

ANGUS COUNCIL

PLANNING AND TRANSPORT POLICY COMMITTEE

24 JANUARY 2002

**SUBJECT: FINALISED DUNDEE AND ANGUS STRUCTURE PLAN
STAGE 2 SUSTAINABILITY APPRAISAL**

REPORT BY DIRECTOR OF PLANNING AND TRANSPORT

<p>Abstract: This report summarises the key findings of the second stage of the Sustainability Appraisal and seeks agreement to include the Consultants' Report as supporting information to the Finalised Dundee and Angus Structure Plan.</p>
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1 RECOMMENDATION

It is recommended that the Committee:-

1. note the completion of the second stage of the Sustainability Appraisal;
2. agree that the Sustainability Appraisal be included as supporting information to the Finalised Dundee and Angus Structure Plan to be submitted to Scottish Ministers.

2 BACKGROUND

- 2.1 The Planning & Transport Policy Committee at their meeting of 26 April 2001 (report No. 484/01 refers) agreed to jointly commission with Dundee City Council a Sustainability Appraisal of the Dundee and Angus Structure Plan. Stage 1 of the Appraisal was undertaken as part of the process of finalising the Structure Plan and reported to Angus Council at the meeting of 13 December 2001 (report No. 1430/01 refers) when the Finalised Dundee and Angus Structure Plan was approved by the Council.
- 2.2 The second stage of the consultants commission was to undertake a follow up Sustainability Appraisal of the Finalised Structure Plan. Specifically this was designed to assess the changes made and responses to public consultation and Stage 1 of the Appraisal, and indicate where these changes have improved the sustainability impact of the Finalised Plan. This work has now been completed, and this report summarises the key findings.

3 INTEGRATION OF SUSTAINABILITY APPRAISAL INTO THE FINALISED DUNDEE AND ANGUS STRUCTURE PLAN

- 3.1 The Finalised Structure Plan has been re-appraised by the Consultants by:-
 - comparing each of the recommendations contained in the Stage 1 Sustainability Appraisal (June 2001) with the actual changes made and incorporated into the Finalised Plan;

- assessing each of the changes to determine whether they have met the recommendations and therefore made the Plan more sustainable;

3.2 The approach used by the Consultants has allowed a transparent assessment of the integration of the Sustainability Appraisal into the Finalised Plan. When considered alongside the Stage 1 Appraisal it also provides an assessment of the impact of the Plan's policies against the sustainability criteria which were originally identified.

Key Findings

3.3 The Consultants have recognised that the Councils viewed the appraisal as a positive process resulting in a large number of changes to the Plan which improve its impact on a range of sustainability criteria. The Appendix to this report gives a detailed comment by the Consultants on each of the responses to the Stage 1 Appraisal recommendations.

3.4 Changes incorporated in the Finalised Plan which improve its sustainability impact include:-

- revisions to the **Guiding Principles** to include a full range of sustainability criteria;
- improvements to employment policies to take account of **regeneration** (EP2);
- new policy to provide for **affordable and special needs housing** (HP6);
- **provision of housing land** is now in accordance with the development strategy which specifies that most new development will be accommodated within existing settlements (HP1, HP5);
- **provision of housing in Dundee** by a combination of mixed development on brownfield sites, favouring houses rather than flats and the Dundee Western Gateway development will be kept under close review and monitored to ensure it meets its stated aims;
- **the provision of employment land** now takes account of the need to use brownfield sites (EP2);
- strengthening of policies on **transport proposals** to take account of environmental issues (TP1, TP3);
- requiring **transport assessments and green travel plans** where developments will have significant transport impacts (DWG, TP3, TCRP4, TCRP5);
- ensuring that development takes place in areas most accessible by **public transport** (TP3);
- strengthened **protection for habitats and landscapes** (ERP1, ERP2, TP2);
- strengthened **protection for coastline** (ERP3);

- acknowledgement of the importance of the character and the quality of the **built environment and protection of open spaces** (ERP6);
- **protection for the historic environment** (ERP6);
- requiring recycled and secondary material to be considered when assessing **minerals requirements** (ERP9);
- encouraging development that supports **waste reduction and recycling** (ERP11);
- requiring that **waste management developments** take account of a range of social and environmental impacts (ERP11).

Consultants Conclusion

- 3.5 The Consultants conclude that Dundee City and Angus Councils have made a large number of changes to the Draft Plan which have integrated recommendations from the Sustainability Appraisal, and significantly improve the Finalised Structure Plan's performance against a range of sustainability criteria.
- 3.6 There are in addition a number of recommendations which the Councils have indicated will be considered as part of the Local Plan review process, and which have the potential to improve the sustainability impact of those Plans.
- 3.7 The Consultants detailed comments on each of the changes, are included in the attached Appendix 1 to this report.

4 FINANCIAL IMPLICATIONS

- 4.1 A contribution of up to £5,000 by Angus Council toward undertaking the Sustainability Appraisal was agreed by the Planning & Transport Policy Committee at their meeting of 26 April 2001 (report No. 484/01 refers). The total cost of both stages of the Consultancy Study falls within the budget set for this work and Angus Council's share can be contained within the Planning & Transport Department's 2001/02 revenue budget.

5 HUMAN RIGHTS IMPLICATIONS

- 5.1 There are no Human Rights implications arising from this report.

6 CONSULTATION

- 6.1 The Chief Executive, Director of Finance and Director of Law & Administration have been consulted in the preparation of this report. Close liaison is also continuing with Dundee City Council's Director of Planning & Transportation.

7 CONCLUSION

- 7.1 The Sustainability Appraisal has demonstrated that the effectiveness of the Dundee and Angus Structure Plan in pursuing sustainability aims and objectives has been substantially improved as a result of the changes made during the process of finalising the Structure Plan.

- 7.2 The Consultants' comments as part of the second stage of the Sustainability Appraisal also recognise the terms of the Council's response to the first stage as set out in the Finalised Report of Survey. This includes some recommendations arising from the first stage of the Appraisal which it is considered relate more appropriately to other plans and strategies (e.g. Local Plan, Local Agenda 21) rather than the Structure Plan.

NOTE

No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973, (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above Report.

AA/GDP/KW
16 January 2002

Alex Anderson
Director of Planning and Transport

Appendix
Sustainability Appraisal of the Dundee and Angus Structure Plan
Comments on Integration of Appraisal into Finalised Plan

Schedule of Policy Abbreviations Used by CAG in our comments

EP: Encouraging Employment Policy

ERP: Environmental Resources Policy

HP: Housing and Communities Policy

IP: Implementation Policy

TCRP: Town Centres and Retailing Policy

DWG: Dundee Western Gateway

TP: Transport and Travel Policy

*Numbers following these abbreviations refer to policy and paragraph numbers contained in Draft Finalised Written Statement., although the Dundee and Angus comments refer to policy and paragraph numbers in the Draft Written Statement

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
Recommendation No 1 Revised Guiding Principles			
Minor amendments to existing principles and addition of some new principles.	Generally accepted.	Guiding Principles in Finalised Plan revised generally in line with recommendations with some additional amendments.	Almost all the appraisal comments have now been included in the Guiding Principles, except references to countryside access and community safety. The new Guiding Principles provide an effective overall sustainability framework for the Plan. objectives.

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
Recommendation No 2 Strengthened or New Policies for Economy and Employment			
Require LPs to support small local enterprises, for example by allowing conversions and extensions.	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	No Change.	EP7 will support small local enterprises in rural areas, where the issue is most pressing. Therefore accept the decision not to give additional direction to Local Plans.
Take account of the need to regenerate disadvantaged areas EP1, EP4	Accepted.	Changes made to Employment Policy 1 in a comprehensive restructuring recognises need to regenerate disadvantaged areas.	Agree: now dealt with in new EP2.
Encourage LPs to promote local employment and training agreements for workers needing to retrain, the long-term unemployed, women returners and the disabled . EP2, IP1	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	No Change.	Accept the decision not to deal with this issue in the Structure Plan. However, training and employment is an important sustainability issue and recommend that Local Plans take this on board. It is also noted that planning agreements (dealt with in IP1) could provide employment and training agreements, and IP1 or text could easily incorporate this issue.

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
Promote rural diversification. EP4	Accepted.	Reference to diversification of the rural economy included in the Development Strategy. Rural Employment Policy now makes clearer promotion of Rural Diversification.	Agree
Require LPs to take account of the land use implications of plans for economic diversification by relevant Economic Development Strategies.	accepted.	Text amendments have been incorporated into paragraph 3.7 to take account of this.	Agree
Encourage LPs when undertaking environmental protection and improvements to target disadvantaged areas and groups and to promote use of local labour ERP5, ERP6	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	Will be taken forward by development briefs for sites required in Employment Policy 1 and in Local Plans.	Development briefs will not necessarily deal with the issue. However, accept the decision not to deal with this issue specifically in the Structure Plan, and pleased to see that Local Plans will deal with it.
Recommendation No 3 Strengthened or New Policies for Housing and Community			
Ensure that housing provision takes account of the needs for affordable housing, and the special needs of the elderly and the disabled.	Accepted.	New Section and Policy added to Plan.	New policy HP6 improves sustainability of the Plan.

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
It should take account of Dundee and Angus Housing Strategies HP2, HP4			
Require LPs to set standards for access to community facilities, including open space, transport services, educational facilities and special needs (based on the size of the community), identify deficiencies in provision, identify suitable sites, and encourage development. Community involvement in identifying local needs should be encouraged.	The standards for access would vary considerably over the Structure Plan Area therefore such standards should be dealt with in a more specific manner by Local Plans or Local Transport Strategy etc.	No change.	Agree that standards would vary across area. However this does not preclude setting standards for different areas. Provision and protection of local facilities is an important element of sustainable development, one of the Plan's guiding principles, and identified as an important issue for rural Angus. TCRP6 already provides support for rural shops, but other facilities such as schools, post offices, public houses and medical services are also important. Note also that text in 4.20 indicates that Local Plans will consider the need for new community facilities as a result of new building. Recommend that the coming reviews of Local Plans address the wider issue of access to facilities for existing community safety.
Require LPs to promote community safety (e.g. by setting design standards).	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	No change.	Community Safety is the one issue included in the original sustainability criteria that is not dealt with directly by the Structure Plan in any way. Accept the judgement that this be dealt with at Local Plan level.

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
Require LPs to ensure that specific developments take account of community safety EP1-3, DWG, TCRP1-5	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	No change.	See previous comment.
Require LPs to consider the needs of disabled people (e.g. in design standards for renovations).	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	No change.	Accept the judgement that this should be dealt with at Local Plan level. However access is an important sustainability issue, and access for disabled people a legal requirement (which is included in relation to transport in TP3)
Require developments likely to generate significant trips to include Transport Assessments to minimise safety and severance impacts. EP1, DWG, TCRP4,5, TP2,3	It is intended that this will be covered in the Dundee Western Gateway Concept Plan. Agree that relevant Town Centres and Retailing Policies should reflect this requirement.	Dundee Western Gateway Concept Plan incorporated in Report of Survey. Town Centres and Retailing Policies 4 and 5 incorporate requirement for proposals to be supported by Transport Assessments where appropriate. Transport Policy 3 incorporates a statement on Transport Assessments and Green Transport Plans.	Agree that DWG Concept Plan, TCRP 4 & 5 and TP4 (previously TP3) provide for Transport Assessments. Individual assessments should be adequately appraised to ensure that they consider an appropriate range of traffic impacts, including safety and severance.

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
Require LPs to ensure that development proposals protect and enhance community facilities and avoid severance EP1-3, DWG, TCRP1-5	Covered in part in Dundee Western Gateway Concept Plan – Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	Dundee Western Gateway Concept Plan incorporated in Report of Survey.	Agree that DWG covers this. It also provides a model of how this issue could be dealt with for other developments. Note that ERP6 provides protection for open spaces. Still believe that the Structure Plan should emphasise the importance of protecting community facilities, but accept that this can be achieved through coming Local Plan reviews.
Recommendation No 4 Strengthened or New Policies to Preserve Energy, Water and Mineral Resources			
Require LPs to promote development that is energy efficient. Advice on energy conservation should be included in design standards for all buildings.	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	No change.	The efficient use of energy has been accepted as a Guiding Principle for the Plan, and a Scottish Office Research Report: Energy Conservation and Planning has suggested specific approaches. Accept the judgement that detail is best dealt with at Local Plan level, however still believe that the Structure Plan could provide overall guidance on this key sustainability issue.
Require LPs to encourage specific new developments to be energy efficient. EP1-3, DWG	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	No change.	See previous comments.

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
Encourage LPs to support use of 'Quality of Life Capital' or similar methodologies to explore the full range of potential impacts of renewable energy proposals. ERP10	'Quality of Life Capital' methodology unsupported in this context.	Environmental Resources Policy 10 establishes that Local Plans will set out a detailed criteria based policy, locational guidance and, where appropriate, areas of search for individual sources of renewable energy.	It is not necessary that the Quality of Life Capital methodology be used, however it does a way of considering a complex range of impacts. Agree that ERP10 now addresses the issue.
Support energy generation from waste, where this is appropriate in the waste hierarchy and consistent with other aspects of sustainability. ERP11	Supported.	Addressed in Environmental Resources Policy 11 and in paragraphs 7.37 and 7.38.	Agree, although it is not specifically mentioned as an option in ERP11
Specify that new mineral extraction will only be allowed if demand for minerals cannot realistically be satisfied from recycled materials and from existing extraction activities. ERP9	Supported.	Addressed in Environmental Resources Policy 9 and in paragraph 7.32.	Agree
Require LPs to promote facilities handling recycled and secondary aggregates.	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue.	No change.	ERP9 and text in 7.32 encourages the use of recycled aggregates. Direction to Local Plans would have provided a more proactive approach, but accept that this can be dealt with in the Local Plan

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
	Duplication of existing National Guidance contained within NPPGs and PANs.		reviews.
Require LPs to promote development that conserves water, and include best practice in the design standards for developments.	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	No change.	Accept the judgement that this is best dealt with at a Local Plan level.
Recommendation No 5 Strengthened or New Policies to Preserve Land			
Clarify that the main aim is to provide housing within existing settlements. HP1	Accepted in part. Development Strategy focuses development on existing settlements. Housing Policy 1 requires conformity with development strategy.	Housing Policy 1 not changed in respect of this comment. Specific text included in Housing Policy 5-Housing in the Countryside, which reflects comment.	Agree
Require Dundee LP to undertake monitoring of the impacts of the policy and review regularly. Issues that should be considered are amount of greenfield land take, and impact on; population loss, travel	Need for monitoring of approach accepted.	Text regarding review of housing led approach to addressing population and housing issues in Dundee added to 'Dundee and South Angus Housing Market Area' section.	Referred to in the text in the end of 4.26. Adequate and regular monitoring and review is crucial for this issue which more than any other will influence the future sustainability of Dundee. 4.26 also notes that the details of the strategies will be enacted through the Dundee Local Plan and it is appropriate that this includes arrangements for monitoring and review.

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
<p>patterns, vitality of the city centre, and disadvantaged areas (particularly those where the pre 1919 tenement properties are located). The LP should endeavour to use less than the maximum numbers of greenfield allocations allowed outside of Western Gateway. HP2</p>			
<p>Ensure that the “appropriate policy framework” for promotion of houses rather than flats undertakes appropriate studies to determine the local demand and keep it under review. HP2</p>	<p>Need for monitoring of approach accepted.</p>	<p>Text regarding review of housing led approach to addressing population and housing issues in Dundee added to ‘Dundee and South Angus Housing Market Area’ section.</p>	<p>See comment above.</p>
<p>Require the Angus LP to adopt the sequential approach to the provision of housing land, to maximise opportunities</p>	<p>Housing land encouraged to existing settlements as a priority. Local Plan process will address such matters.</p>	<p>No change.</p>	<p>Agree that the Plan encourages housing land in existing settlements. HP2 and HP4 also give priority to brownfield sites. However there will still be considerable greenfield land take as a result, including</p>

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
for conversions and windfalls ¹ , to undertake urban capacity studies where appropriate, to consider whether it is appropriate to renew existing planning permissions over 5 years old, and to keep vacancy rates under review. HP2,4			47%, 41% and 62 % of the effective land supply respectively for Arbroath, Forfar/Kirriemuir/Angus Glens and Montrose/Brechin. Still believe that the recommendations made would provide stronger protection for greenfield sites, but accept that this will be dealt with through the Local Plan. Also note that HP1 now directs that where there is a shortfall, the established land supply and new brownfield sites (ie windfall sites) will be considered in the first instance.
Ensure that employment land allocations give priority to the use of brownfield sites. EP1	Accepted.	Changes made to Employment Policy 1 in a comprehensive restructuring takes into account the importance of the contribution of brownfield sites.	Agree that policies have now been strengthened; new EP2 and text in 3.8 recognise the importance of brownfield sites.
Encourage LPs to advocate use of 'Quality of Life Capital', or similar methodologies, to explore the full impact of specific development proposals involving prime agricultural land. ERP7	'Quality of Life Capital' methodology unsupported in this context. Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue.	No change.	The purpose of our comment was to indicate that there may be some situations in which it is more sustainable to develop prime agricultural land. The wording of ERP7 recognises this. Methodologies such as Quality of Life Capital provide a way of comparing the agricultural value of the land with its value for other uses, and therefore assessing when development is sustainable.

¹ As defined in PPG3: "previously- developed sites that have unexpectedly become available"

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Recommendation No 6 Strengthened and New Policies to Reduce Climate Change and Polluting Emissions			
Ensure that Transport policies refer to the objectives of the Local Transport Strategies and to related traffic reduction targets under the Road Traffic Reduction Act. TP1-3	The input of Local Transport Strategies and Local Plans are highlighted in a number of paragraphs, policies and proposals in the Transport and Travel Chapter but not expanded upon as not justified as a strategic issue.	Transport Policy 1 now refers to the objectives of the Local Transport Strategy whilst Transport Proposal 2 and Transport Policy 2 have been expanded to take account of environmental impact.	Agree. The text and TP1, Transport Proposal 2 and new TP3 (previously TP2) have been strengthened to ensure that sustainability issues are considered in developing transport infrastructure.
Require Transport Assessments, where developments will have significant transport implications. TP2,3, EP1, DWG, TCRP4,5	Noted.	This requirement is addressed in the Dundee Western Gateway Concept Plan. Town Centres and Retailing Policies 4 and 5 to incorporate requirement for proposals to be supported by Transport Assessments and Green Transport Plans where appropriate. Transport Policy 3 incorporates statement on Transport Assessments and Green Transport Plans.	Agree that plan has been significantly strengthened by incorporating Transport Assessments in the policies quoted.

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
<p>Require that large trip generating employment proposals produce a green transport plan. TP2,3, EP1, DWG, TCRP4,5</p>	<p>Noted.</p>	<p>This requirement is addressed in the Dundee Western Gateway Concept Plan. Major changes made to Employment Policy 1 in a comprehensive restructuring which recognises the importance of accessibility. Specific requirements for Green Transport Plans will be addressed in Local Plans. Town Centres and Retailing Policies 4 and 5 incorporate requirement for proposals to be supported by Transport Assessments and Green Transport Plans where appropriate. Transport Policy 3 incorporates statement on Transport Assessments and Green Transport Plans.</p>	<p>Agree that the plan has been significantly strengthened as described. It is appropriate that the specific requirements for Green Transport Plans be dealt with in Local Plans.</p>

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
Require LPs to establish public transport accessibility profiles, and to direct large trip generating developments into the most accessible zones. TP2-3	Dundee Local Plan unlikely to establish a public transport accessibility profile due to its urban nature. The suitability of establishing public transport accessibility profiles in Angus will be considered at the time of the Angus Local Plan Review.	Transport Policy 3 indicates that Local Plans will seek to ensure that development takes place in the most accessible locations.	Agree that TP4 (previously TP3) has been strengthened to promote accessibility. The purpose of public transport accessibility profiles is to establish the most appropriate sites for development, so they are a way for Local Plans to meet the requirements of TP4.
Require LPs to consider traffic demand and management measures such as park and ride and traffic calming. TRP2-3	Concept supported. Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	Answers to transport difficulties require localised consideration and will be identified through the Local Plan / Local Transport Strategy processes as appropriate. Para 6.14 has been expanded to highlight the role of Local Transport Strategies and Local Plans in implementing traffic measures.	Agree. Text in 6.16 (previously 6.14) indicates that such measures will be implemented through Local Plans and Local Transport Strategies.
Require LPs to identify sites susceptible to ground and surface water pollution, and to guide potentially polluting developments away from these sites.	Broadly supported.	Endorsed by Environmental Resources Policy 4 and paragraph 7.19 and Environmental resources Policy 11.	Partly agree. Policies listed deal with pollution from drainage and waste management facilities, and ERP6 deals with contaminated land, but broader issue of pollution from other sources not addressed. Local Plans should consider the advice of SEPA on whether there are "circumstances where existing or potential sources of pollution, and the application of environmental protection regimes , could

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
			have significant implications for the long term land use planning framework for the area". ²
Require LPs to identify where developer contributions will be required to the provision of public transport services. IP1	Structure Plan direction to Local Plans inappropriate and item not justified as a strategic issue. Duplication of existing National Guidance contained within NPPGs and PANs.	No change.	IP1 effectively covers this, although transport services are not specifically referred to.
Recommendation No 7 Strengthened and New Policies to Protect Habitats and Landscapes			
Ensure that developments, including transport infrastructure and forestry, take account of the protection of habitats and landscapes. EP1-4, HP2-4, DWG, TCRP4,5, ERP8, TP1-3	Supported.	This underlying principle is promoted within Environmental Resources Policy 2 and paragraphs 7.12 and 7.13. Transport Proposal 2 and Transport Policy 2 have been expanded to take account of environmental impact. Text reference has also been included in the Housing and Communities Chapter in relation to housing development.	Agree that ERP2 has been significantly improved to strengthen protection for habitats and landscapes. Other references also provide increased protection.

² PAN51 *Planning and Environmental Protection*, The Scottish Office March 1997.

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Ensure that the wildlife value of brownfield sites is assessed prior to consideration of development proposals. EP1, HP2,4	Broadly supported.	<p>Inherent within the provisions of Environmental Resources Policy 2.</p> <p>Text reference has also been included in the Housing and Communities Chapter in relation to housing development.</p> <p>Text reference has been included so that Employment sites will be considered further through the Local Plans.</p>	Agree that this is inherent within new provisions.
Include protection for designated and regionally important landscapes (ERP 2)	Supported.	Environmental Resources Policy 1 has been broadened in scope so that it relates to all natural heritage designations, including regionally important landscapes.	Agree that ERP1 has been significantly strengthened. Report of survey includes landscape designation in list of natural heritage designations.
Require LPs to take account of Landscape Character Assessment (ERP2, ERP8)	Supported.	Environmental Resources Policy 2 and para 7.12 now provide direction for Local Plans to take account of the Tayside Landscape Character Assessment 1999.	Agree; significantly strengthens protection of landscape character.

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
Ensure that coastal developments are consistent with shoreline management plans, and that the character of the developed coast is not adversely affected by the cumulative impact of development (ERP3)	Supported.	This is taken forward in Environmental Resources Policy 3. The issue of cumulative impact is also addressed by ensuring that new development within the developed coast is consistent with policies elsewhere in the Plan.	Agree that ERP3 strengthens protection for coastline. The development framework established by local plans should address the issue of cumulative impact of development.
Strengthen policy on nature conservation to indicate 'a presumption against inappropriate development', to reflect more clearly the hierarchy of importance of nature conservation sites, and to require Local Plans to follow the provisions of the LBAPs (ERP1)	Broadly supported.	Broadly addressed through Environmental Resources Policy 1. Modified Environmental Resources Policy 2 provides sufficient direction for Local Plans to take account of Local Biodiversity Action Plans.	Agree that ERP1 provides more protection than previously, and that ERP2 ensures that Local Plans take account of local Biodiversity Action Plans. It is understood that the wording in ERP1 for international and national designations is based on guidance in NPPG14. However, we feel that the NPPG guidance does not provide sufficient protection. We are concerned that the policy is written to allow development rather than protect sites, and could result in gradual loss of heritage value. We believe that where there is risk of damage to designated sites, planning conditions should be considered to protect nature conservation interests. In addition, the no net loss principle should be applied, which would require any habitat lost to be replaced elsewhere. We are also concerned that the test for exceptional

Appraisal Recommendation	Dundee and Angus Comments on Recommendation	Alteration to Finalised Plan (Dundee and Angus Comments)	CAG Consultants Comment
			development is not robust enough for regional and local designations.
Ensure that measures designed to improve one aspect of sustainability are also consistent with other aspects (e.g. are flood protection measures consistent with landscape character etc?) (ERP4, ERP6, ERP7, ERP9, ERP10)	Supported.	Connectivity of sustainability objectives has been improved by a range of modifications to the Environmental Resources Chapter.	Agree
Recommendation No 8 Strengthened and New Policies on the Built Environment			
Require LPs to prepare design standards to ensure that new and refurbished developments are consistent with local character. ERP6	Not seen as a strategic planning issue. Modified Environmental Resources Policy 6 (Conserving and Enhancing the Built and Historic Environment) provides sufficient direction for Local Plans in this context.	No change.	Agree that ERP6 gives a strategic overview to the protection of local character, and that it is appropriate for the detail to be dealt with by Local Plans.
Ensure that specific developments take account of design issues. EP1-3, DWG, TCRP1-5	Accepted. To be further addressed in appropriate Local Plans.	Housing and Communities Chapter now makes specific reference to guidance for Local Plans in allocating sites for housing including the importance of design.	Agree Specific direction included in text in 4.20.

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		Broadly covered in Dundee Western Gateway Concept Plan. Reference also include in para 3.11 before Employment Policy 3.	
Require LPs to safeguard archaeological resources. ERP6	Supported.	Environmental Resources Policy 6 provides direction for Local Plans in this context.	Agree. Report of Survey includes archaeological resources within the Historic Environment
Ensure that specific developments protect heritage and archaeological resources. EP1-3, DWG, TCRP1-5	Accepted. In general more appropriate Local Plan issue.	Housing and Communities Chapter now makes specific reference to guidance for Local Plans in allocating sites for housing including the importance of design. Broadly covered in Dundee Western Gateway Concept Plan.	Agree. ERP6 now provides direction to Local Plans to ensure protection.
Recommendation No 9 Strengthened and New Policies waste policies			
Promote a move up the waste hierarchy, away from 'disposal' and towards 'minimise use - reuse - recycle' (ERP11)	Broadly supported.	Environmental Resources Policy 11 and paragraphs 7.38 and 7.39 emphasise the role of the Tayside Area Waste Plan in establishing a local strategy for waste management, incorporating the Best	Accept that this will be promoted within the Tayside Area Waste Plan. It is also noted that ERP11 now requires Local Plans to encourage development that supports waste reduction and recycling.

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		Practicable Environmental Option (BPEO) for Tayside. The emphasis of the Tayside Area Waste Plan will be placed on waste minimisation, reduction and recycling.	
Reduce the quantities of inert waste going to landfill by supporting facilities for the reuse and recycling of construction materials (ERP9)	Broadly supported.	Environmental Resources Policy 9 and paragraph 7.32 encourage the recycling of mineral waste and use of secondary material.	Agree.
Ensure that all the environmental and social impacts of waste management developments are considered, including the impact on LBAPs, LCAs, air quality, water quality, climate change and so on (ERP11)	Supported.	This has been addressed in modified Environmental Resources Policy 10 by the inclusion of specific criteria, and more generally through Environmental Resources Policy 2.	Agree
Ensure that where appropriate new developments include recycling facilities. EP1-3, TCRP1-5, DWG, ERP11	Supported. In general more appropriate Local Plan issue.	This is addressed in Environmental Resources Policy 11. This issue will also be picked up at more detailed planning stages i.e. through Development Briefs.	Agree. ERP11 now provides appropriate direction to Local Plans.

