



**PERTH &
KINROSS
COUNCIL**

Post Adoption Statement

**Perth & Kinross Structure Plan 2003: Alteration –
Population & Households**





Section 1: Cover Note

- 1.1 Name of Responsible Authority** Perth & Kinross Council
- 1.2 Title of Plan, Programme or Strategy** Perth & Kinross Structure Plan 2003: Alteration – Population & Households
- 1.3 Contact Name** Graham Esson
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Signature

Date 31 March 2010



Section 2: Key Facts

2.1	Responsible Authority	Perth & Kinross Council
2.2	Title of PPS	Perth & Kinross Structure Plan 2003: Alteration – Population & Households
2.3	Purpose of PPS	The purpose of the Alteration is to update the section of the Perth & Kinross Structure Plan 2203 relating to population projections and housing land allocations
2.4	What prompted the PPS?	Legislative requirement
2.5	Subject	Housing
2.6	Period Covered by PPS	Period to 2020
2.7	Frequency of Updates	The next review will be undertaken through the Strategic Development Plan which will be updated every 5 years.
2.8	Area covered by PPS	5286km ²
2.9	Map Included?	Yes
2.10	Summary of nature/content of PPS	<p>The purpose of the Perth & Kinross Structure Plan is to give broad strategic land use planning guidance to 2020. The Structure Plan allocates housing land across the Plan area in order to meet needs while promoting a sustainable pattern of development. The Structure Plan housing land allocation was based on 3% population growth. However, the latest population projections suggest that the population of Perth and Kinross will increase by 6% to 2024. The purpose of the Alteration (guidance) is to update population and housing figures in the light of revised GROS projections and to provide interim guidance on housing land requirements until the Strategic Development Plan becomes operative.</p>
2.11	Update	<p>The draft Alteration was published for comment. However, Scottish Government Planners subsequently advised that the Alteration could not progressed due to the transitional arrangements which came into effect on 28 February 2009. However, it was acknowledged that there was a need to</p>



provide up-to-date guidance and as a consequence an alternative course of action of publishing the Alteration as Council approved Policy Guidance. The Guidance would be read in conjunction with the Perth & Kinross Structure Plan 2003 which would remain the approved Structure Plan for the area until it is replaced by the SDP.

Converting the Alteration to Policy Guidance has meant the text which the Council previously approved has had to be rewritten to make it clear that it is no longer an Alteration to the Structure Plan but is additional guidance to be read in conjunction with the Plan. It is recognised that the Policy Guidance will have less weight than a formal Alteration approved by the Scottish Ministers but it will assist in decision-making by the Council.

Given that the Alteration has been through a consultation process every effort has been made to continue to take on board as many of the comments received on the Alteration as appropriate. However some changes which were made to the Alteration in response to comments received have had to be omitted from the Guidance, for example, changes to the wording of existing Structure Plan policies and the inclusion of new policies. The proposed Policy Guidance can be found at Appendix 1. An update to the Report of Survey has also been prepared. This is very similar to the version considered by Council on 24 June 2009 – amendments are of a minor nature to reflect the change from formal Structure Plan Alteration to Policy Guidance.

In light of the above, it is considered appropriate to complete the requirements of the Environmental Assessment (Scotland) Act 2005 and complete the Post Adoption Statement, submit it to the consultation authorities, publish it and advertise its publication.

2.12 Date Adopted

24 February 2010



Section 3: Introduction

This document (the post-adoption statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

Introduction

The Perth & Kinross Structure Plan 2003: Alteration – Population & Households (the Structure Plan Alteration) and as a consequence the guidelines has been subject to environmental assessment, as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Taking account of the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Historic Scotland with regard to the scope and level of detail appropriate for the Environmental Report.
- Preparing an Environmental Report on the likely significant effects on the environment of the draft Alteration, which included consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the Alteration and other relevant strategies, policies, plans, programmes and environmental protection objectives;
 - existing environmental problems affecting the PPS;
 - the Alteration's likely significant effects on the environment, both positive and negative;
 - the mitigation measures envisaged for the protection, reduction and offsetting of any significant adverse effects;
 - an outline of the reasons for selecting the alternative chosen;
 - monitoring measures to ensue that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the environmental report.
- Taking into account the environmental report and the results of consultation in preparing the Guidance.
- Committing to monitor the significant environmental effects of the implementation of the Guidance, identify any unforeseen significant environmental effects and to take appropriate remedial action or enhancement.

Consultation on the Environmental Report was undertaken in parallel with the draft Structure Plan Alteration. Both the draft Structure Plan Alteration and the accompanying Environmental Report were available online and at Council premises. The consultation period ran for a 10 week period (19 December 2008 until 28 February 2009).

The Guidance together with the Environmental Report and Post-Adoption Statement can be inspected free of charge during normal opening hours at:

Pullar House
35 Kinnoull Street
Perth
PH1 5GD

or on the web <http://www.pkc.gov.uk>.

Section 4: Response to Environmental Issues

The table below recaps the environmental problems and issues identified in the Environmental Report as being of relevance for the Structure Plan Alteration and is updated to take account of additional issues identified through the consultation.

The majority of the implications of the potential problems and issues listed will either require to be addressed in detail at the Local Development Plan level or are already addressed by existing Structure Plan policies rather than through this Structure Plan Alteration on population and households. However in terms of the Structure Plan Alteration these potential problem / issues had to be taken into account in the assessment of whether individual planning areas have the environmental capacity to be able to accommodate in full the housing land requirement arising in that area. How these issues have been taken into account is summarised in the table below.

Topic	Problems & Issues and Relevance for Structure Plan Alteration	How they have been taken into account
Biodiversity, flora & fauna	<p>Impact on biodiversity, including habitat networks and wildlife corridors as well as designated sites and non-protected biodiversity, of increasing demand for development. The potential decline of biodiversity and associated habitats is a key issue for Perth & Kinross, not just for designated sites (including woodlands) but the loss of habitats and species as a result of inappropriate / poorly implemented development.</p> <p>Impact of increased pressure for inappropriate development on designated sites and buildings including ancient and semi-natural woodlands. Environmentally sensitive areas with biodiversity interests should be protected. There may also be significant effects from development on locally valued landscapes and wildlife sites.</p> <p>Consideration will need to be given to indirect effects such as disturbance, sedimentation and nutrient enrichment in watercourses / waterbodies such as the River Tay SAC and Dunkeld-Blairgowrie Lochs SAC.</p> <p>Potential for disturbance to birds from increased development pressure at Loch Leven Structure Plan Alteration and Ramsar site and the Firth of Tay and Eden Estuary SAC, Structure Plan Alteration and Ramsar site. Increased usage of these areas could affect these sensitive natural heritage interests. Where there are potential significant effects on Natura sites these will be required to be subject to an Appropriate Assessment.</p> <p>Threat from alien species</p> <p>The statutory duty on all public bodies to further the conservation of biodiversity (refer the Scottish Biodiversity List)</p>	<p>The potential for adverse environmental impact arising from increased levels of development is recognised in the guidance and has resulted in the reallocation of 10% of the Kinross Area housing land requirement to the Perth Area where there are more opportunities to accommodation additional development without having significant environmental impact.</p> <p>The Structure Plan Policies 5 (relating to the Perth Core Area), 6 (Lowland Area) and 7 (Upland Area) state that housing allocations will be subject to impacts on the environment being acceptable.</p>



Topic	Problems & Issues and Relevance for Structure Plan Alteration	How they have been taken into account
Population & human health	<p>Significant increase in population projected across Perth and Kinross – National Planning Policy requires that provision is made to meet the housing land requirement in each area in full although if there are environmental constraints in any particular area which make this difficult the Authority may consider reallocating some of the requirement to another area.</p> <p>Increasingly ageing population means there will be a need to take into account the scope for the provision of an increased level of services and facilities for elderly people and the need for new development to be directed to areas which are accessible by a range of modes of transport. A related issue identified by TACTRAN is that of increasingly high accessibility expectations from former car-owning elderly people which exceed that provided by public transport.</p> <p>Ease of access to employment, education and essential services, particularly healthcare and retail. The increasing centralisation of services in the largest settlements is an issue particularly for those groups in society who are without access to a car. These groups include: young people, elderly people, and the remaining members of single car owning households then the car is being used.</p> <p>Whilst access by car is currently good there are peak period congestion issues on major routes and at key junctions and the Structure Plan Alteration will need to take account of this in the allocation of the housing land requirement to individual areas.</p> <p>New housing development can also contribute to improving the quality of existing green and open space and the ease by which people living in new housing can access this and the wider countryside needs to be taken into account.</p> <p>High levels of affordable housing need across Perth & Kinross</p>	<p>The Guidance seeks to accommodate in full the need for new housing arising from the projected population increase</p> <p>The necessity for new development sites to be accessible by sustainable modes of transport is highlighted in Policy 5.</p> <p>All housing allocations are to be subject to the provision of infrastructure.</p> <p>The mapping of strategic sensitivities in relation to the infrastructure network through the SEA process helped determine the environmental capacity of each HMA to accommodate the need for new housing arising in that area.</p> <p>The Structure Plan Policy 3 aims specifically to secure an adequate level of provision of affordable and low-cost housing in local areas.</p>
Soil	<p>Irreversible loss of soil through development, contamination or erosion – the best quality agricultural land should be protected from development.</p>	<p>In allocating land for development a key objective identified in the Guidance is allowing for the contribution of brownfield / windfall sites to reduce the allocation of Greenfield land and to protect the best quality agricultural land from development. A specific contribution for windfall is included in the calculation of the additional land allocations in each housing market area</p>



Topic	Problems & Issues and Relevance for Structure Plan Alteration	How they have been taken into account
Soil	<p>Some areas of brownfield land may be available for re-development although there are limited brownfield opportunities in Perth & Kinross. Those brownfield sites which are available may have contamination issues. Positive effects of the Structure Plan Alteration may result from promoting the development of brownfield / derelict land through remediation of contaminated land and avoidance of greenfield land.</p> <p>Runoff from roads comprising rubber particles, oil and from winter gritting. Increasing demand for parking areas giving rise to more hard surfaces with implications for increased levels of surface runoff.</p>	
Water	<p>Impact of development on quality of watercourses and waterbodies</p> <p>Constraints surrounding the River Tay SAC</p> <p>Development pressure along watercourses and within floodplains and the need for sustainable flood alleviation schemes.</p> <p>Eutrophication of lochs and a deterioration in the condition of some lochs including Loch Leven and the Lunan Valley Lochs which are also European wildlife sites. The need to protect such areas from adverse impacts will have a major influence on the ability of some planning areas (Kinross, Eastern and Highland) to accommodate the housing land requirement arising in these areas in full.</p> <p>The spread of non-native and invasive species along watercourses is an issue in Perth & Kinross</p> <p>Drainage constraints in some parts of Perth & Kinross and large parts of rural areas without access to a public water supply – potential pollution issues from increased use of private drainage solutions. In reviewing the appropriateness of the settlement strategy the Structure Plan Alteration will need to weigh up the need to support development in rural areas in order to maintain the vitality of these areas against the potential adverse environmental impact of a possible proliferation of private septic tanks.</p> <p>Under the Water Framework Directive there is a requirement to maintain and enhance both the quality of the water environment and to achieve good ecological status (which includes water quality, quantity, ecology / habitats and physical impacts). The Structure Plan Alteration can contribute to achieving good status, reduce pollution, promote sustainable water use and contribute to the mitigation of floods and draught.</p>	<p>The Environmental Report identified strategic environmental sensitivities across Perth & Kinross including the Loch Leven catchment area and Loch and Transitional water bodies and these were used to assist in determining the environmental capacity of each HMA to be able to accommodate the need for new housing arising in that area.</p> <p>As above-mentioned a portion of the housing land requirement in the Kinross Area is reallocated to the Perth Area primarily due to the constraints imposed by Loch Leven which affects the ability of the Kinross Area to accommodate the housing land requirement in full.</p>



Topic	Problems & Issues and Relevance for Structure Plan Alteration	How they have been taken into account
Air quality & noise	<p>High emissions from road traffic and levels of air pollution in some part of Perth & Kinross</p> <p>Greenhouse gas emissions</p> <p>Noise from trunk roads and railways</p> <p>High dependency on the private car in some areas</p> <p>Trans-boundary effects</p>	<p>It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, these issues will be addressed through the emerging Strategic and Local Development Plans.</p>
Climatic factors	<p>Vulnerability of Perth & Kinross to the effects of climate change such as the increased risk of flooding. There will be a need for the Structure Plan Alteration to take account of the areas which are already at risk from the effects of climate change in order to avoid exacerbating the problems in these areas. The Structure Plan Alteration has the ability to influence the use of energy conservation / efficiency measures and renewable energy in new development and reduce dependency on unsustainable modes of transport.</p>	<p>Consideration given to the need for managed retreat in the Carse of Gowrie area where appropriate in order to protect communities from the potential future threat of flooding and sea-level rise.</p>
Cultural heritage	<p>Impact of increased pressure for inappropriate development on sites of historical importance such as battlefields and historic landscapes</p> <p>Visual intrusion from roads and traffic including signage and traffic calming measures. Concern about the urbanisation of rural and sensitive environments.</p>	<p>It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, these issues will be addressed through the emerging Strategic and Local Development Plans.</p> <p>In the meantime the existing Development Plan policy framework which seeks to protect and enhance cultural heritage will address these issues.</p>
Landscape	<p>Increased pressure for development resulting in an incremental adverse impact on the landscape, both in terms of designated sites and wider landscapes. Resultant effects on health and quality of life.</p> <p>Inappropriately sited and designed development can impact negatively on the landscape and on historic settlement patterns. Consideration will need to be given to the ability of settlements to accommodate new development without adverse impacts and local distinctiveness in assessing capacity for new development.</p> <p>Visual intrusion from roads and traffic including signage and traffic calming measures. Concern about the urbanisation of rural and sensitive environments.</p>	<p>It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, these issues will be addressed through the emerging Strategic and Local Development Plans.</p> <p>In the meantime the existing Development Plan policy framework which seeks to protect and enhance the areas landscapes will address these issues.</p>



Topic	Problems & Issues and Relevance for Structure Plan Alteration	How they have been taken into account
Material assets	<p>The proper management of infrastructure and conservation of resources is central to the Council's aim of achieving sustainable development and protecting the environment. This has implications for avoiding the wasteful use of resources or the sterilisation of potentially valuable reserves.</p> <p>Consideration will need to be given as to whether the necessary infrastructure for waste management is available to accommodate growth.</p>	<p>It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, these issues will be addressed through the emerging Strategic and Local Development Plans.</p> <p>In the meantime the existing Development Plan policy framework which seeks to make provision for waste management infrastructure and the protection of the areas mineral resource will address these issues.</p>

Consultation comments and how they have been taken into account

The tables below provide a summary of the comments received from the Consultation Authorities and from other organisations and individuals on the draft Structure Plan Alteration, and summaries how comments have been taken into account in the Finalised Structure Plan Alteration.

Consultation Authority comments

Page	Comment	How they have been taken into account
Historic Scotland		
	The report provides a clear overview of the environmental implications of the Structure Plan Alteration. Content that comments on the scoping report have been taken into account. & welcome appendix 6. Agree with the conclusions reached.	Noted
Non-tech summary	Provides a clear and concise overview of the assessment process and outcomes	Noted
8-12	Introduction & Context – provide a clear overview	Noted
Appendix 3	Relationship to other plans programmes or strategies – welcome inclusion of the SHEP series, NPPG5 and NPPG18. For information SPP23: Planning & the Historic Environment has now been published which supersedes and consolidates NPPG5 & 18. SHEP supersedes the policy elements in <i>Passed to the Future</i> which could therefore be removed from the review.	Noted



Page	Comment	How they have been taken into account
13-16	<p>Existing environmental problems & issues</p> <ul style="list-style-type: none"> • Welcome information provided and agree with potential impacts identified for the historic environment • Appendix 1 Baseline information is comprehensive. Note that some gaps have been identified for the historic environment e.g. current status of scheduled ancient monuments but many require little attention. HS Monument Wardens visit scheduled sites on a regular basis and record condition • Welcome inclusion of planning application statistics – question whether number are based upon GDPO consultations triggered where there may be impacts upon the setting of Category A listed buildings and / or scheduled monuments. 	<p>Noted</p> <p>Noted</p> <p>Noted</p>
18-23 & appendix 2	<p>Selection of preferred alternative</p> <ul style="list-style-type: none"> • Welcome the clear outline of how alternatives were assessed and largely agree with conclusions • Note that in some instances the proposed mitigation measures do not always specify the appropriate / sensitive re-use of listed buildings – some features of the historic environment to not lend themselves to restoration and it is therefore important that any interventions are appropriate • Welcome inclusion of commentary and assumption on p.78 confirming all elements of the historic environment were considered 	<p>Noted</p> <p>It's not considered appropriate for a strategic land use plan to consider such detail. This will be picked up through the LDP</p> <p>Noted</p>
30-32	<p>Mitigation</p> <ul style="list-style-type: none"> • Note and agree with the potential for negative impacts on the historic environment identified • Welcome mitigation measure to address impact however may wish to alter this in light of comments above regarding the restoration of buildings • In implementing the requirements of the Structure Plan Alteration agree that the re-use of historic buildings would be beneficial but important that any Local Development Plan policies acknowledge that these interventions should be sensitive and appropriate • While new development may give rise to impacts on site / setting of listed buildings existing Local Plan policies for the appropriate protection of these assets will mitigate this 	<p>Noted</p> <p>Noted</p>



Page	Comment	How they have been taken into account
39-41	<p>Monitoring</p> <ul style="list-style-type: none"> • Welcome information on monitoring and agree with predicted effects for the historic environment • Would be useful for the SEA Statement to indicate who will be responsible for both carrying mitigation through and monitoring the effects of the Structure Plan Alteration • Note and welcome that the number of planning applications impacting on Gardens & Designed landscapes will be monitored, similar indicators for other historic features could be included: number of scheduled monuments lost or significantly affected by proposals; number of listed buildings lost or significantly affected by proposals; number of archaeological sites lost or significantly affected by proposals etc. 	<p>Noted</p> <p>It may not always be possible to identify the body responsible for undertaking the mitigation</p> <p>Noted</p>
Scottish Environmental Protection Agency (SEPA)		
	<p>Environmental report provides a clear assessment of the potential significant adverse effects and generally agrees with assessment findings. Comments provided in the scoping response have been taken into account.</p>	Noted
	<p>Recommends a Strategic Flood Risk Assessment is carried out to inform the development planning process</p>	This will be done as part of the SDP and LDP processes.
Non-technical summary	<p>Provides a clear summary</p>	Noted
8-12	<p>Introduction and Context</p> <ul style="list-style-type: none"> • Background information provided useful • Appendix 3 provides comprehensive review of other PPS 	Noted
13-16	<p>Existing Environmental Problems</p> <ul style="list-style-type: none"> • All relevant aspects of the environmental baseline have been considered in relation to the SEA issues within SEPA's remit • Table provides a comprehensive review of current problems and issues and relevance for the Structure Plan Alteration 	Noted
17	<p>Evolution of the Environment without the Structure Plan Alteration – the main trends have been identified</p>	Noted



Page	Comment	How they have been taken into account
18-30	<p>Selection of Preferred Alternative</p> <ul style="list-style-type: none"> • Welcome the transparent approach to the assessment and the detailed and thorough descriptions of the environmental effects of each alternative considered • Generally agree with detailed assessment findings of Appendix 2 and consider the potential effects likely to result from the proposed Structure Plan Alteration have been identified • Welcome the consideration of secondary, cumulative and synergistic effects – found description of key environmental impacts by planning area useful 	<p>Comments welcomed.</p>
	<p>Mitigation</p> <ul style="list-style-type: none"> • Welcome the proposed mitigation measure on soils; another potential measure to mitigate against effects on soil sealing is higher density development where appropriate • Welcome mitigation measures on the water environment but measures are identified in the detailed assessment tables in Appendix 2 that refer to the need for allocated sites in Local Plans to avoid floodplain areas and to address the potential adverse effects relating to flood risk but this is not included in the mitigation summary table • The primary mitigation measure in relation to flooding should be avoidance in line with the mitigation hierarchy and the precautionary principle advocated in SPP7. Local Plans should therefore allocate development in areas that are not at risk from flooding and do not increase the risk of flooding elsewhere – these decisions should be informed by a Strategic Flood Risk Assessment. Recommends the SFRA should be identified as a mitigation measure to be implemented at Local Plan level. Further detailed flood risk assessment may also be required at Development Management stage. • The increase in development is also likely to result in an overall increase in greenhouse gas emissions and energy use which contributes to effects on climatic factors – could be mitigated by putting in place requirements for new housing to incorporate energy efficiency and renewable energy measures 	<p>Comments welcomed.</p> <p>It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, the comments will be of assistance in developing the emerging Local Development Plan.</p>



Page	Comment	How they have been taken into account
30-38	<ul style="list-style-type: none"> An increase from waste arising from the domestic sector is likely to be a consequence of increased development and will result in an increase in the demand for sustainable waste management facilities – mitigation measures should refer to the need to take this growth into account in the planning for waste management facilities for Perth & Kinross and in the preparation of Local Plans. Mitigation measures could also refer to the need for large scale development to incorporate local level facilities for sustainable waste management and this should be implemented at Development Management stage. Welcome the approach to determining the environmental capacity of each Housing Market Area – detailed map of environmental constraints useful for providing an overview A key environmental problem identified in some Structure Plan areas was the existence of public drainage systems at or close to capacity and the proliferation of private systems – would be relevant to refer to the need to consider waste water drainage infrastructure and for liaison with Scottish Water and their improvement programme as mitigation measures to be implemented at Local Plan level Would welcome a reference to compliance with the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (as amended) at Development Management stage and to take cognisance and contribute to the measures for the water environment as identified for the Structure Plan area in the River Basin Management Plan at the Local Planning and Development Management stages Welcome measures on air quality – careful consideration should also be given at Local Plan stage to the location of new development in relation to Air Quality Management Areas and the potential for such development to contribute to exceeding limit values and also to the co-location of housing and industrial sites. These may also result in impacts on human health. 	<p>Comments welcomed.</p> <p>It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, the comments will be of assistance in developing the emerging Local Development Plan.</p>
38	Welcome the description of the difficulties encountered	Noted
39	Monitoring – welcome early consideration of monitoring requirements and the link between expected effects and potential monitoring indicators	Noted



Page	Comment	How they have been taken into account															
Scottish Natural Heritage (SNH)																	
	Baseline report provides a sound basis on which to carry out the assessment. Note that much of the information provided at scoping stage has been incorporated.	Noted															
Appendix 2	Tables provide a practical and fair assessment of the possible environmental effects	Noted															
22-23	<p>Concern that the process of how the SEA has influenced the outcome of the Structure Plan Alteration is poorly explained and does not reflect the approach taken in practice: alternative 3 – distributing growth according to the environmental capacity of each Housing Market Area (HMA) – is identified as the primary basis for distributing growth with consideration also given to the need to meet the housing land requirement in each HMA and the need to take account of the infrastructural carrying capacities of each HMA, but this is not the approach taken in practice.</p> <table border="1" data-bbox="264 1106 954 1662"> <thead> <tr> <th></th> <th><i>Process claimed to have been followed</i></th> <th><i>Process actually followed</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Calculate environmental capacity of HMA for growth</td> <td>Consider need to meet housing requirement in each HMA</td> </tr> <tr> <td>2</td> <td>Consider need to meet housing requirement in each HMA</td> <td>Take into account environmental capacity of HMA for growth</td> </tr> <tr> <td>3</td> <td>Take into account infrastructure needs</td> <td>Take into account infrastructure needs</td> </tr> <tr> <td>4</td> <td>Calculate HMA allocation</td> <td>Calculate HMA allocation</td> </tr> </tbody> </table>		<i>Process claimed to have been followed</i>	<i>Process actually followed</i>	1	Calculate environmental capacity of HMA for growth	Consider need to meet housing requirement in each HMA	2	Consider need to meet housing requirement in each HMA	Take into account environmental capacity of HMA for growth	3	Take into account infrastructure needs	Take into account infrastructure needs	4	Calculate HMA allocation	Calculate HMA allocation	<p>Concern noted.</p> <p>The 'revised' Alteration and associated documents make explicit how the SEA process influenced the development of the alternatives and the reason for adopting the 'preferred' alternative</p>
	<i>Process claimed to have been followed</i>	<i>Process actually followed</i>															
1	Calculate environmental capacity of HMA for growth	Consider need to meet housing requirement in each HMA															
2	Consider need to meet housing requirement in each HMA	Take into account environmental capacity of HMA for growth															
3	Take into account infrastructure needs	Take into account infrastructure needs															
4	Calculate HMA allocation	Calculate HMA allocation															



Page	Comment	How they have been taken into account
22-23	<p>This is apparent because if alternative 3 was the primary basis for allocating growth as claimed it is a large co-incidence that, with the exception of the 10% reallocation from Kinross to Perth, the environmental capacity of each HMA exactly matched the HMA requirement. SEA does not require decision-makers to adopt the option assessed as having the least likelihood for significant adverse impact – the requirement is to set out what the impacts might be and demonstrate they have been taken into account and / or mitigated against where possible. It would therefore be more accurate to say that although alternative 3 had the least likelihood for significant adverse impacts; allocations were primarily based on alternative 1 but also took into account the environmental capacity of each HMA. Recommend this issue is addressed in the version of the Environmental Report that accompanies the Finalised Structure Plan Alteration and that the content of the Finalised Structure Plan Alteration is consistent with this.</p>	
31	<p>Mitigation – measures in relation to protecting and enhancing countryside and townscape character are not sufficiently ‘action orientated’ to ensure they will be taken account of when it comes to allocating sites for new housing in Local Development Plans – the mitigation related to potential landscape impact should instead be ‘carry out landscape capacity studies of existing settlements to inform Local Plan allocations’</p>	<p>Noted. It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, the comments will be of assistance in developing the emerging Local Development Plan.</p>
41	<p>Monitoring</p> <ul style="list-style-type: none"> • Welcome the attempt to set out appropriate indicators of environmental change but in relation to landscape ‘change in number and area of nationally designated landscape areas’ is not an appropriate indicator as nationally designated areas only comprise a small proportion of the area and are the areas least likely to change • Difficultly in that there is no single meaningful ‘index’ of landscape change yet available that can be applied at the local level – an approach might be to identify the key features that contribute to the special qualities of the Landscape Character Areas and monitor some of those features 	<p>Noted. Uncertain that Landscape Character Types identify ‘special qualities’. Would welcome the opportunity to work with SNH on developing a ‘meaningful index of landscape change’ and to develop a robust indicator(s) of change.</p>

Comments from Organisations / Members of the Public

Page	Comment	How they have been taken into account
	Scottish Wildlife Trust	
	Commend PKC for robustness of the SEA	Support welcomed
	Broadly supportive of selected Alternative	Noted
	Hope that the areas identified in the Environmental Report as being under considerable environmental constraint from development will be acknowledged in Local Development Plans	Maps show environmental sensitivities rather than 'constraints'. The purpose of the SEA process is to give the plan-maker and decision-taker the information necessary to make an informed choice about the appropriateness of a particular course of action and what can be done to mitigate or enhance the effects.
10	Question whether the population projections have considered the economic downturn	This is a comment on the Plan rather than the environmental assessment of it.
11	In the Structure Plan Alteration Objectives table bullet point 4 should be phrased "to protect and enhance habitats and the biodiversity therein, and species of international, national and local importance"	It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, the comments will be of assistance in developing the emerging Local Development Plan.
13 - 15	<p>Existing environmental problems and issues</p> <ul style="list-style-type: none"> • Under Biodiversity etc. – there should be reference to climate change being one of the threats; also BAP and LBAP species should be referenced in the text; there is also a threat from invasive species – which are not necessarily non-native (alien) • Under Population & human health – agree new housing can contribute to improving the quality of existing green space and open space <i>if appropriately located and designed sensitively and imaginatively</i>, where opportunities exist consideration for the incorporation of wildlife corridors providing connectivity between habitats for wildlife and people should be encouraged. It should also be stressed that there is a beneficial effect when dwellings are closely connected to green and open space in terms of human health and in a sense of wellbeing. 	<p>Noted</p> <p>It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, the comments will be of assistance in developing the emerging Local Development Plan.</p>



Page	Comment	How they have been taken into account
13 - 15	<ul style="list-style-type: none"> Under Water – should be emphasised that there will be a presumption against development on floodplains; also SUDS are recommended for dealing with increased and rapid run off from new housing developments and can provide opportunities to enhance biodiversity and increase connectivity between habitats. Under Climatic factors – opportunities for adaptation (increasing the ability of natural systems to absorb and respond to change) to climate change should be considered in the location and design of housing developments. Measures such as ensuring connectivity between habitats and promoting diverse and healthy habitats will ensure there is robustness at the ecosystem level to withstand and adapt to climate change. 	<p>It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, the comments will be of assistance in developing the emerging Local Development Plan.</p>
21	<p>Assessment of Alternatives</p> <ul style="list-style-type: none"> Under first SEA objective there should be a reference to BAP and LBAP species and priority habitats; locally designates sites should also be protected Under 6th SEA objective it should also be stated that increasing biodiversity, maintaining healthy ecosystems and providing connectivity between habitats to allow species to migrate will augment the area's capacity to adapt to climate change 	<p>The assessment recognises the importance of all habitats and species however it is not considered appropriate contain that level of detail in a strategic document as the Environmental Baseline reflects the high-level and strategic nature of the plan. It will be for the Local Development Plan to assess the effects of development sites and buildings of local significance.</p>
31	<p>Mitigation – under Biodiversity etc. it should be noted that there is also a risk of adverse impacts on biodiversity in general (a significant amount of biodiversity interest is located outwith protected sites). Housing development may also cause habitat fragmentation thereby decreasing the connectivity between habitats (which could have adverse impacts on species commuting / migrating between habitats); The SP and LP should not only safeguard against adverse impacts but also produce positive benefits for species and habitats where opportunities arise</p>	<p>Noted</p> <p>It is acknowledged that development can offer the opportunity to adversely affect biodiversity and Development Plan policies already seek to ensure that such all habitats and species are protected form inappropriate development.</p>
32	<p>Strategic constraints map – question whether wildlife corridors have been shown (difficult to see) as this would illustrate where habitat fragmentation / decrease in connectivity is likely to occur from inappropriately located housing development. The map could also show where there are opportunities to increase connectivity between habitats and improve public access to wildlife. Also question whether local nature reserves / LNCS are shown.</p>	<p>Wildlife corridors have not been shown. However, LCS88 data set which maps habitat and land use types was used. However, more up-to-date data is required at a national level.</p>



Page	Comment	How they have been taken into account
39	<p>Monitoring</p> <ul style="list-style-type: none"> Under Biodiversity disagree that development is unlikely to result in enhancement; mitigation should ensure there are opportunities for enhancement of biodiversity in all developments. If there is greater connectivity between habitats there could be a positive effect on protected areas and species Consideration should be given to using aerial photography / GIS to map wildlife corridors, habitat types and percentage cover of each. It should be remembered that larger areas of semi-natural / natural habitat will generally contain more species than smaller ones. Also connectivity between habitats allows migration of species between habitats. 	<p>Noted</p> <p>It is acknowledged that development can offer the opportunity to improve biodiversity and Development Plan policies already seek to ensure that such opportunities are taken.</p> <p>Sensitivity mapping in the Environmental Report used the LCS88 data set which maps habitat and land use types. However, more up-to-date data is required at a national level.</p>
43	<p>Environmental baseline – biodiversity table should include locally designated sites such as LNCS</p>	<p>Noted.</p> <p>While the importance of local designations is acknowledged the Environmental Baseline reflects the high-level and strategic nature of the nature of the plan. It is considered more appropriate level for the Local Development Plan to include such baseline information.</p>
Perth & Kinross Heritage Trust		
31	<p>Mitigation of the negative effects on the historic environment should include archaeological sites as well as historic buildings e.g. “Local Plan policies to protect the historic environment and encourage restoration and reuse of historic buildings”</p>	<p>Noted.</p> <p>Mitigation measures will reflect the need to reduce the negative effects on the historic environment and enhance positive effects.</p>
59 - 60	<p>Environmental Baseline – Historic Environment</p> <ul style="list-style-type: none"> Does not mention non-designated archaeological sites or historic buildings of local significance - PKHT can provide relevant data Historic Scotland have renamed Scheduled Ancient Monuments to Scheduled Monuments and Historic Gardens & Designed Landscapes to Gardens and Designed Landscapes 	<p>Noted.</p> <p>While it is acknowledged that non-designated sites or buildings of local significance have not been included in the Environmental Baseline this reflects the high-level and strategic nature of the plan. It will be for the Local Development Plan to assess the effects of development sites and buildings of local significance.</p>



Page	Comment	How they have been taken into account
68, 70 & 72	<p>Alternatives 1-3</p> <ul style="list-style-type: none"> Proposed measure for the mitigation of adverse effects for Alternatives 1 & 2 should be appended to Alternative 3 For all three Alternatives mitigation measures through local policies should be for the whole of the historic environment rather than just historic buildings 	<p>Noted.</p> <p>It should be noted that the policy element of the Structure plan Alteration has not been carried forward to the Guidelines. Nonetheless, these issues will be addressed through the emerging Strategic and Local Development Plans.</p> <p>In the meantime the existing Development Plan policy framework which seeks to protect and enhance the historic environment will address these issues.</p>
78	<p>Assessment Criteria Table – replace ‘historically and culturally important areas...’ to ‘the historic environment and taking into account both site and setting’</p>	<p>Noted</p>
88, 96 & 108	<p>Appendix 3 – SHEPs 1 & 2 were succeeded by a single SHEP in October 2008 and NPPG5 and 18 were replaced by SPP23 in October 2008</p>	<p>Noted.</p> <p>It should also be noted that Scottish Planning Policy has replaced the suite of NPPGs and SPPs.</p>
Montgomery Hanson Partnership		
37	<p>It is unclear how the methodology within the Environmental Report has reached the conclusion that there is limited scope for development in the Kinross area due to the location within the Local Leven Catchment Area and the perceived impact of development on the area’s biodiversity. Further clarification is required to ensure an objective approach has been taken.</p>	<p>A series of maps were produced to help identify whether the significant environmental constraints in Perth and Kinross would mean that it would not be possible to identify enough land in individual Housing Market Areas to be able to accommodate the need for land arising in that area. A detailed map of all the environmental designations and constraints across Perth and Kinross was produced and from this individual maps were produced for each Housing Market Area showing the total amount of constrained land along with how the constrained areas relate to the infrastructure network.</p>



Page	Comment	How they have been taken into account
37		Consequently, the Kinross Housing Market Area offers limited potential for further growth, with the internationally designated Loch Leven acting as a potential constraint to development and also potential issues regarding designated landscapes, flood risk and water resource availability.
Kinross-shire Civic Trust & Portmoak Community Council		
	The issues addressed by the SEA are disappointing. The SEA only identifies such issues as the Loch Leven Catchment and ignores issues like long distance commuting to offices, shops and schooling. The major housing increase is going to come from in-migration which can only come from people working in Edinburgh etc. The catchment areas north of the Forth may take up a considerable number of these. Government requirements to reduce carbon emissions are totally contrary to these. There may be a natural decrease in long distance commuting due to increased fuel prices.	It is acknowledged in the Environmental Report that long distance commuting and car use is an issue for the whole Perth & Kinross. It proposes to mitigate this effect by encouraging new development close to or within existing centres, and encouraging employment opportunities in those areas where commuting is greatest to reduce the need to travel.
Scone & District Community Council		
Non-tech summary	<p>Assessment of environmental impacts of each Alternative can only be based on assumptions</p> <ul style="list-style-type: none"> Directing development to locations which reduce the need to travel has been assessed as minor positive and minor negative in different Alternatives yet the CC have been advised that there will be major housing developments in Scone and the majority of the households will commute to Glasgow or Edinburgh With Scone being omitted from the Air Quality Report this should have been assessed as major negative 	It is acknowledged that the assessment of impacts is based on a number of assumptions. However, the assumptions have been made explicit in the Environmental Report. It is not accepted that the majority of households in Scone will be commuters to central Scotland.
Deer Commission		
	There is no mention of deer in the habitat assessment – consideration should be given to the implications of attracting roe deer onto new development sites	Noted. However, it is considered that the Environmental Baseline reflects the high-level and strategic nature of the plan. It will be for the Local Development Plan to assess the effects of and on development sites.



Page	Comment	How they have been taken into account
	K Barrett	
Non-tech summary	Documents should be more thoroughly proof-read – there is a lack of explanations of abbreviations and inclusion of appendices	Noted

Section 5: Revised Mitigation measures

A series of mitigation measures were identified in the Environmental Report. These have been revised to take account of the consultation responses and are identified in the table below. Following the consultation process an additional column has been added to indicate who will be responsible for each mitigation measure.

Topic	Issue	Mitigation measure	Responsible body
Biodiversity, flora & fauna	Risk of adverse impact on protected areas and species	Structure Plan and Local Plan policies already seek to safeguard against adverse impacts on protected areas and species	P&K
Soil	Accommodating development involves the use of soils	Local Development Plan policies to support the re-use of brownfield sites to minimise use of greenfield land and productive soils Local Development Plan policies to support higher density development where appropriate to mitigate against effects of soil sealing	P&K
Water	Accommodating development likely to impact on waterbodies to some extent	Consider the potential impact on waterbodies when allocating sites in the Local Development Plan and seek to avoid sites which would result in the deterioration of the ecological status of waterbodies Where sensitive sites cannot be avoided require mitigation of adverse impacts and enhancement through the planning application process Require SUDS through Local Development Plan policies and Drainage Impact Assessments where necessary Compliance required through the Development Management process with the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (as amended) Take cognisance and contribute to the measures for the water environment as identified for the Structure Plan area in the River Basin Management Plan at the Local Development Planning and Development Management stages	P&K, SEPA, Individual developers
	Impact of increased levels of development on the waste water drainage infrastructure	In allocating sites in the Local Development Plan take account of the waste water drainage infrastructure in liaison with Scottish Water and their improvement programme	P&K, Scottish Water, SEPA



Topic	Issue	Mitigation measure	Responsible body
Air quality & noise	<p>In directing to most appropriate areas in environmental terms not necessarily reducing journey length</p> <p>Duration & permanency unknown because will depend on factors outwith Council control – does not address the fundamental issue that people can and will choose to travel regardless</p>	<p>Allocate sites in the Local Development Plan close to / within existing centres</p> <p>Promote Local Development Plan policies which direct windfall development to brownfield sites within existing settlements</p> <p>Local Development Plan policies to promote employment opportunities in areas of high demand and also initiatives such as home-working to reduce the need to travel, and the co-location of housing and industrial sites</p> <p>In allocating sites in the Local Development Plan careful consideration to be given to the location of new development in relation to Air Quality Management Areas and the potential for such development to contribute to exceeding limit values</p>	P&K and individual developers
	Climatic factors	<p>Directing development to take account of where infrastructure capacity exists could increase pressure for the development of land at risk of flooding</p>	<p>Allocate sites in the Local Development Plan which avoid floodplain areas (in line with the mitigation hierarchy and the precautionary principle advocated in SPP7) and which do not increase the risk of flooding elsewhere</p> <p>The allocation of sites in the Local Development Plan to be informed by a Strategic Flood Risk Assessment (further detailed flood risk assessment may also be required at Development Management stage)</p> <p>Where such areas cannot be avoided ensure adequate flood prevention measures are put in place through the planning application process</p> <p>Local Development Plan policies to promote sustainable development practices</p>
<p>Increase in the level of development likely to result in an overall increase in greenhouse gas emissions and energy use which contribute to effects on climatic factors</p>		<p>Local Development Plan policies to require new housing to incorporate energy efficiency and renewable energy measures</p>	P&K

Topic	Issue	Mitigation measure	Responsible body
Cultural heritage	Potential for negative impacts of development on the historic environment	Local Development Plan policies to promote the sensitive restoration and reuse of historic buildings <i>where appropriate</i> (some features of the historic environment do not lend themselves to restoration and Local Development Plan policies must therefore recognise that any interventions must be appropriate) New development may give rise to impacts on the site and / or setting of listed buildings – existing Local Development Plan policies for the appropriate protection of these assets will mitigate this.	P&K, Historic Scotland, Perth & Kinross Heritage Trust
Landscape	Potential for negative impacts of development on the landscape	Existing Structure Plan and Local Plan policies seek to protect designated landscapes Local Development Plan policies to promote opportunities for enhancement of the landscape through proposals for new development	P&K and individual developers
	Environmental criteria does not necessarily respect settlement character	Allocate sites in the Local Development Plan so as to enhance the existing settlement form rather than detract from it – where detracting cannot be avoided ensure mitigation and enhancement measures are required through the planning application process	P&K
Material assets	Allocation of requirement according to environmental criteria is not necessarily where the resources are	Local Development Plan policies to promote sustainable development practices including sustainable construction	P&K and individual developers
	Whilst re-use of land and building generally positive could also be negative effects as brownfield land may be of higher biodiversity value than greenfield land	Assessment of the biodiversity value of brownfield sites and existing buildings required through the planning application process and where necessary mitigation and enhancement measures put in place	Individual developers, P&K



Topic	Issue	Mitigation measure	Responsible body
	<p>Increased development likely to result in an increase in the demand for sustainable waste management facilities to deal with an increased volume of domestic waste</p>	<p>Level of growth to be taken into account in the planning for waste management facilities for Perth & Kinross and in the preparation of the Local Development Plan</p> <p>Large scale development to incorporate local level facilities for sustainable waste management implemented at Development Management stage</p>	<p>P&K and individual developers</p>

Section 6: Implementation & Review

Monitoring Measures

The Environmental Assessment (Scotland) Act requires that responsible authorities monitor the significant environmental effects of the implementation of the plan for which an Environmental Assessment has been carried out to enable the authority to identify any unforeseen adverse effects at an early stage and undertake appropriate remedial action. The Environmental Report identified measures to prevent, offset or reduce the significant effects of the plan and its modifications. Where appropriate, changes were made to the policies and development proposals within the plan, as described in previous sections of this report. However, as was indicated earlier in this document it has not been possible to take the policy element of the Guidelines forward to the approved guidelines. Nonetheless, mitigation measures will be taken forward as the Local Development Plan is progressed and implemented.

The primary mechanism for monitoring the impacts of the guidelines will be through the existing, effective channels for two-way communication with our wide range of stakeholders. Following consultation undertaken for the Structure Plan Alteration/Guidelines, the proposed indicators for monitoring the strategy were adjusted, and priority indicators were identified.

Annual reporting of the uptake of housing land will be undertaken with the report being posted on the Council's web site. In addition, there will be 5 yearly consideration of the need to review the Guidelines.

A State of the Environment Report has been prepared for Perth and Kinross and this will assist in the monitoring any impact of the implementation of the Guidelines. The Report is available on the Council's website at:

<http://www.pkc.gov.uk/Planning+and+the+environment/Planning/State+of+the+Environment+Report.htm>

However, it is important to recognise that the purpose of the monitoring, in this instance, is to establish the significant environmental effects of the implementation of the approved Structure Plan and the supporting Guidelines, as distinct from the effect on the environment of other unconnected changes. A monitoring programme was outlined in the Environmental Report with the intention of using the monitoring information to inform the development of the Local Development Plan. It is proposed that the monitoring programme will assess the following changes:

Expected effect	Indicators	Responsible body
Biodiversity		
Unlikely to result in enhancement but should be no adverse impact on protected areas and species	Change in condition of designated sites	SNH
	Change in condition of natural and semi-natural habitats	SNH
	Change in proportion of priority species and showing net population or range recovery	SNH/PKC
	Changes in timing of blooming and migration	SNH/PKC



Expected effect	Indicators	Responsible body
Population & human health		
Projected growth will be accommodated in the HMA in which it arises except where there are significant environmental constraints in which case a proportion of the requirement will be reallocated to another HMA	No. years effective housing land supply in each Housing Market Area (monitored annually)	PKC
Soils		
Some effect on soils expected but without significant adverse impact on the most sensitive areas	Extent and condition of geological SSSIs Percentage change in hectares of land with capability for agriculture by Land Use Classification Change in amount of land recorded as vacant and derelict land in relation to the amount of development on brownfield land State of soil	SNH PKC PKC Not yet gathered
Water		
Some effect expected but no significant adverse impact on the most sensitive water bodies	Change in percentage of river length assessed as good quality / good chemical quality Change in number of surface water bodies achieving good status Change in quality of groundwater Proportion of new development incorporating Sustainable urban Drainage Systems	SEPA SEPA SEPA PKC
Air quality & noise		
Directing development so as to avoid the most sensitive environmental areas may have some impact on journey length which in turn may affect air quality	No. days air quality exceeds legislative limits Mean annual levels of key air pollutants Tonnes of carbon dioxide emitted by travel behaviour of residents Overall traffic volume and average distance travelled by mode Reduction in levels of traffic congestion on major roads	PKC PKC SG SG SG
Climatic factors		
Development sites will be identified so as to avoid potential flood areas so no significant adverse impact expected	Percentage of development in areas of flood risk and requiring flood defences Change in number of flooding events Change in one in two hundred year flood outline Water quantity, annual peak flow at key	PKC PKC SEPA SEPA



Expected effect	Indicators	Responsible body
	gauging stations	
Cultural heritage		
Unlikely to result in enhancement but should be no adverse impact on historically or archaeologically important sites	Change in number of important buildings and scheduled ancient monuments at risk Volume of planning applications impacting on gardens and designed landscapes Number of scheduled monuments lost or significantly affected by development proposals Number of listed buildings lost or significantly affected by development proposals Number of archaeological sites lost or significantly affected by proposals Change in area of ancient and semi-natural woodland	HS PKC FC/PKC
Landscape		
Some impact on the landscape and townscapes expected but development sites will be identified so as to avoid significant adverse impact on the most sensitive locations and may be some potential for enhancement	Changes identified in landscape character assessments Change in number and area of nationally designated landscape areas Percentage change in area of Wild land Changes in existing settlement patterns	PKC/SNH SNH PKC/SNH PKC
Material assets		
No major effect as a result of the Structure Plan Alteration expected – potential for minimising resources will depend on site specific land allocations	Percentage of new development on greenfield compared to brownfield land considering amount of brownfield land available	PKC



Conclusion

We believe that the SEA process has been of significant help in developing balanced Guidance for housing and population growth in the area. It also helps promote transparency in our plan making processes. This, in turn, will ensure that new housing in Perth & Kinross will be accommodated in such a way as to be an exemplar of sustainable development, benefiting the people of the area and protecting and enhancing the environment.

POLICY GUIDANCE: POPULATION & HOUSEHOLDS

Introduction

- 1.1 This policy guidance has been prepared as interim guidance on population and household numbers in Perth and Kinross until such time as the new TAYplan Strategic Development Plan (SDP) is in place. The Perth and Kinross Structure Plan 2003 remains the approved structure plan for the area until it is replaced by the SDP. This guidance should therefore be read in conjunction with the Structure Plan.


Review of the housing land requirement

- 2.1 The Structure Plan was based on a 3% growth scenario. However the latest 2006-based population projections¹ from the General Register Office for Scotland project a significant increase in population in the period to 2031. Both population growth and the continuing trend towards smaller average household sizes will generate need for new housing during the Plan period. Based on a 13% population growth between 2006 and 2020 the projected increase in households over this period is 12,300 which is significantly higher than that previously projected.
- 2.2 In light of the above a review was undertaken in 2008 to update the section of the existing Perth & Kinross Structure Plan Report of Survey relating to population and households. The full update is available on the Council's website but in summary it was concluded that the projected population increase was of such significance that the Council would be unable to meet its obligation in terms of Scottish Planning Policy 3: Planning for Homes and the Structure Plan to maintain a 5 year supply of effective housing land from the existing housing land requirement identified in Schedule 1 of the Structure Plan. Schedule 1 therefore required to be updated.
- 2.3 There was a good supply of housing sites throughout Perth and Kinross over the early years of the Structure Plan. However the updated Schedule 1 identifies need or demand for an additional 7,820 houses over and above the housing land supply at 2008.

Structure Plan Strategy

- 3.1 The overall strategy of the Structure Plan is still applicable.
- Perth Core Area*
- 3.2 The update to the Report of Survey identified a supply of land for 1,985 houses comprising 525 in Perth itself and around 1,500 elsewhere in the Core area. The total housing land requirement for the Perth Area is 7,375. Land for an additional 5,390 houses will therefore be needed to ensure the maintenance of a continuous 5 year effective supply of housing land to the end of the Structure Plan period.
- 3.3 Given the scale of the additional land requirement arising from a 3% growth scenario in the Structure Plan it was envisaged that village expansions would be

¹ The draft 2008-based projections have just been published by GROS but these are not due for publication at Local Authority level until January 2010.



small scale. However it is anticipated that even with the sites which are already identified coming forward together with other opportunities within the city it will still be necessary to expand existing villages in the core area and the scale of some of these expansions may need to be larger than that envisaged in Structure Plan Policy 5. Any larger-scale expansions should be concentrated on those villages already offering a range of facilities and services while seeking to enhance such provision where appropriate.

- 3.4 In light of the above the Structure Plan recognises that traffic and transport links are key issues in accommodating development within the Perth Core area. One of the major constraints facing the development of this area is the ability of both the strategic and local roads network to accommodate planned growth. The Perth Area Traffic model has been constructed to assess the implications of traffic growth arising out of current development and proposed future allocations. Following discussion with Transport Scotland it has been agreed that the Traffic model will be used to identify where capacity exists to accommodate further development and to identify areas where development may be constrained or may require improvements to the local or strategic road network prior to the development taking place.

Lowland Area

- 3.5 The Kinross Housing Market Area (HMA), which forms part of the Lowland area, is an area of very high demand and additional land allocations are required in order to maintain a 5 year effective supply of land. A Strategic Environmental Assessment has been undertaken to assess the impact of seeking to accommodate the level of growth resulting from the increased population projections. Whilst the potential for significant environmental impact arising from increased levels of demand was identified as an issue across the whole of Perth and Kinross, the level of environmental constraint is particularly high in the Kinross HMA. This is primarily due to the potentially significant adverse environmental impact on Loch Leven. As a result 10% of the requirement arising in this area has been reallocated to the Perth HMA where there are more opportunities to accommodate additional development without having significant environmental impact.

Upland Area

- 3.6 A serious concern in the Highland area is the high percentage of second homes and the impact this has on affordability of and accessibility to housing for local people. In addition to the housing land requirement there is therefore considered to be a need for further housing land in the Highland HMA to compensate for those houses which are likely to fall into the second homes market over the Structure Plan period. A 20% additional housing land allowance has therefore been made in this HMA.

Windfall

- 4.1 Windfall sites i.e. those sites which become available for development unexpectedly and are therefore not included as allocated land in the Development Plan, have in the past made a significant contribution to the housing land supply particularly in the Perth and Highland Local Plan areas. As the Local Development Plan is reviewed it is anticipated that the amount of land coming from this source will decrease, nonetheless it is expected that around 10% of the land supply will

come from 'windfall' and as a consequence the updated housing land requirement makes an allowance for this contribution towards the overall supply of housing land.

Revised housing land requirement 2008-2020

- 5.1 Table 1 below updates Schedule 1 of the Structure Plan and identifies the total additional housing land allocations required to ensure the maintenance of a continuous 5 year supply of effective housing land in the period to 2020.

Table 1 – Updated Housing Land Requirement

Planning Area	Total housing land requirement 2008-2020	Effective supply at June 2008	Additional supply²	Supply from years 6 & 7	Total additional allocations
Perth Core Perth Lowland					4,840 550
Perth¹	7,375	1,625		360	5,390
Kinross & Milnathort Landward					400 60
Kinross¹	855	250	40	105	460
Auchterarder Crieff Landward					400 340 135
Strathearn	2,055	850		330	875
Pitlochry Aberfeldy Landward					120 100 140
Highland	605 ³	205		40	360
Blairgowrie Coupar Angus Alyth Landward					415 150 100 70
Eastern	1,085	315		35	735
Perth & Kinross	11,975 ⁴	3,245	40	870	7,820

¹ 10% of the total additional housing land requirement for Kinross Planning Area has been reallocated to the Perth Planning Area

² From unallocated small sites

³ Includes a 20% additional allowance to compensate for second homes in the Highland Area

⁴ Figures have been rounded



5.2 It should be noted that although the total additional allocations amount to 7,820 part of this will be met by sites which are already identified as effective in the period 2015-2020 (approximately 1,000 units). There are also 1,800 units currently identified in the Housing Land Audit as non-effective and some or all of these may also be able to contribute to meeting the additional allocations required.