Plan provides for a "western longer term direction of growth" for progression through subsequent plan reviews.

Response:

Support for Preferred Option noted.

Recommendation:

No Change

Main Issue: 0

Question: 42

Answer: No

Representation: 809/002

Representee: James Richardson

Comment:

Edzell could no longer be classified as a village.

Response:

Main Issue: 0

Question: 42

Answer: No

Representation: 813/002

Representee: Judith Gallacher

Chapter 16 Friockheim

Chapter 16 - General

Representation: 916/076

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Friockheim Preferred

Flood Risk:-

None Known at site. No flood risk apparent.

Water Environment:-

Waste water treatment works at capacity.

Representation: 916/077

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Friockheim Alternative

Flood Risk:-

None Known at site.

The extent of the site boundary is uncertain. The Lunan Water is on the northern boundary of the indicated area. The flood risk associated with the River would need to be considered but a large area is likely to be available for development.

Water Environment:-

Waste water treatment works at capacity.

Representation: 901/011

Organisation: Scottish Water

Representee: Adele Gallagher

Comment:

Scottish Water is funded to provide upgrades at treatment works where the 5 growth criteria have been met and so limited capacity should not be seen as a barrier to development.

Early conversations between Scottish Water and the developer are advised to allow maximum time for scheduling upgrades.

Representation: 901/012

Organisation: Scottish Water

Representee: Adele Gallagher

Comment:

Scottish Water is funded to provide upgrades at treatment works where the 5 growth criteria have been met and so limited capacity should not be seen as a barrier to development.

Early conversations between Scottish Water and the developer are advised to allow maximum time for scheduling upgrades.

Response:

Comments noted .

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan

Representation: 760/019

Representee: Mr M Batchelor

Agents: Emac Planning LLP

Comment:

Land East of Friockheim, Farnell Road, Friockheim

The site to the east of Friockheim extends to an area of approximately 10.0 hectares and is considered capable of accommodating around 150-200 houses over the short, medium and long-term, together with improved recreational/community facilities. It is anticipated that 50 - 100 houses could be developed in the short-term, between 2014-2019, with the remaining development potential following thereafter.

This site is capable of comfortably accommodating new development within the local and wider landscape setting whilst also contributing to the effective housing land requirement of the Housing Market Area and sustaining local services and facilities in Friockheim.

The easterly growth of Friockheim, not only respects the previous historic growth of the village, but also allows new development to have cognisance of the established characteristics of the 'planned' village through the development of design principles guiding the future development of the site through a masterplanning process. It is intended that this process will develop in liaison with the community and other interested parties including Angus Council.

The site is free from infrastructure constraint and is accessible; in summary:

- Access: Satisfactory access can be achieved from the B965 and from Kirkden Street.
- Ground Contamination: No known constraint
- Flooding: SEPA Flood Map cautions that there may be localised flooding from the Lunan Water on the northern boundary of the site although this will not effect the development opportunity
- Trees/Woodland: No constraint
- Wildlife/Habitat: No known constraint (subject to survey)
- Archaeology: No known constraint (subject to survey)
- Drainage: Improvements required to the wastewater treatment plant required.
- Water Supply: No known constraint
- Ownership: No constraint
- Right of Way/Core Path: No Core Paths cross the land although connections can be made to to adjacent Core Paths 120, 119 and 116. Connections can also be made into adjoining adopted roads and footways which form part of the wider Network.
- Path/Cycle Network: adjacent to site on adopted roads and footways
- Bus Stop: within 500m
- Train Station: approximately 12km (Arbroath)
- Availability for Development: Within 0-5 years (Phase 1: 50 - 100 houses approximately) and 5 to 10 years (Phase 2 – 50 -100 houses approximately)

It is respectfully requested that the subject land is identified as a preferred option for development within the Proposed Angus Local Development Plan. The size of the site within the tree belt ensures both immediate and longer terms housing need can be accommodated through both mainstream and affordable housing.

Response:

The ability of the alternative option to accommodate development is accepted in the MIR but the reasons for advancing the preferred option as defined within the MIR remain. Development south of Gardyne Street accords with the principles established through the Local Plan Inquiry into Unresolved Objections to the Finalised Angus Local Plan Review and the subsequent approved plan.

Recommendation:

No change.

Chapter 16 – Question 43 Do you agree with the preferred option for the development of land around Friockheim? Please give reasons for your answer and (if appropriate) describe any alternative option that you would prefer.

Main Issue: 0

Question: 43

Answer: No

Representation: 898/001

Organisation: Friockheim & District Community Council

Representee: Dougie Pond

Comment:

The Friockheim community is, in the main, still very unhappy about the decision to allow the development of up to 40 houses to the South of Gardyne Street. This development was strongly opposed during the consultation and appeals processes relating to the decision. Whilst accepting that the decision is now a matter of history, and it is only to be expected that the 'losers' will have louder voices than the 'winners' following any such decision, that does not change the very real anger that many within the village feel about the decision, and this anger does not appear to have dissipated in any way.

The situation has been further compounded by the fact that to date there is no indication of any development commencing on the site, the boundary wall on the South of Gardyne Street being breached and damaged, and the reported inability of the NHS to fund the suggested new Medical Centre within the development.

The consequence is that many of the Friockheim Community are wondering why the integrity of the triangular village was breached, yet nothing is happening other than a deterioration of the boundaries of the area and the possible improvement in facilities that the new Health Centre would bring has disappeared.

The location south of Gardyne Street is likely to result, in sociological terms, in 'two' villages, one South of Gardyne St and the other the existing village to the North.

As virtually all the existing facilities and infrastructure, with the exception of the Co-op store is to the North of Gardyne St, the resulting pedestrian traffic, including school children, crossing Gardyne Street will be considerably increased, Gardyne Street is a busy thoroughfare with heavy bus and lorry traffic along what can be a one lane highway with parked cars on either side of the road. This must increase the potential for accidents.

There are other sites within the village, to the North of Gardyne Street.

3 main points that give us cause for concern regarding Gardyne Street development being given preferred option status:

- Traffic problems that already exist on Gardyne Street between the Church and Star Inn will not be improved.
- Village being left with no new houses being built if Gardyne Street development is extended – a case of putting all our eggs in the one basket and being beholden to one developer and the economic/financial constraints they have.
- Recurring problem of flooding in the field now ear-marked for development. Flood water sits for some time within that area having no natural drainage.

Plus points for the Alternative Option:

- The new access road in at the east of the school would extend the 30mph limit and reduce drivers speed for pedestrians crossing between the school and park.
- Site is easily connected to the sewage plant and easily drained.
- Site has good access (already!) to the park, Border wood and Clay Braes.
- Site now has a defined boundary – strip of well established trees and wildlife habitat.
- Site would continue the unique triangular shape of the village.
- Also, the developer has proven record in Friockheim!!

Response:

No comments have been submitted by residents voicing concern with the preferred option and SEPA has not raised concerns regarding surface water ponding.

The Public Inquiry into unresolved objections to the ALPR addressed many of the concerns raised including traffic, access to services, village character etc. These findings remain valid.

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan.

Main Issue: 0**Question:** 43**Answer:** No**Representation:** 760/017**Representee:** Mr M Batchelor**Agents:** Emac Planning LLP**Comment:**

We agree that there is a very strong case for the allocation of new housing land at Friockheim over the LDP period, but have concerns over the delivery of the preferred option and the implications of this allocation.

Support for Principle of Growth

We agree with the general strategy for the LDP which seeks to guide the majority of new housing and employment development to locations within the principal settlements that have the capacity to accommodate new development integrated with transport infrastructure. We support the identification of Friockheim as an appropriate settlement for growth, which reflects the requirements of the TAYplan SDP, 2012.

The allocation of a healthy supply of land will seek to address the planning issues affecting the Housing Market Area in general as acknowledged in paragraph 7.12 of the MIR. It is noted that the supply of affordable housing provision continues to be an issue that there is an emerging surplus of small (one or two bedroom) affordable homes by 2018/19, but also a growing shortfall of larger properties. There is an on-going need to replace lower-quality and end-of-life affordable housing stock. A healthy supply of housing will seek to address these issues.

Paragraph 1 of the MIR on Friockheim identifies that the village is one of the largest villages in rural Angus and the largest in the East Angus HMA. The MIR recognises that "Friockheim is an important rural service centre providing a range of local services and some local employment. It is geographically central within Angus with good road connections to the surrounding area reflected in the presence of local bus and lorry depots. It has therefore developed a commuter role with residents living in the village and working in larger employment centres."

In terms of constraints, the MIR positively identifies that Friockheim is in a good location in terms of the existing capacity of infrastructure and services to accommodate new growth. Although an upgrade is required to the waste-water treatment plant, "There are no capacity issues at Friockheim Primary School or Arbroath Academy and new housing could help to maintain pupil numbers at these schools...".

The MIR considers that the two sites promoted in the MIR for the development of additional new homes, indicate a level of confidence in the financial viability of sites within Friockheim. Although these sites are in agricultural use, neither includes any large areas of prime quality agricultural land. One of these sites, that is, land to the east of Friockheim, is the subject of this submission, and is the alternative option for land allocation. The landowner is confident that

the site is viable and can effectively deliver housing land. The landowner has a proven track record in building and delivering housing land in recent years to the east of Friockheim.

We would support the Council's analysis of Friockheim and consider this supports the allocation of a healthy supply of new land within the Village and the elevation of the stated Alternative Option to the Preferred Option, with a first phase of this site being allocated for development in the first period of the LDP, that is, between 2014-2019.

We do not support the Preferred Option and have concerns over its location, deliverability and the implications of the allocation for any development coming forward in Friockheim between 2014-2019.

The preferred option to enable the redevelopment of existing sites within the village and to consolidate future growth to the south of Gardyne Street is not supported for the following reasons:

* This option does not relate to the "redevelopment of an existing site" as the allocation at FK2 at land south of Gardyne Street has not been built and therefore does not yet exist as a site.

* Whilst a planning application Ref:11/00002/PPPM was granted in December 2011 for new housing, open space, a new health centre and public car park for this site, the development has not been forthcoming to date, despite the site having been allocated for almost a 4 year period.

* The MIR and Audit identify that development is expected to commence in 2013/14 with completion by 2017/2018, however, further applications will need to be made to the Council for the detailed elements of the proposal and it is queried whether development will start in 2013.

* There is a further concern that the development may not be delivered, in any case, over the 5 year period anticipated. We are concerned that as the applicant has a number of other allocated sites in the area, for example at Kirriemuir and Forfar, these sites may take precedent in terms of implementation, over this allocation.

* It is also noted that this site is susceptible to flood risk, which is a constraint which should be taken into consideration. Photographs of the site on 21st December 2012 indicates that both the existing site and the proposed extension to it, are susceptible to flooding and may not be suitable for new residential development. Photos also show the field to the east of Friockheim, subject to this submission, which, by way of comparison, was freely draining on the same day, with no flood risk.

* The permission and allocation are in the meantime suggesting that a supply of housing is available, whereas there is no certainty on delivery. This has the impact of other sites not coming forward in the meantime, such as this site.

In addition, it is considered that the siting of development to the South of Gardyne Road fails to address the historic pattern of growth of Friockheim and the planned characteristics of the village. The issue of "placemaking" has been elevated in recent years and the principles of good urban design embodied into Scottish Government Planning Policy through Designing Streets and Designing Places. The Government has also recently published in 2011 its document entitled "Green Infrastructure: Design and Placemaking" reinforcing the principles contained in Designing Places, within the context of delivering green infrastructure through new developments.

Whilst the Council has committed to an initial development to the south of Gardyne Road through the Planning Permission in Principle, no indicative details on the layout of the development were submitted with the application and no approval given to the location of the open space or health centre. There is no information before the Council to illustrate that the development will contribute to the objectives of placemaking, or an extension to it.

The Council had identified this site, to the East of Friockheim, as their preferred site in the Finalised Local Plan. It is considered that a further allocation to the south of Gardyne Road should not be preferred, as the direction of growth is inappropriate and there is some uncertainty on the deliverability of the allocated site within the timeframe currently anticipated. Moreover, there is not an indicative design framework publically available that illustrates how the allocated site and a further potential extension to it would address the issues of placemaking. It is considered that the Council should return to the view previously held, that the growth of Friockheim should be to the east.

It is considered that the description of Friockheim contained in the MIR supports development to the east, in preference to the south, stating that "Friockheim was a planned village and one of its principal characteristics is the original compact triangular form. ... Recent housing development has taken place at the eastern end of the village where the landscape is generally flat and open, the area having been restored following mineral extraction. ...Gardyne Street currently provides the southern boundary with views across open agricultural land, set against a woodland backdrop of Friock Wood".

The Council's description of Friockheim identifies that the landscape to the east is favourable and there is an implication that the southern village boundary provided by Gardyne Street provides for a long-term stable boundary, with southerly open views beyond, which should be retained.

The preferred option will simply exacerbate what is considered to be a poorer location for the future growth of the village on a site where there is no certainty of delivery.

Response:

Support for alternative option noted.

The preferred option is 'to enable redevelopment of existing sites within the village and to consolidate future growth to the south of Gardyne Street'. Site FK2, within the Development Boundary of the village, is subject of a valid planning consent and development brief, which was subject to public consultation. It is not subject to review in the MIR and speculation about that application and developer are not relevant. The MIR proposes the allocation of further land.

SEPA has not raised concerns regarding surface water ponding, which can be addressed through SUDs.

The Public Inquiry into Unresolved Objections to the Finalised Angus Local Plan Review in 2006 addressed many of the concerns raised including traffic, access to services, village character, landscape setting etc . The Reporter's findings remain valid.

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan.

Main Issue:

Question: 43

Answer: Yes

Representation: 786/025

Organisation: Guild Homes

Representee: Mark Guild

Comment:

At the time of the enquiry into the ALPR there was a great deal of debate to the future direction of growth for Friockheim. The Reporter concluded that the Gardyne site would offer the most central location offering the best opportunity to consolidate the core village facilities. Angus Council in conjunction with Guild Homes has completed a development brief for the site on Gardyne Street.

This includes a large area of public open space, public car park and an area set aside for a possible future health centre. Guild Homes is hoping to lodge detailed development plans in early 2013 with development starting on site in Autumn 2013. It is logical and sensible that any further residential land allocations continue this established pattern. Guild Homes would look to extend the boundary of the development brief to cover any future land allocation in the Angus LDP.

Response:

Supported noted.

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan.

Main Issue:

Question: 43

Answer: Yes

Representation: 798/043

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Comment:

Froickheim preferred option:

Scottish Natural Heritage welcome recognition of Friock Wood AWI site which lies to the southern boundary of the preferred site (long established plantation origin) and creation of habitat links between the site and other woods/trees lines. Scottish Natural Heritage also support the redevelopment of existing sites within the village and note that the preferred site south of Gardyne Street has been approved for around 40 new homes and mixed use. It therefore seems logical to consolidate this site with the additional limited new houses required.

Landscape and visual impacts:

No settlement landscape and visual analysis is available and we recommend further capacity work and mitigation measures in relation to the preferred option where some development has already been approved. This is a large scale development proposed in relation to existing settlement size. There is potential for significant landscape and visual impacts on the historic triangular settlement core, which may not be mitigated by existing tree cover. Historic dwellings are orientated south with views across open fields.

Comments on alternative option 1: Landscape and visual impacts: This site is remote from the settlement core and any development should be set back from Lunan Water. The existing settlement edge is visually mitigated by tree belts and hedgerow. This is a smaller scale new development, with potential for mitigation of landscape and visual impacts with similar palette of structure planting. New planting should help improve connectivity with other areas of woodland/ tree lines in the vicinity etc.

Response:

The Assessment of Possible Development Areas 2003 includes Froickheim and further landscape work was submitted at the time of the Public Inquiry into Unresolved Objections to the Finalised Angus Local Plan Review in 2006. This has been used to inform the MIR options at Froickheim. SNH were consulted on and had input into the development brief for site Fk2.

Preferred option – support noted.

Alternative option – comments noted.

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan.

Chapter 16 – Question 44 Do you think that 50 new homes would be a suitable level of new housing to meet local needs, or to support regeneration of the local economy within Friockheim over the period 2014-2024?

Main Issue: 0

Question: 44

Answer: No

Representation: 898/002

Organisation: Friockheim & District Community Council

Representee: Dougie Pond

Comment:

Many within the community are extremely concerned that the Local Development Plan is indicating the development of a further 50 houses on an adjacent site to the South of Gardyne Street.

It is accepted that this development is for the long term and will help to retain the population of the village and hopefully the subsequent facilities and infrastructure, however, based on the community feeling the Community Council would highlight the following:

1) If it is proving difficult for 40 houses to be constructed on the site, why is it thought that a further 50 should be added?

2) 90 houses in what is basically 1 area / development would constitute an increase of approximately 30% of the village housing stock, in one place. This could lead to the development being seen as a 'scheme' area, with all the connotations that this brings, especially bearing in mind the attitude to the development stated above.

It should be possible to consider a group of smaller scale developments at various places within the village.

The facilities within Friockheim are very limited, 2 shops, 1 chemist, 1 Health Centre, 1 Primary School, 2 Halls and 1 Church. 90 houses will place a great pressure on these facilities.

Already, many people living in Friockheim travel, out with the village to work, for leisure, for shopping, for facilities. This places demands on bus services, the road network, etc and means a comparatively high carbon footprint for the village. 50 more houses will only increase this.

In conclusion, the Friockheim and District Community Council, basing its view on the feeling of many within the community, cannot support the proposal for the development of a further 50 houses to be sited to the South of Gardyne Street adjacent to the existing development site.

Response:

The MIR identifies four larger villages where small scale development sites which have the most significant number and range of services, have a relatively large resident population and where development could support existing services and provide a sustainable pattern of growth in the rural areas. The level of development proposed is deemed sufficient to maintain a healthy population without overdevelopment or promoting unacceptable levels of car travel. Friockheim is one of these settlements and development is limited over the plan period to allow incremental development which can be absorbed without undermining the village's character. Increasing the number of units as proposed would increase the village by over 50% within the plan period.

The site south of Gardyne Street has a current consent and can come forward as the economic outlook improves as there is no reason to assume the allocation is not an effective housing site.

No objections have been made by public or private service providers.

Small scale development/redevelopment proposals within the development boundary will be considered under relevant policies within the Proposed ALDP where appropriate.

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan.

Main Issue: 0

Question: 44

Answer: No

Representation: 760/018

Representee: Mr M Batchelor

Agents: Emac Planning LLP

Comment:

Table 7.3 of the MIR identifies an indicative additional requirement of 350 units for the East HMA, however, it is submitted that the HLR should be higher. In addition, the housing supply will inevitably diminish by the time the LDP is adopted. In order to ensure there is a continuous effective 5 year housing land supply at all times, together with a generous supply, all in accordance with national and strategic requirements, it is considered that an additional 50 houses provides for insufficient housing land for Friockheim. The alternative option should be elevated to the Preferred Option, or brought forward into the first period of the LDP for between 50-100 houses.

We consider this suggestion is supported, having regard to the responses above, and based on the following summary of the issues on housing land:

* The Housing Land Requirement should be more generous and this would justify the identification of further housing land in the first 5-year period of the LDP.

* The Housing Land Supply is currently insufficient and will decrease further before the LDP is adopted and this would justify the identification of further housing land in the first 5-year period of the LDP.

* The growth of Friockheim forms part of the strategy in the LDP for directing development to the principal villages, however, the existing allocation has not yet delivered and we consider further growth to the south of Gardyne Road to be inappropriate. The allocation of the currently proposed 50 houses, within the Preferred Option, is insufficiently flexible to ensure deliverability and a more generous supply should be provided in Friockheim to overcome this issue and delivery the Council's strategy. The alternative option should therefore be identified for growth in the LDP period of 2014-2019.

It is noted that paragraph 7.6 of the MIR states that the "The options typically include far more land than has been calculated as necessary for new development, because it is important to ensure that these options are comprehensive and "future proof". Land to the east of Friockheim, is a preferred alternative site and is considered to be 'future proof'. As such its status should be elevated and identified for development within the first 5 year period of the LDP.

In conclusion, the site to the east of Friockheim fulfills the strategy for growth identified in the LDP, the site is deliverable, free from infrastructure constraint and in an optimum land use location to delivery the growth requirements of the largest village in the area. The development is not only capable of delivering new housing, but would also support local service provision and community facilities.

It is respectfully requested that the following site-specific information in support of prioritising land to the East of Friockheim for development in the first period of the LDP is taken into consideration.

Response:

The MIR identifies four larger villages where small scale development sites which have the most significant number and range of services, have a relatively large resident population and where development could support existing services and provide a sustainable pattern of growth in the rural areas. The level of development proposed is deemed sufficient to maintain a healthy population without overdevelopment or promoting unacceptable levels of car travel. Friockheim is one of these settlements and development is limited over the plan period to allow incremental development which can be absorbed without undermining the village's character. Increasing the number of units as proposed would increase the village by over 50% within the plan period.

The site south of Gardyne Street has a current consent and can come forward as the economic outlook improves as there is no reason to assume the allocation is not an effective housing site. See also responses to Chapter 3: Vision and Local Development Plan Strategy.

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan.

Main Issue: 0

Question: 44

Answer: No

Representation: 786/026

Organisation: Guild Homes

Representee: Mark Guild

Comment:

Guild Homes would hope that once they start development, Friockheim would sustain 10-15 houses sales per year. As such is is considered that the settlement can sustain 100-150 houses over the plan period. In order to enable development and meet the anticipated demand there is a need to release more than 5 units per year. Therefore, while Guild Homes is happy to accept a phased release of land over the life time of the plan, there needs to be flexibility in the numbers, and a greater overall allocation, to ensure that there is no restriction on development to meet the market demand within the village.

Response:

The MIR identifies four larger villages where small scale development sites which have the most significant number and range of services, have a relatively large resident population and where development could support existing services and provide a sustainable pattern of growth in the rural areas. The level of development proposed is deemed sufficient to maintain a healthy population without overdevelopment or promoting unacceptable levels of car travel. Friockheim is one of these settlements and development is limited over the plan period to allow incremental development which can be absorbed without undermining the village's character. Increasing the number of units as proposed would increase the village by over 50% within the plan period.

Recommendation:

No change. These representations will be considered in preparing the Proposed Plan.

Representation: 798/044

Main Issue:

Question: 44

Answer: No view

Organisation: Scottish Natural Heritage

Representee: Carolyn Deasley

Chapter 17 Letham

Main Issue: 0 **Question:** 0 **Answer:**

Representation: 916/017

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

SEPA note that the three allocations at Letham (two allocations at Dundee Street SW and one at West Hemming Street North) are located immediately to the north of an established chicken processing plant, which is regulated under the PPC regulations and this comprises two authorised activities - namely a chicken slaughtering process (PPC/E/20068) and energy from waste plant (EFW) (PPC/A/1003156). SEPA understand that although the EFW plant has planning and PPC authorisations, it is not yet built.

The planning authority should give consideration as to whether the proposed (housing) use is consistent/compatible with existing adjacent uses. For example, given the potential for residual odour from some sites, the Council should consider whether proposed uses are compatible with existing adjacent land uses, and whether adequate separation distances have been incorporated within the layout of the proposed development. Paragraph 217 of the SPP provides information on buffer zones. SEPA recognise that this information relates specifically to waste management facilities, but suggest it can be readily applied to other activities which may give rise to nuisance.

SEPA regulate operations on the adjacent employment site by means of a PPC permit. However, even with the use of best industrial practice, mitigation and odour abatement techniques, it is possible there may be a residual odour or other impacts such as noise, detected outwith the boundary of the facility. SEPA consider that a residual odour can be defined as odour detected at or beyond the site boundary that is deemed to be non-offensive by the attending SEPA officer. Such residual odour may not necessarily represent non-compliance with the site licence conditions relating to offensive odours and therefore cannot be controlled by SEPA.

The planning authority should give consideration as to whether a proposed adjacent land use would impact on or prevent activity on an existing regulated facility.

SEPA recommend then that if the housing site is brought forward to the Proposed Plan stage, the extent of housing development, including layout and any buffer strips, should respect the proximity of the established employment use to the south and that any housing development is then appropriately restricted such that potential nuisance detected within the housing site is minimised.

Representation: 916/078

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Letham Preferred (Housing & Employment) (Dundee Street SW)

Flood Risk:-

None Known at site.

Flood Risk would need to consider a small watercourse which appears to be culverted going though the area (in between the housing and employment land site).

Water Environment:-

Although wastewater treatment works has capacity, the receiving watercourse is at capacity in terms of receiving further discharges.

Representation: 916/079

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Letham Alternative

Flood Risk:-

None Known at site.

Flood Risk would need to consider a small watercourse which appears to be culverted going through the area to the north of the proposal. We understand that the extent of the boundary is uncertain.

Water Environment:-

Although wastewater treatment works has capacity, the receiving watercourse is at capacity in terms of receiving further discharges.

Response:

Comments noted. The Proposed ALDP policy framework and land allocations will be informed by a range of additional background information, including a Strategic Flood Risk Assessment which will ensure development does not take place in areas of known flood risk or contribute to flooding elsewhere. Detailed policies based amenity, environmental factors and flood risk framework will also be considered in drafting the Proposed Plan.

Recommendation:

No change to Preferred Option.

No settlement landscape and visual analysis is available and we recommend capacity work is undertaken. There is some potential for smaller scale development (proportionate to existing scale of settlement) to west.

Comments on alternative option 1: We agree it is difficult to reconcile this site with the backs of existing housing.

Response:

Comments noted, including support for the preferred option. The Proposed ALDP policy framework and land allocations will be informed by a Habitat Regulations Appraisal as required under the Conservation (Natural Habitats & c) Regulations 1994. In addition, the Proposed ALDP will be supported with an updated Landscape Capacity Study for Letham. Detailed policies based on landscape character will also be considered in drafting the Proposed Plan.

Recommendation:

No change to Preferred Option.

Chapter 18 Newtyle

Chapter 18 - General

Representation: 916/081

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Newtyle Preferred (Adjacent to Primary School)

Flood Risk:-

None known at site.

There may be some risk associated with the small watercourse which could be investigated.

Water Environment:-

Although wastewater treatment works has capacity, the receiving watercourse is at capacity in terms of receiving further discharges.

Representation: 916/082

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Newtyle Preferred (North Street)

Flood Risk:-

None known at site. No flood risk apparent.

Water Environment:-

Although wastewater treatment works has capacity, the receiving watercourse is at capacity in terms of receiving further discharges.

Representation: 916/080

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Newtyle Preferred (Coupar Angus Road)

Flood Risk:-

None known at site.

Flood risk would need to consider a small watercourse which appears to originate within part of the site (possible it is culverted). We understand that the extent of the boundary is uncertain.

Water Environment:-

Although wastewater treatment works has capacity, the receiving watercourse is at capacity in terms of receiving further discharges.

Representation: 916/083

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Newtyle Alternative 1

Flood Risk:-

None known at site.

SEPA understand that the extent of the boundary is uncertain, if it extends towards the east it may encroach into the floodplain of the Newtyle Burn. This could be investigated and avoided at a planning application stage.

Water Environment:-

Although wastewater treatment works has capacity, the receiving watercourse is at capacity in terms of receiving further discharges.

Representation: 916/084

Organisation: Scottish Environment Protection Agency

Representee: Alasdair Milne

Comment:

Newtyle Alternative 2

Flood Risk:-

None known at site.

Surface water runoff from the hill behind could be considered if this site is taken forward.

Water Environment:-

Although wastewater treatment works has capacity, the receiving watercourse is at capacity in terms of receiving further discharges.

Response:

Comments noted.

Recommendation:

A Strategic Flood Risk Assessment will be undertaken to support the site selection process in the preparation of the Proposed ALDP. Where appropriate, Drainage Impact Assessments will be required to support development proposals. A policy approach to flooding and drainage including SuDS will be set out in the Proposed ALDP. These representations will be considered in preparing the Proposed Plan.

Chapter 18 - Question 47 Do you agree with the preferred option for the development of land around Newtyle? Please give reasons for your answer and (if appropriate) describe any alternative option that you would prefer.

Main Issue: Question: 47 Answer: Yes

Representation: 875/001

Organisation: Newtyle and Eassie Community Council

Representee: Kathleen Band

Comment:

Newtyle and Eassie Community Council would like it to be noted that the preferred option for the development of land around Newtyle would be acceptable apart from the land adjacent to the primary school.

It was agreed at a meeting during the planning process before the new school was built, that any surplus land be given to the community for community use. Therefore, any other proposed use is contrary to what was previously agreed by representatives of Angus Council.

Representation: 874/010

Organisation: Kinpurnie Estate

Agents: Drivers Jonas Deloitte

Comment:

Kinpurnie Estate generally supports the direction of development proposed within the preferred option and within alternative option 2. Alternative option 1 is not supported. Comment is made below on the general principle for development around Newtyle and on the individual proposed sites.

The natural direction for development around Newtyle would be to the west, where the former railway line forms a strong, tree-lined, physical boundary to the settlement. This is noted in the Main Issues Report. To the east the landscape is relatively flat and no physical or other boundary exists. Development and growth of Newtyle in this easterly direction would be contrary to the policies in the existing Angus Local Plan Review and the SPP.

Kinpurnie Estate believes that the proposed Landscape Capacity Review will concur that Newtyle should extend westwards, utilising the disused railway as a new settlement boundary.

All three Main Issues Report options designate the sites at North Street (Kinpurnie Estate site) and the site adjacent to the primary school for housing. It is noted that the North Street site already has planning support for 36 units and a day care centre (Planning Committee, 10th November 2010, minded grant subject to agreement of a legal agreement, Planning Reference: 10/00008/FULL).

Kinpurnie Estate would draw the Council's attention to local opposition to the use of the land adjacent to the school for housing development (Reference 61S). The minutes from the Newtyle and Eassie Community Council meeting on 4th December 2012 state, "The excess ground at the school could still be earmarked for selling by Angus Council, possibly to a developer for housing. This is totally contrary to what was agreed at a public meeting which was held before the new school was built. At that meeting it was agreed that any excess land would be utilised for community use". In this context, it is considered inappropriate for this site to be designated for housing, particularly when there are a number of alternative sites which can deliver the required level of housing for Newtyle without sacrificing important local community resources.

The difference between the preferred option and the two alternative options is the location of the third housing allocation: 46S Coupar Angus Road (preferred); 41S Bulb Park (option 1); or 43S Dundee Road (option 2).

Given its location directly adjacent to the current settlement boundary and within the existing built-up area; and the surrounding land uses including the recent housing development immediately to the south, we consider that our client's site at North Street, Newtyle is an entirely appropriate and suitable candidate for further residential development within this important, and well located, South Angus settlement.

The approved SDP has outlined strategic policy support for further new housing in this location and SPP recommends meeting housing land requirements by extending existing rural settlements so that servicing costs can be reduced and local schools, shops and services can be sustained.

The site is not allocated for development within the currently Adopted Local Plan but has been zoned for development in the past. The ALDP Main Issues Report has also recognised its particular merits and advantages and included it as part of the first alternative option for housing land in the Newtyle area.

The site represents a natural extension to the existing settlement and would effectively round-off the village to the north east. It is well located in terms of access provision, existing community facilities and services, and education provision.

The site is not constrained by any environmental or landscape designations. It is level and regular with no technical constraints to its development. The site is generally south-facing and benefits from well-defined boundaries to the east, south and west and a number of potential access points. Like all land around Newtyle, the site is classed as prime quality agricultural land. However, the site is not in intensive agricultural use and its development for housing would not impact on the viability of any farm or land holding, or lead to the loss of land that is in short supply.

Due to the size of the site, a range of densities and house sizes could be provided with the development phased to provide a short, medium and longer term housing site for Newtyle. It is anticipated that the scale of development would be in keeping with the scale and character of the adjacent residential area (Bulb Park). The site can be readily absorbed into the local landscape and there are opportunities to address the weak northern boundary through additional landscaping and tree planting which would complement the robust landscape structure forming the site's west and south boundaries.

The site is an effective housing site and its allocation for housing is fully supported by the Trustees.

The site is well-defined and well located on one of the key roads in the village and would provide a natural expansion of Newtyle. It is accessible to existing services and community facilities and its development for a range of new housing would help to sustain and secure these important local services and make most effective use of the investment in key infrastructure. The release of the site would also provide choice and variety for house buyers in a settlement that has until recently been denied any significant new housing development.

The Church of Scotland General Trustees would therefore recommend that the full extent of the site is allocated for housing development in the new Local Development Plan.

Representation: 905/001

Representee: Mr and Mrs Greig

Comment:

Preferred option for land allocations

A major concern about the site proposed on Coupar Angus Road is road safety, in particular crossing the Dundee Road to get to ALL local Newtyle amenities (Bus Stop to Dundee/Shop and Post Office/Playground/Football pitches/Bowling/Butchers/School/Commercial Hotel).

The crossroads at Dundee Road, Coupar Angus Road and North Street can be a busy junction where the 3 roads meet and can have speeding traffic arriving and leaving the village. By increasing the housing on the Coupar Angus Road side of the village, this would increase the number of people trying to cross at this junction (either by foot/bicycle/vehicles). This would be the main crossing point to get to ALL local amenities AND to travel towards Dundee and would have a significant impact by such an increase in the number of houses. Some form of crossing would surely be required to be safe for all. The alternative option 1 would seem a more appropriate option to allow safer and easier access to all the amenities offered in the village without needing additional crossings.

2) "No significant impact on local landscape character".

A) The Newtyle Path Network is well used by both local people and walking groups from outside the village. The peacefulness of this walk with views across the fields would be impacted at the beginning and end of many of the local walks at the Water Backie and the Bannatyne Path.

B) The houses on Coupar Angus Road are mainly built along one side of the road and are of varying age and character. The character of this side of the village would be significantly changed by building new modern homes in such numbers. The alternative option 1 would seem a more appropriate option as this side of the village (on North Street) has already been developed with the building of newer modern homes.

C) The potential loss of natural habitat and a significant impact due to increased light and noise pollution for a variety of wildlife. Bats, Owls, Red squirrels, Hedgehogs and a wide variety of birdlife and other wildlife may be affected by the increase of housing in this area. These animals are seen and heard regularly in this area in particular in the nearby trees along Coupar Angus Road and Bannatyne Drive.

Representation: 872/001

Representee: Caroline Wilson

Comment:

Development of this land would change the character of this side of the village, it currently feels very rural, we are surrounded by beautiful countryside.

Negative impact of noise and light pollution on wildlife if this land is developed (bats and at least 2 red squirrels visit our garden, owls are heard very close to our house and deer have been seen on the railway embankment).

We live in a single storey house with a bedroom at the front, development of this land would mean we would lose our privacy as we would be overlooked.

I don't think Newtyle needs all the extra houses as proposed, it would change the overall character from a nice, quiet, friendly village to a small town and there are plenty of houses currently for sale in Newtyle which aren't selling. There is no demand for additional housing.

Representation: 873/001

Representee: Jonathan Berg

Comment:

The preferred option of building to the north side of Coupar Angus Road has a number of disadvantages that we feel are not clearly considered in the plan.

Nature and Built Heritage

The proposed development area to the north of Coupar Angus Road would have a major effect on the rural environment along the Coupar Angus Road. Currently this is an attractive aspect of the village, with a concentration of footpaths of the Newtyle Path Network. Views from the path network are currently to open fields. There are fewer than 10 houses between the railway bridge and the main village crossroads. Although the houses vary in style and quality, they are widely spaced and leaving the Coupar Angus Road field as agricultural land would allow this part of the village to retain its significant rural character.

Effect of Development on Village Approach and Path Network

This approach to the village will effectively become a road through a housing estate. Although a new development would have access to the footpath network, at the same time it would build around significant parts of the Railway path, Water Backie path and Bannatyne paths. These paths attract a number of visitors, who may not choose to walk through a new housing development instead of open fields. The development would devalue the path network by a considerable amount, and threaten one of the few tourist assets in the village. Allowing the path network to develop on this side of the village without building around it has the potential to increase tourist use of the village and support both shops and potentially development of a cafe. The existing Stone wall of Mundamalla actually provides an effective and attractive 'hard boundary' to the existing village on the north side of the road.

Effect on Wildlife

The Coupar Angus Road is an established rural environment. There are a number of significant trees, including valuable Ash trees that would be lost. Beech hedging, agricultural land and a significant amount of mature beetle bank and hedgerow would be lost. It is a site that has numerous sightings of red squirrels, woodpeckers, owls and bats. There is currently almost no light pollution, and the night time character of the area would be destroyed. Any development of this area would threaten a major wildlife reservoir for the surrounding area.

Accessibility

The development will cause a major increase to traffic along the Coupar Angus Road, that leads to a narrow junction with the main Dundee Road. An additional 50 houses would lead to potentially 200 or 300 journeys per day along a stretch of road that is currently used by less than 10 houses. Although there are means by which this could be mitigated, this would lead to an increased adverse effect, urbanising a significant stretch of road. Schoolchildren from the Coupar Angus Road side would need to cross the road to go to the school. This would theoretically lead to a requirement for an improved crossing and a crossing patrol in the mornings and afternoons, at a significant cost.

Ecologically Friendly Development and Desirability of Housing

The site to the north side of the road is overshadowed by the railway cutting to the north, mature trees and the Sidlaw Hills to the south. This causes a major limitation to the amount of natural light and solar gain that any houses on this site will have.

Alternatives

Although, as a resident of the Coupar Angus Road settlement of Newtyle, I would declare a vested interest in development being elsewhere in the village. I feel the views above are correct and argue against the preferred option. The alternative options presented are probably better from the point of view of built environment of the village.

Alternative option 1.

A number of arguments are in favour of alternative option 1. The area of proposed build is more open and agricultural. This provides for a more open outlook, and houses with better

possibilities for solar gain. The openness of the fields and smaller number of trees would lead to less damage to established environmental assets. Although the houses would be more visible from the northern approach, at the same time, there are already roads and houses established as a housing estate adjacent to the proposed site. The site would have easy access to the playground and a safer route to school.

Summary: alternative option 1 would provide for the housing development needs without significantly changing the character of the area developed, and would provide more satisfactory houses. Access to services and relative urbanisation would have a lower impact in this site than the preferred option. I would be happy to present my views in person to the Council, or take a walk around the areas concerned with Council representatives, if this would be helpful.

Response:

Comments noted. The Proposed ALDP will allocate land to accommodate 50 new houses in Newtyle in the period to 2026 in line with the Proposed ALDP strategy. The site assessment process will take account of issues including flood risk, drainage capacity, landscape impact, roads and access issues and the sites availability for development.

Recommendation:

Comments noted. These representations will be considered in preparing the Proposed Plan.

The Alternative Option outlined in response to Question 47, whereby the five sites owned and promoted by Kinpurnie Estates allocated in the forthcoming LDP for housing development, would constitute a more generous housing allocation, providing a choice of housing sites and housing types.

Response:

Comments noted. The Main Issues Report (2012) identified that around 50 new homes should be provided within the 10 year period of the Proposed ALDP to help maintain the local population and service provision within Newtyle.

Recommendation:

No change.
