

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

Please read the notes below before completing this form. Completed forms should be returned to the Local Development Plans Team: DevelopmentPlan@pkc.gov.uk

Please complete all 4 sections of the Plan, this will allow us to process your representation accurately and quickly. If you have comments on several documents or parts of the Plan please use separate forms for each.

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1. Contact details (only representations that include full contact details are valid)

Name	Sainsbury's Supermarkets Ltd
Address and Postcode	c/o Turley Associates, 115 George Street, Edinburgh, EH2 4JN
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

3. Which part of the document are you making a representation on?

Policy ref.	Policy RC1, Glossary	or			
Site ref.		or			
Chapter	Chapter 3 and Glossary	Page no.	P29, P308	Paragraph no.	

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

P29 - Policy RC1 – Amend the first sentence to read, 'Within the areas identified as Town and Neighbourhood Centres and Retail sites, the Council will encourage uses within Class 1 (retail)...'

P308 - Glossary - Add 'Retail Sites - Sites which benefit from planning permission which make a contribution to the network of centres.'

Please include the reason for supporting the Plan/requesting a change.

Please refer to the enclosed letter.

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If making a representation on Supplementary Guidance, please state the name of the document:

3. Which part of the document are you making a representation on?

Policy ref.	<input type="text"/>	or			
Site ref.	Op12	or			
Chapter	Chapter 7	Page no.	P206, P209	Paragraph no.	<input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

P206 - Op12 - Former High School - Amendments to schedule. Please the enclosed letter which outlines the amendments proposed.

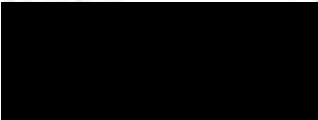
P209 - Kinross / Milnathort Proposals Map - Allocate the Sainsbury's store on Station Road as a 'Town and Neighbourhood Centre'.

Please include the reason for supporting the Plan/requesting a change.

Please refer to the enclosed letter.

[Save a copy](#)[Print](#)[Submit](#)

115 George Street
Edinburgh
EH2 4JN



10 April 2012

Delivered by E-mail

Development Plan Team
The Environment Service
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

Dear Sirs

**REPRESENTATION TO THE PERTH AND KINROSS LOCAL DEVELOPMENT PLAN - PROPOSED
PLAN (JANUARY 2012)
SAINSBURY'S SUPERMARKETS LTD**

We write on behalf of Sainsbury's Supermarkets Ltd in relation to the Proposed Perth and Kinross Local Development Plan.

Sainsbury's would like to take this opportunity to make representations in relation to (i) their existing supermarket at Station Road, Kinross and (ii) Land at Bridge Road, Pitlochry where planning permission was granted for a new supermarket in 2011.

Kinross

Sainsbury's has an existing store on Station Road adjacent to the M90 which it acquired from Somerfield a number of years ago. The site has not been identified for any particular use within the Proposed Plan. The Plan does acknowledge that the Sainsbury's store has assisted in clawing back expenditure to Kinross but there remains an identified need to continue to improve the retail offer to reduce expenditure leakage.

The Sainsbury's supermarket provides a significant contribution to retail provision in the area and continues to co-exist successfully alongside Kinross town centre and other existing retail centres. It has done much to retain expenditure within the town as recognised in the Proposed LDP. Given the Kinross context and the role and function of the existing supermarket and its location the supermarket makes a contribution to retail provision in the area that deserves planning policy protection. As such, Sainsbury's requests that the existing supermarket is recognised as a retail location in the LDP with a designation as a 'Town and Neighbourhood Centre'. This would provide the supermarket with some degree of status as a retail location and some policy protection against new retail development.

There is limited opportunity to continue to improve the retail offer in Kinross town centre to reduce expenditure leakage. The only opportunity site identified within the town centre is Op24 – Kinross Town Hall. The plan states that the listed building would be suitable for conversion to accommodate one or more of the following uses: community, retail, office, hotel, restaurant or residential. Such a conversion is unlikely to provide retail development of a sufficient scale to improve the retail offer required. Other opportunity sites have been identified but at out of centre locations. These include 'Op10 – Market Park' and 'Op12 – Former High School'. Site Op10 is to be retained for the National Curling Academy and if not required for this use, it is to remain as green space and therefore, retail use would not be acceptable.

In relation to site Op12, the plan states that potential uses include employment, retail, hotel, community or residential. However, the site lies within a Conservation Area with listed buildings on the site to be retained. This is reflected in the Council Conservation Area Character Appraisal. It presents a constrained site for a retail operator to develop anything other than a small format notwithstanding concerns over impact on the town centre and other established retail locations (eg Station Road, Sainsbury's). We would therefore request that the Proposed LDP provides a limit on the scale of retail development proposed and provides further requirements that any development on this site must satisfy including taking into account national planning policy SPP2010.

Pitlochry

Sainsbury's gained planning permission for a new supermarket with associated landscape treatment and engineering works on 1 April 2011 on land at Bridge Road, Pitlochry. The land is identified as a 'retail site' in the Proposed Plan. Sainsbury's support this allocation. However, the Proposed Plan is not clear on where 'retail sites' sit within the network of centres and which planning policies apply.

In Section 3.4 of the Plan on Retail and Commercial Development existing policy should be suitably amended to make clear what type of retail development is acceptable and the degree of protection offered to a 'retail site' allocation. A definition should be added to the glossary.

Conclusion

We would ask that the following suggested changes are taken into account in finalising the LDP.

Kinross – suggested changes

1. Proposals Map - Town and Neighbourhood Centres - The existing supermarket (Sainsbury's Supermarket, Station Road) is identified as a 'Town and Neighbourhood Centre'.
2. 'Op12 – Former High School' – Amend schedule (page 206) to include the following additional 'Site Specific Developer Requirements – 'Retail development should be limited to less than 500sqm gross' or 'All retail development must satisfy policy RC4 of the Local Development Plan'. In order to properly take account of national planning policy amend existing Developer Requirements to state, 'There is a presumption in favour of retention of

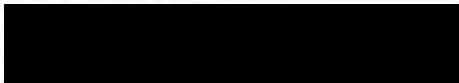
listed buildings and applications to demolish listed buildings must be justified taking into account national planning policy' rather than 'New designs should consider the retention of Listed Building.'

Pitlochry – suggested changes

3. Policy RC1 – Amend the first sentence to read, 'Within the areas identified as Town and Neighbourhood Centres and Retail sites, the Council will encourage uses within Class 1 (retail)...'
4. Add to LDP Glossary – 'Retail sites – Sites which benefit from planning permission which make a contribution to the network of centres'.

We would be happy to provide further information on this representation and please keep us informed of progress on the LDP preparation.

Yours sincerely

A black rectangular box redacting the signature of the sender.

Turley Associates

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Address and Postcode	c/o Turley Associates, 115 George Street, Edinburgh, EH2 4JN
Telephone no.	
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Policy ref.	<input type="text"/>	or THE
Site ref.	<input type="text"/>	or ATTACHED
Chapter	<input type="text"/>	LETTER
Page no.	<input type="text"/>	DATED
Paragraph no.	<input type="text"/>	10 APRIL 2012

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4. What is your representation?

Are you supporting the Plan? ☐

Or

Would you like to see a change to the Plan? Please state this change.

Please refer to the attached letter dated 10 April 2012.

Please include the reason for supporting the Plan/requesting a change.

Please refer to the attached letter dated 10 April 2012.

Save a copy

Print

Submit

TURLEYASSOCIATES

115 George Street
Edinburgh
EH2 4JN

10 April 2012

Delivered by Email

Local Development Plan Team
The Environment Service
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth PH1 5GD

Dear Sirs

**REPRESENTATION: SAINSBURY'S SUPERMARKETS LTD
PROPOSED LOCAL DEVELOPMENT PLAN (JANUARY 2012)**

We write on behalf of Sainsbury's Supermarkets Ltd (Sainsbury's) and wish to make the following representation to the Proposed Local Development Plan (January 2012).

By way of background, Sainsbury's currently has 59 stores in Scotland (including Locals) and employs approximately 7,500 people. Sainsbury's has one main store within the LDP area, at Kinross. Planning permission has been granted though for a new supermarket at Pitlochry and in November 2009, Sainsbury's and Perth City West submitted a planning application for a new supermarket and petrol filling station at the former auction mart at Huntingtower in west Perth (PKC ref. 09/02126/FLM). A planning application for an alternative petrol filling station was submitted in January 2012 (PKC ref. 12/00392/FLL). To date, both applications are undetermined by the Council.

Representation 1

Perth Spatial Strategy – Transport Infrastructure (para 5.1.17, page 70-71)

In order to prevent the increased congestion on the Crieff Road area of Perth, the Proposed Plan places an 'embargo' on further planning permissions for development for sites of 0.5Ha or more outwith Perth on the A85 corridor, until such time as the construction of the new A9 / A85 junction has commenced.

This 'blanket' embargo on major new development is not considered justified. For example, the embargo:

- Prevents acceptable development coming forward in the A85 corridor and being granted planning permission.
- Presupposes that any development will cause increased congestion. There may be some development that creates no worsening of congestion. In such cases permission should not be embargoed or resisted by the Council on traffic grounds.

- Prevents development that may help deliver the new A9 / A85 junction through physical works and / or a contribution land or financial contribution.

If an embargo continues to be part of the LDP then it should only apply to planning applications submitted once the local plan has been adopted. It would be unreasonable to apply it to current planning applications for example.

It should also be confirmed in the LDP that the expression 'Land outwith Perth on the A85 corridor' means land beyond the settlement; that is, land on the north side of Crieff Road beyond the A9, and land on the south side of Crieff Road to the west of the Perth West housing allocation site. This would make sense as it would then exclude land within the settlement and land that has been previously developed (including brownfield land).

Suggested Change:

Delete paragraph 5.1.17(2), or failing that,

Reword 5.1.17(2) to:

'Development for sites of 0.5Ha or more outwith the settlement boundary of Perth on the A85 corridor (ie. the settlement includes allocated sites) which exacerbate congestion on the Crieff Road area will generally be refused planning permission, until such time as the construction of the new A9 / A85 junction has commenced, unless development helps bring forward the new A9 / A85 junction. The embargo shall not apply to planning applications submitted before the Local Development Plan is adopted'.

Representation 2

Commercial Centres (para. 3.4.3 Retail and Commercial Development, page 29; and para. 5.2, page 75): ASDA in Dunkeld Road, Perth

The Proposed LDP identifies 'ASDA in Dunkeld Road, Perth' as a commercial centre, 'in line with national guidance' (paragraph 5.2, PLDP). The Proposed Plan does not define a 'Commercial centre' or set out their individual role and function.

SPP2010 states that,

"Commercial centres are distinct from town centres as their range of uses and physical structure makes them different in character and sense of place. They generally have a more specific focus on retailing or on retailing and leisure uses. Examples of commercial centres include out-of-centre shopping centres, commercial leisure developments, mixed retail and leisure developments, retail parks and factory outlet centres" (paragraph 54, SPP).

In the Perth context and given the proposed network of centres in the city, it is not considered that the proposed commercial centre at Dunkeld Road, which includes little else apart from an ASDA

foodstore, satisfies a 'commercial centre' definition. It should not therefore be included in the list of Commercial Centres in the LDP.

Suggested Change:

Delete 'ASDA in Dunkeld Road, Perth' from the list of Commercial Centres.

Representation 3

Commercial Centres (para. 3.4.3 Retail and Commercial Development, page 29; and para. 5.2, page 75, Proposals Map): Crieff Road, Perth

The Proposed LDP proposes a Commercial Centre at Crieff Road.

A site at Crieff Road including the former Auction Mart and Dobbies Garden Centre is identified as an 'Existing employment site' in the Proposed LDP where proposed policy ED1A seeks to retain in such uses. This area has changed considerably over the last 15 years including the development of the Dobbies Garden Centre, a hotel and restaurant. The use of the auction mart has also ceased and it has been vacant for some years. The former auction mart comprises a large vacant site including substantial buildings which use has ceased. The site lies within the Perth settlement (as identified in the Proposed LDP) and outwith any environment or conservation designations (eg. AGLV).

Given the current uses close to the former auction mart (garden centre, hotel and restaurant) as well as its close proximity to the Proposed Crieff Road Commercial Centre, the 'existing employment site' should be redesignated and be included within that Commercial Centre with a focus on retail uses.

There is no clear justification why the industrial units on south side of Crieff Road between Strathtay Road at the eastern end of the Proposed Crieff Road Commercial Centre are included within the Commercial centre. An employment designation would be more appropriate.

Suggested Change:

Revise boundary of Proposed Crieff Road Commercial Centre on Proposals Map to:

- i) Include land at Crieff Road on west side of A9 including former auction mart, Dobbies garden centre, hotel and restaurant, and
- ii) Exclude land (eg industrial units) situated between Crieff Road and Strathtay Road east of Newhouse Road.

Representation 4

Opportunity sites: Former Auction Mart, Crieff Road, Perth (page 80, omission)

If the suggested change (representation 3) to include the 'existing employment site' at Crieff Road is not included as a 'commercial centre' then the site of the former auction mart on Crieff Road should be reallocated as an 'Opportunity site' for retail development. It would provide appropriate encouragement to the development of the site particularly given its urban brownfield status.

The former auction mart site accords with the principles of a brownfield site. TAYplan and SPP encourage the reuse of brownfield land for new development and planning policies should support and promote such development:

"Decisions on the location of new development should, amongst other matters, promote regeneration and the re-use of previously developed land..." (para.38, SPP)

"Redevelopment of urban and rural brownfield sites is preferred to development on greenfield sites" (para. 80, SPP).

"Previously developed land (also referred to as brownfield land) is a potential source of sites for new development and planning authorities should support and promote proposals to bring vacant or derelict land back into productive use for development or to create more attractive environments." (para. 48, SPP).

"Prioritising land release within principal settlements ahead of land elsewhere is integral to ensuring that the majority of growth is concentrated there. Reusing previously developed (brownfield) land and buildings (particularly listed buildings) will play an important role in this by making the most efficient and effective use of land. Therefore, this Plan advocates that developing land within principal settlements (brownfield or greenfield that is not protected for heritage, environmental or recreation purposes) is preferable to developing land outside of them even where this is brownfield" (Page 8, TAYplan).

Identifying the former auction mart as an Opportunity site in the LDP for retail and associated development with suitable developer requirements would therefore provide appropriate encouragement for the development of this substantial urban brownfield site. It would also recognise the need for some retail development within this area of Perth given the significant housing and employment growth identified in west / northwest Perth in TAYplan and the Proposed LDP. It could also assist in delivering the strategic A9 / A85 junction improvements identified in the LDP.

Suggested Change:

Include the following site as an additional Opportunity Site and alter Proposals Map accordingly:

- Former Auction Mart, Crieff Road as an Opportunity Site

- Location: Former Auction Mart, Crieff Road
- Size: 6.0 ha
- Uses: Retail and petrol filling station
- Site Specific Developer Requirements:
 - Improvements to Crieff Road
 - Junction improvements A9 / A85

Representation 5

Policy ED1A: Employment and Mixed Use Areas (page 25)

If the suggested changes to the former auction mart area (commercial centre and failing that an opportunity site) is not accepted (representations 3 and 4) then the following change should be adopted in the LDP.

'Employment' uses are not defined although the proposed policy ED1A does indicate that proposals for retail uses in employment areas will not generally be acceptable. This would suggest that the Council's meaning of 'employment' uses include retail and hotel uses and more than simply business and industrial uses.

As contained in SPP2010, Sainsbury's believes that a positive approach should be taken in the LDP towards development that could contribute to sustainable economic growth. Retail development, both in town centres and elsewhere, provides major employment opportunities, generates wealth in an area and helps attract further investment. The retail industry is one of Scotland's largest business sectors. This is a particularly relevant issue at this time as new retail development continues to be active despite difficult economic circumstances. This policy approach should be incorporated into the LDP.

So, the reference to generally not accepting retail development in employment areas should be deleted; to encourage employment uses on one hand but generally resist a particular use that provides a significant amount of new jobs to an area is misplaced and inconsistent with the purpose of the policy. Other policies in the Proposed LDP address retail issues.

Suggested Change:

Policy ED1A; delete criterion (d).

We would ask that this representation is taken into account in the finalisation of the LDP.

Yours sincerely



Turley Associates

CC: Jeff Wilson

Sainsbury's Supermarkets Ltd

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Address and Postcode	c/o Turley Associates, 115 George Street, Edinburgh, EH2 4JN
Telephone no.	[REDACTED]
Email address	[REDACTED]

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Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="Chapter 6, Proposals Map"/>	Page no.	<input type="text" value="P182, P183"/>	Paragraph no.	<input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

We request that the Strathtay settlement boundary be extended to include land owned by the Caledonian Trust Plc. Please see enclosed location plan for reference.

Please include the reason for supporting the Plan/requesting a change.

Please see enclosed letter dated 10 April 2012 which sets out the reasons in support of the proposed change.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

Save a copy**Print****Submit**

TURLEYASSOCIATES115 George Street
Edinburgh
EH2 4JN

10 April 2012

Delivered by Email

Local Development Plan Team
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

Dear Sir/Madam

**CALEDONIAN TRUST PLC
PERTH AND KINROSS PROPOSED LOCAL DEVELOPMENT PLAN (JAN 2012)
SECTION 6.15 GRANDTULLY, STRATHTAY AND LITTLE BALLINLUIG (PAGE 182)
LAND SOUTH WEST OF GREENBANK, AT STRATHTAY**

We write with reference to the consultation on the Proposed Local Development Plan.

On behalf of Caledonian Trust Plc, we wish to submit the following representation in relation to a site at Strathtay. Our previous representation to the Council was at the Main Issues Report stage (dated 11 February 2011).

The site is not currently identified within the Grandtully, Strathtay and Little Ballinluig settlement boundary within the Proposed Local Development Plan. This representation requests that the land identified on the enclosed drawing (hatched red and green) be included within the village settlement boundary. This request was also put forward in our earlier representation which, for the purposes of the settlement boundary, remains relevant.

The site is within the Grandtully and Strathtay Conservation Area and is bounded on the north, east and part of its southern boundary by the Proposed LDP settlement boundary. For the most part, the site is a field of rough grass and is situated to the south of the public road which runs in an east west direction through the village. The site slopes gently from the public road at the north west of the site down to the south of the site, generally falling by 4.5m over the 34m distance. There is an embankment adjacent to part of the road frontage of the site and tree belt which partially contain the site in some directions.

There are residential properties located beyond to the north, north-east, east and south-east of the site, along with a telephone exchange building. Also planning permission has recently been obtained for residential development on three nearby sites which are relevant to this representation:

1. In May 2011 planning permission was granted for two houses with garages on land south west of Greenbank adjacent and to the north east of the subject site (PKC ref. 10/00180/FLL)
2. In November 2011 planning permission was granted for three houses, garage and associated access drive on land 90 metres south west of Dunellan to the east of the subject site (PKC ref. 11/01248/FLL).
3. In 2008 planning permission was granted for the erection of three detached dwellinghouses on land to north east of Dalraoich to the north east of the subject site (PKC ref. 07/02010/FUL & 08/00991/MOD).

The requested revised settlement boundary would therefore represent a continuation of the existing settlement and takes into account the changed nature and character of the settlement plots brought about these planning permissions on land to the north, east and north east. A drawing showing the site layout sites 1 and 2 is attached.

On looking at the current settlement plan, the site also lies within a gap in the settlement boundary with land to the north, west and east included within the boundary. This remaining area is well screened from wider views and lends itself to a natural extension to the village envelope, without impacting upon the overall character and setting of the conservation area. The previously submitted aerial photograph (enclosed) clearly illustrates that this site is a natural extension to the settlement boundary contained by existing woodland.

The site lies within the Grandtully and Strathay Conservation Area. The area designated within the Grandtully and Strathay Conservation Area Appraisal extends southwards beyond the current settlement boundary to the banks of the River Tay. Thus, recognising that this settlement is not as constrained as the current settlement boundary suggests.

Suggested Change:

Amend settlement boundary of Grandtully, Strathay and Little Ballinluig to include additional land hatched in red and green on attached plan and alter Proposals Map accordingly.

We would ask that this representation is taken into account in the finalisation of the LDP.

Yours sincerely


Turley Associates

Encs.

cc Mr M Baynham – Caledonian Trust



This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.



client	Caledonian Trust PLC
project	Proposed Housing Site Strathtay
drawing	Site Constraints Plan
iain gaul architects	

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1. Contact details (only representations that include full contact details are valid)

Name	Caledonian Trust Plc
Address and Postcode	c/o Turley Associates, 115 George Street, Edinburgh, EH2 4JN
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

3. Which part of the document are you making a representation on?

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="Chapter 6, Proposals Map"/>	Page no.	<input type="text" value="p173"/>	Paragraph no.	<input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

An allocation for housing or failing that an Opportunity Site with capacity noted for nine dwellings on the land owned by the Caledonian Trust Plc at Balnaguard. Please see enclosed location plan for reference.

Please include the reason for supporting the Plan/requesting a change.

Please see enclosed letter dated 10 April 2012 which sets out the reasons in support of the proposed change.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

Save a copy**Print****Submit**

TURLEYASSOCIATES115 George Street
Edinburgh
EH2 4JN

10 April 2012

Delivered by EmailLocal Development Plan Team
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

Dear Sir/Madam

**CALEDONIAN TRUST PLC
PERTH AND KINROSS PROPOSED LOCAL DEVELOPMENT PLAN (JAN 2012)
SECTION 6.7 - BALNAGUARD (PAGE 173)
LAND AT ABERFELDY ROAD, BALNAGUARD**

We write with reference to the consultation on the Proposed Local Development Plan.

On behalf of Caledonian Trust Plc, we wish to submit the following representation for land at Balnaguard. Our previous representations to the Council on this site were at the pre-Main Issues Report stage (dated 30 June 2010) and at the Main Issues Report stage (dated 11 February 2011). A site plan was submitted with these letters and remains relevant.

The site is currently identified as a housing opportunity (H25) within Highland Area Local Plan (2000) with capacity for up to 10 dwellings. The Proposed Local Development Plan shows the site as unallocated. We maintain that the site should be identified as a site for residential development or, failing that, as development opportunity for residential development in the new Local Development Plan.

The Site

The site is located to the north of the Balnaguard Burn, south of Aberfeldy Road (B898), west of Balnavert Farm, Balnaguard and east of existing residential dwellings. The site is located within the Balnaguard settlement boundary of the Proposed Local Development plan which is supported.

The site is currently grass/shrubland which is currently underused with the exception of a semi-derelict stone shed. There are a number of poor quality, self seeded trees on the site but none of these are of any merit or covered by a Tree Preservation Orders (TPO's).

Proposal

The site presents an effective opportunity for residential development in the short term. Two planning applications have been submitted for residential dwellings on the site by Caledonian Trust Plc. In June 2008 a planning application (PKC ref. 06/02407/FUL) was refused by Perth and Kinross Council Planning Committee, contrary to the officer recommendation, on detailed design grounds (eg. scale, form, materials, density) and the potential for the development to be detrimental to residential amenity and village character. An appeal against the decision was made which was dismissed in December 2008 (DPEA ref P/PPA/340/699). A copy of the DPEA planning appeal decision is attached. In both cases the principle of residential development has been accepted.

On 22 July 2009, the Council Development Control Committee resolved to approve a revised planning application for nine dwellings (PKC app. ref. 09/00528/FLL) subject to a Section 75 planning agreement on financial contributions towards affordable housing. A copy of the application site layout drawing, report to and minutes of the Committee on 22 July 2009 are attached. Whilst the Section 75 agreement is now substantially agreed it has not yet been completed. The reasons for any delay do not have any bearing upon the effectiveness of this site for residential development. Circumstances have not significantly changed since the Council resolved to grant planning permission in July 2009.

The principle of residential development has been accepted by the Council including in the adopted local plan. In more recent years the Council has resolved to grant full planning permission for a residential development for nine houses. Detailed matters are acceptable and can be otherwise addressed by planning conditions. Given the site is suitable and available for development, it is requested that the site at Balnaguard should remain as an opportunity site for housing – either as a site for 'residential development for nine houses' or, failing that, an 'opportunity site' for residential development in the LDP.

Suggested Change:

Include as a '**Residential Site**', and alter Proposals Map accordingly:

- Location: Land south of B898, Aberfeldy Road, Balnaguard
- Size: 0.71 ha
- Number: 9 houses

Failing that, include as an '**Opportunity Site**', and alter Proposals Map accordingly:

- Location: Land south of B898, Aberfeldy Road, Balnaguard
- Size: 0.71 ha
- Uses: Residential (9 houses)

We would ask that this representation is taken into account in the finalisation of the LDP.

Yours sincerely,



Turley Associates

Encs

cc Mr M Baynham – Caledonian Trust Plc

This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.

From: LINDA MCADAM [REDACTED]
Sent: 10 April 2012 15:07
To: TES Development Plan - Generic Email Account
Cc: Julie Robertson
Subject: TUMMEL BRIDGE LOCAL DEVELOPMENT PLAN
Follow Up Flag: Follow up
Flag Status: Green
Attachments: Email002 (2).jpg; Email003 (2).jpg

Dear Sir/Madam

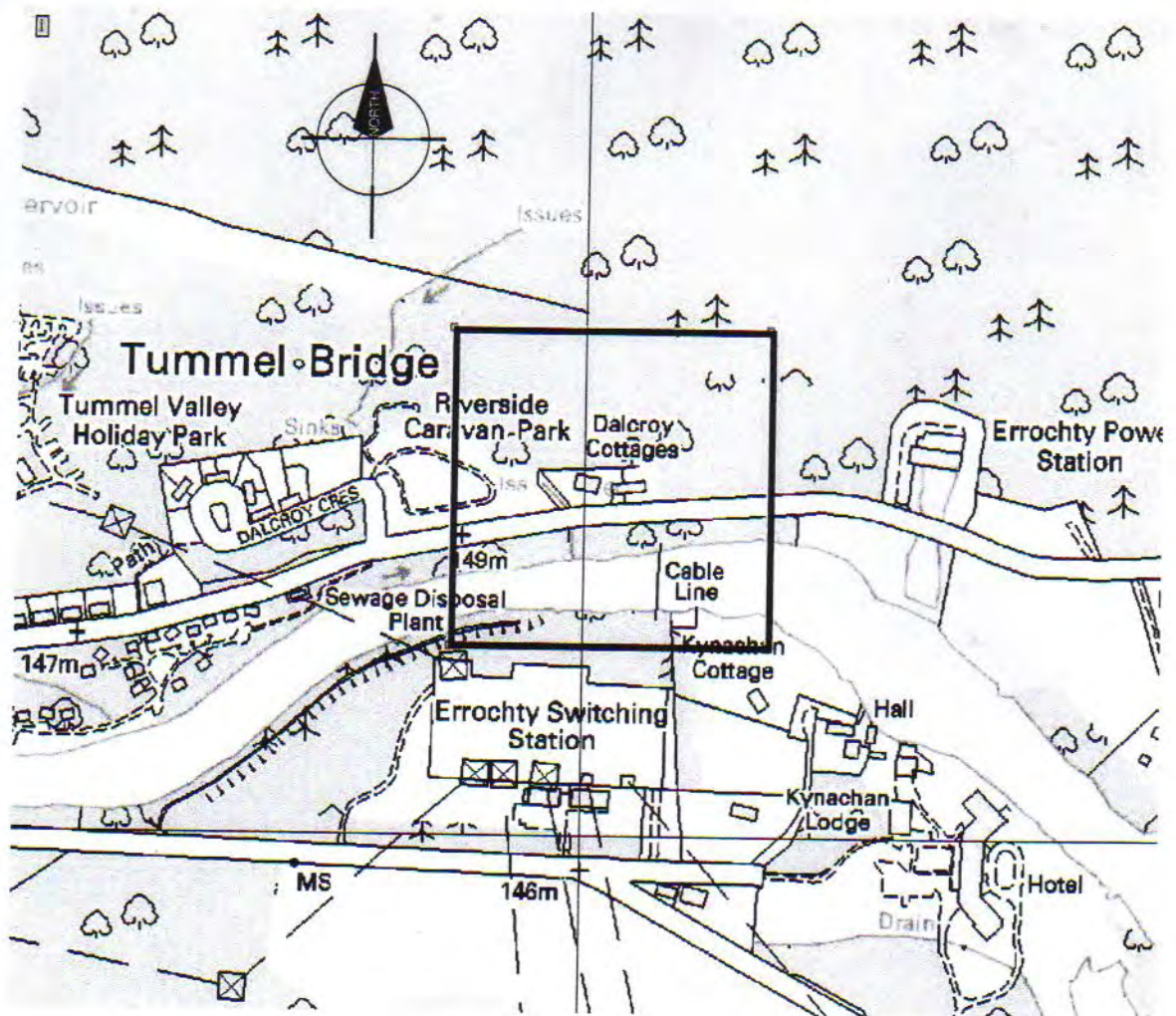
I write this e mail to confirm that I wish the following change be made to the Proposed Plan.

With reference to the Tummel Bridge area, Page 195, Chapter 6.23 part of the proposed plan I request that the area of land of approximately 708 sq metres adjacent to No 4 Dalcroy Cottages may be included in terms of the settlement boundary. The reason for this request is an intention to build a small bungalow on this garden ground in the near future. Please find attached two plans of the area in question.

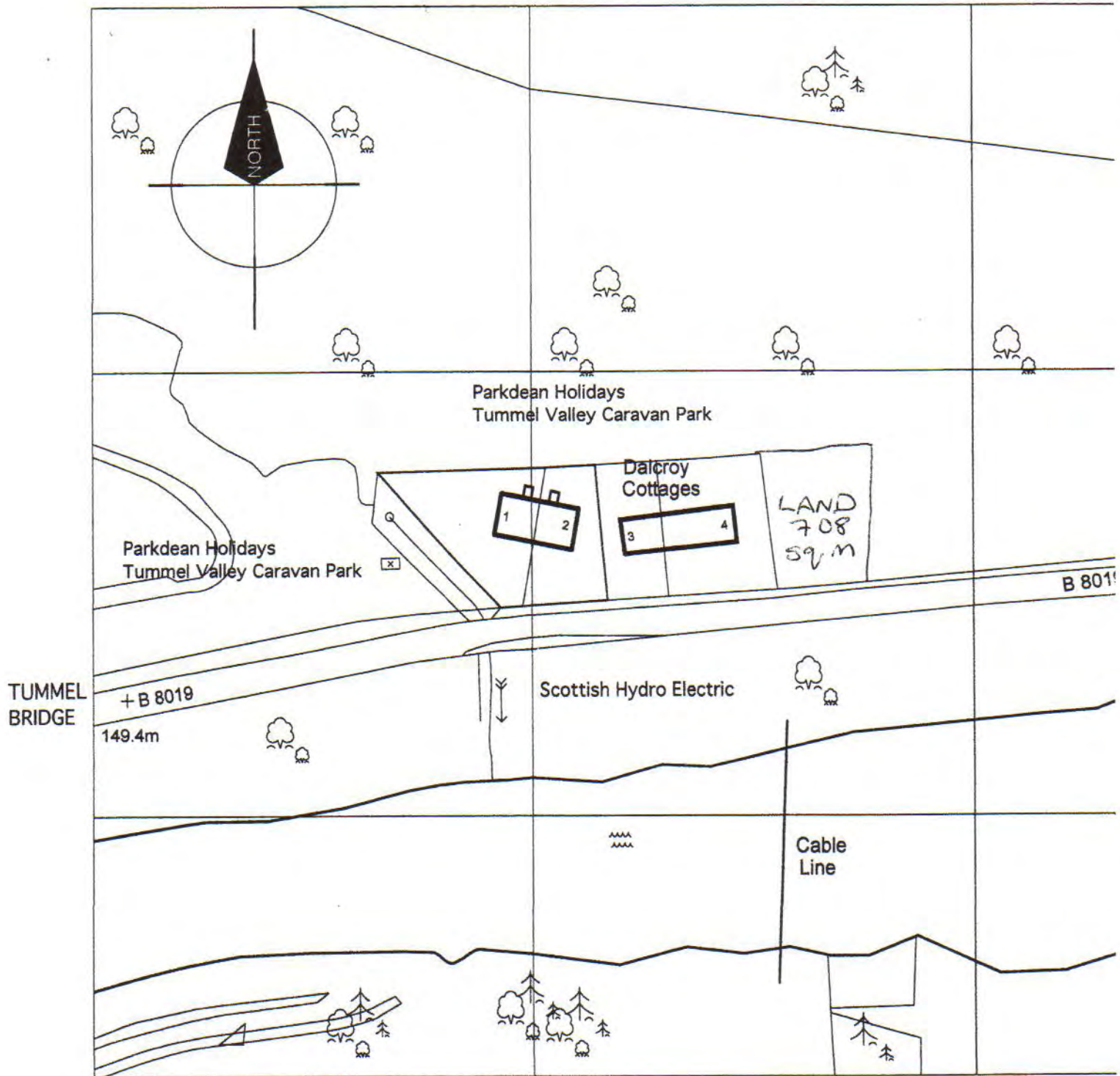
I look forward to an acknowledgement of my request.

Linda McAdam (Mrs)

[REDACTED]



GENERAL LOCATION NTS



LOCATION PLAN 1:1250

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

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1. Contact details (only representations that include full contact details are valid)

Name	Mr Ross Gardiner
Address and Postcode	3B Robertson Crescent Pitlochry PH16 5HD
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

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Site ref.	<input type="text"/>	or
Chapter	<input type="text"/>	Page no. <input type="text"/> Paragraph no. <input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

Yes I would like to see changes to the plan - please see below

Please include the reason for supporting the Plan/requesting a change.

Here are my concerns

Chapters 4 and 6. I do not accept the need or desirability of anything like as many houses to be built in Highland Perthshire (e.g. 6.1.9) in general or in Pitlochry in particular (e.g. 6.1.13) over the review period. The proposed use of greenfield sites in Pitlochry conflicts with the need to protect character and landscape which are very important to the area and to Pitlochry in particular. I have also concerns as to the likelihood of adequate infrastructure being put in place in Pitlochry to service all these additional houses and the additional people who would move into the area. I now realize that these comments should also have been made in response to what I now find was an important earlier consultation – the TAYplan Strategic Development Plan consultation. However, I was unaware of the earlier consultation, or its significance.

Page 166 identifies a site adjacent to Robertson Crescent in Pitlochry for development for 90 houses. The area of ground involved is mainly agricultural and rises above the road connecting Pitlochry and Moulin and is clearly visible from key locations in Pitlochry and Moulin. It is therefore of importance to Pitlochry and Moulin's landscape and character. In my view, development of the site for housing, particularly any sort of dense, unsympathetic development, covering most of the site, would impact unacceptably on Pitlochry's landscape and character. The underpinning Pitlochry Housing report issued in 2010 or 2011 indicated a Council view that the site makes a key contribution to the Pitlochry landscape. Pitlochry is a tourist town which relies on its landscape and character to attract people to Pitlochry, making it particularly important that these should be maintained.

SNH too has reservations about development of this site (page 3 in the Key Agency Comments report again issued in 2010 or 2011) "Development is most appropriate in the western leg of the site between the golf course and the existing edge of the town..... Housing elsewhere would be more widely visible, rising above the shoulder of the 'bowl' and would merge Pitlochry with Moulin – losing the distinct character of the latter. Should the western part be developed, would need to ensure that there are defensible boundaries – tracks, woodland etc. to prevent further expansion."

The Pitlochry Housing report referred to earlier concluded that 3.5ha of the total 5 ha could be developed with landscaping for medium density housing (capacity 38-66 dwellings). What is now proposed with 90 houses will be a denser less sympathetic development which would not offer any adequate protection to the character and landscape of this part of Pitlochry and I therefore object to it. I note that the Housing Background Paper which accompanies the Proposed LDP gives the proposed development as 70 (rather than 90) houses phased 2017-20, so there seems to be some confusion over the proposed number houses. Even 70 houses would seem inappropriate to me for the site.

Another issue I have concerns over with the proposed development of this site is whether the likely access route can cope safely with the additional traffic that would result.

I would also note that the part of the site near the Moulin Burn has Japanese knotweed and that any developer will need to address this issue, although it is not listed in the Specific Developer Requirements

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

Save a copy**Print****Submit**

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1. Contact details (only representations that include full contact details are valid)

Name	Andrew McNab MRTPI MRICS
Address and Postcode	Colliers International 39 George Street Edinburgh EH2 2HN
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☒

2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
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If making a representation on Supplementary Guidance, please state the name of the document:

3. Which part of the document are you making a representation on?

Policy ref.	<input type="text" value="Various policies - see enclosed document."/>			or	
Site ref.	<input type="text"/>			or	
Chapter	<input type="text"/>	Page no.	<input type="text"/>	Paragraph no.	<input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☐**Or**

Would you like to see a change to the Plan? Please state this change.

Please see enclosed document

Please include the reason for supporting the Plan/requesting a change.

Please see enclosed document

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St Catherines Perth 1 Ltd

Land at St Catherines Retail Park South

Perth & Kinross Council

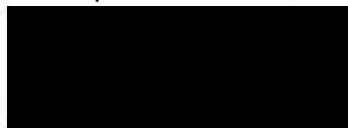
Perth & Kinross Local Development Plan:

Proposed Plan Consultation

APRIL 2012



Contact:
Andrew McNab
Senior Planner
Development Solutions – Planning



39 George Street
Edinburgh
EH2 2HN

COLLIERS INTERNATIONAL UK PLC

Company registered in England and Wales no. 4195561

Registered Office:

9 Marylebone Lane

London W1U 1HL



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Director	Anthony Aitken MRTPI
Approved by	Anthony Aitken MRTPI
Date Approved	10 April 2012

TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	PROPOSED PLAN CONSULTATION	1
1.2	OUTLINE OF REPRESENTATION	1
2	PLANNING POLICY CONTEXT	3
2.1	SCOTTISH PLANNING POLICY	3
2.2	TAYPLAN	3
3	PROPOSED PLAN OBJECTIONS	5
3.1	PERTH CITY CENTRE BOUNDARY	5
3.2	FUTURE ROLE OF THE RETAIL PARK	6
3.3	POLICY RC3: COMMERCIAL CENTRES	6
3.4	POLICY RC4: RETAIL AND COMMERCIAL LEISURE PROPOSALS	6
4	CONCLUSIONS	8

APPENDIX 1

APPENDIX 2

1 INTRODUCTION

1.1 PROPOSED PLAN CONSULTATION

Colliers International represents St Catherine's Perth (1) Limited who owns the southern part of St Catherine's Retail Park in Perth. A site plan outlining my client's ownership is included within Appendix 1 of this document.

Our clients purchased the Retail Park in May 2011 and welcome the opportunity to participate in the Perth and Kinross Local Development Plan Proposed Plan (PKLDPPP) consultation process and we have a number of comments/objections to make regarding the proposals map and also the content of the proposed plan.

The owners of the Retail Park propose to embark upon a refurbishment program of the existing retail units which are tired and dated and require upgrading. It is also out clients' intention to extend and modernise the Retail Park to improve the shopping experience for those who visit. Part of this improvement will include the reorganisation of the existing car park which is fragmented and poorly laid out and we have been in discussions with Wm Morrisons Supermarkets, the other joint user of the car park in relation to this.

In conjunction with the proposed refurbishment program our clients retained retail agents have identified retailers with demand for larger floorplates than are currently available in Perth City Centre and as such our client will be seeking some alterations to the goods range restrictions to allow for those operators to locate on the retail park. This will be undertaken in a similar form than was approved by Perth and Kinross Council for the northern part of the Retail Park which is under separate ownership whereby the relaxation of the goods range restrictions will be directly linked to the proposed improvements to the existing retail units. Discussions regarding this matter have been undertaken with officers of both the Development Management and Forward Planning Departments of the Council.

1.2 OUTLINE OF REPRESENTATION

The main thrust of our client's representation is that that:

- The town centre boundary of Perth Centre (City Centre Secondary Uses boundary) should be redrawn to include St Catherines Retail Park South as it forms an effective part of Perth City Centre and is attractive to retailers who currently wish to be located in a central retail area, however cannot find suitable accommodation of a certain size within the existing town centre. This was recognised in paragraph 4.3.29 of the Main Issues Report.

- Neither the proposed TAYPLAN nor the Proposed Local Development Plan outlines the role of each of the network of retail centres which is contained within it as required by the SPP.
- The Main Issues Report identified that St Catherine's Retail Park is in need of refurbishment and that the Council had agreed to extend the range of goods which can be sold from the park and this was linked to the redevelopment and improvement of the park. This statement should be reiterated within a statement on the role of the retail park within the retail hierarchy.
- We have several other comments/objections to make on the proposed plan and these are outlined within this report below.

2 PLANNING POLICY CONTEXT

2.1 SCOTTISH PLANNING POLICY

The Scottish Government produced a consolidated statement of Planning Policy in 2010 and this contains a section on town centres and retailing. The SPP is the Government's view on planning policy matters and forms the policy background for the creation of Development Plans (Strategic Development Plans and Local Development Plans) and also is a material consideration in the determination of planning applications.

In particular paragraph 53 states that 'development plans should identify a network of centres, and explain the role of each centre in the network. The network will, depending on circumstances, include town centre, commercial centres and other local centres, and may take the form of a hierarchy'.

Paragraph 55 states that 'the network of centres identified in the development plan will provide a context for the assessment of proposals for new development. Where proposals support a centre's role and function, as identified in the development plan, there is no requirement to provide a detailed assessment of need. Investment to maintain and improve commercial centres should be supported where the centres are part of the network and where such investment will not undermine town centres.'

Paragraph 56 states that 'the development plan should enable gaps and deficiencies in provision of shopping, leisure and other services to be remedied by identifying appropriate locations for new development and regeneration...opportunities for improving the physical quality and sustainability of town and commercial centres should also be identified in the development plan, providing the framework for the development of town centre strategies'.

There is therefore a significant amount of Scottish Government planning guidance on how development plans should treat town centres and commercial retail centres and the proposed plan should reflect this.

2.2 TAYPLAN

The proposed TAYPLAN is the overarching Strategic Development Plan (SDP) with which the PKLDPPP Plan must comply. The SDP is currently with the Scottish Ministers for their considerations of outstanding objections and is therefore reasonably well advanced in terms of its materiality for planning decisions and to inform the emerging LDP. The proposed SDP sets out how the Dundee and Perth Region will develop over the next 20 years.

Page 20 makes reference to St Catherines Retail Park and other 'commercial centres' and makes a generic statement referring to the specialisation of these centres for bulky goods, leisure and that they are often co-located with supermarkets. However it is notable that the commercial centres listed in Dundee and Perth vary in geographic proximity to town centres and in the range of goods they are able to sell.

In Dundee, the Kingsway East and West Retail Parks have a bulky goods focus, whereas the Gallacher Retail Park, on the edge of Dundee City centre, has a planning permission which allows more 'open' Class 1 Retailers who are commonly found in town centres but who are unable to find the appropriate sized floorplates within the town centres. There is, it is believed, a distinction to be drawn in the roles of the bulky goods retail parks, and the edge of centre town/city retail parks which exist within the SDP area, particularly given the ability for shoppers to undertake linked trips on foot between the town centres and St Catherines and at the Gallacher Retail Park. In particular St Catherines and the prime retail frontage of Perth are easily accessible to each other on foot. Indeed St Catherines Retail Park south is closer to the City's railway station than the prime core area and therefore forms a valuable retail link from the prime high street to the station. Therefore in planning terms, and in its function as a Retail Centre, St Catherines Perth south should be viewed differently to the out-of-centre retail parks such as found on the Kingsway in Dundee.

TAYPLAN also identifies the sequential approach as outlined in the consolidated SPP:

- Town centre
- Edge of town centre
- Other commercial centres identified in the development plan
- Out of centre locations that are or can be made easily accessible by a choice of transport modes

Page 21 of the Proposed SDP states that '*Local Development Plans should identify the specific boundaries for each town centre identified in table 2 (Perth City Centre is included) and can identify roles for 'other service centres' beneath the regional hierarchy; including 'commercial centres' for leisure, bulky goods and other retail.*'

3 PROPOSED PLAN OBJECTIONS

3.1 PERTH CITY CENTRE BOUNDARY

Our clients believe that St Catherines Retail Park South offers a unique opportunity for Perth and Kinross Council. There are very few retail parks across the UK which form an extension to the City Centre and offer large retail floorplates to accommodate retailers currently unrepresented yet are located only a short walk away from the prime shopping area, en route to the railway station.

The main issues report into this proposed plan identified that the Retail Park can provide *'opportunities for comparison goods which cannot be accommodated in the City Centre'* in paragraph 4.3.29. Further the MIR also stated that if *'more sites for bulky goods are required, any needs could be accommodated at Glenearn Road where there are some existing retail units'*.

St Catherines Perth South already has permission to sell many Class 1 goods and as such has already been recognised by the Council as being a more city centre type location. Our clients believe that the retail park's future role will be to accommodate those retailers who wish to locate in the city centre but who are unable to find suitable accommodation in the traditional core. Given its proximity to the city centre, its future function will be as an extension of the city centre retail offer.

Indeed the lack of exiting city centre opportunities for many new retailers to the Perth market is limited and as you will see from the information provided in Appendix two the current average vacant floor area in Perth City Centre is only 1,800 sq ft. Demand has already been expressed in my clients scheme from retailers who consider St Catherines as a city centre location but one that can offer the space configuration they require.

To reflect the future role of the park our clients believe that the city centre boundary should be redrawn to include the St Catherine's Retail Park (South) within the boundary. Indeed, there is an argument that the boundary should be extended further to include St Catherine's Retail Park (North). This will reflect the likely future role and function of the retail park and also paragraph 4.3.29 of the Main Issues Report.

Our clients therefore **object** to the current city centre boundary (City Centre Secondary Uses) as drawn on the proposed plan proposals map. A suggested alternative boundary is included in Appendix 1.

3.2 FUTURE ROLE OF THE RETAIL PARK

As outlined above the proposed TAYPLAN states that Local Development Plan can outline the role of commercial centres. Our clients believe that the future role of the Retail Park should be defined within the text of the plan and therefore **object** to the non-inclusion of a statement outlining the future role of the park as required by Scottish Planning Policy.

We suggest that the future role of the retail park should be outlined as such:

'St Catherines Retail Park is in need of refurbishment. The Council recognises that demand currently exists from retailers wishing to locate in Perth City Centre and as such have agreed to an extension of the range of goods which can be sold from the Park and this has been linked to the redevelopment and improvement of the Park. The Retail Park forms a logical extension to the town centre and compliments the existing retail provision by offering large accessible units for new retailers coming to Perth who cannot be accommodated within the existing city centre boundary.'

3.3 POLICY RC3: COMMERCIAL CENTRES

Proposed Policy RC 3 states that:

'Proposals for retail units will be promoted in the commercial centres shown on the proposals map. However certain uses will be restricted in some of the commercial centres based upon their planning consents and legal agreements for planning obligations. The Council supports improvements to the commercial centres including increased floor space provided parking provision and landscaping is not compromised'.

Our clients **object** to the second sentence of policy RC3, and consider it should be removed. If the role of each of the commercial centres is defined then this sentence is unnecessary and simply would retain an unwelcome 'one size fits all' approach to restrictions on development within commercial centres.

A further sentence should be included which states:

'Proposals which support the future role of the commercial centres as outlined in this plan will be supported.'

3.4 POLICY RC4: RETAIL AND COMMERCIAL LEISURE PROPOSALS

Proposed policy RC 4 refers to Retail and Commercial Leisure Proposals. It states that *'proposals for any retail and leisure development of 1,500 sq metres or more gross floor space outwith a defined town centre boundary and not in accordance*

with the development plan will require a transport, retail or leisure impact assessment.'

Our clients **object** to the wording of this element of the policy. To request a retail impact assessment for proposals of 1,500 sq m is contrary to Scottish Planning Policy. The SPP outlines the threshold of 2,500 sq m as requiring a retail impact assessment and the proposed plan offers no explanation as to why it should depart from National Policy.

The words '1,500 sq m' should be replaced by '2,500 sq m' to reflect Scottish Planning Policy.

4 CONCLUSIONS

There are key points our clients have raised regarding the Proposed Plan. We believe it has departed significantly from statements included in the Main Issues Report at paragraph 4.3.29.

Our clients are looking to make a significant financial investment in the environment of the retail park and are looking to bring investment into the Perth area. Our clients hope that this intention to invest in Perth is recognised by Perth and Kinross Council in the development of the Local Development Plan. For this investment to take place there is currently a financial viability issue if the centre is not given the ability to attract those larger space retailers who are currently unrepresented in the City. Flexibility in the retail offer is an essential part of the centres regeneration potential.

We believe that there are several matters within the Retail section of the plan that should be altered/removed and we have made our representations in this document accordingly.

In summary we suggest that the following changes be made to the plan:

- The City Centre Secondary uses boundary should be altered to include St Catherines Retail Park (South)
- A statement on the future role of the Retail Park should be included in the plan as outlined in paragraph 3.2 above.
- Policies RC 3 and RC 4 should be amended.

These objections can easily be overcome by making the necessary minor amendments to the proposed plan.

Should you have any questions relating to the issues raised in this document please do not hesitate to contact the author.

This representation was submitted with supporting documents, due to size these are unavailable on the website, but are available to view at Pullar House, 35 Kinnoull Street, Perth, PH1 5GD.

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The period of representation will end at **4pm on Tuesday 10th April 2012** and it is essential that you ensure that representations are with us by then.

Your representation will be considered as part of the Local Development Plan preparation process and will be processed by employees of Perth & Kinross Council's Environment Service. Representations and any information you provide (except signatures, email addresses and phone numbers) will be available for public inspection, published online and may be shared with other appropriate professionals and service providers. Under the terms of the Data Protection Act 1998 you are entitled to know what personal information Perth and Kinross Council holds about you, on payment of a fee of £10.

Once we have your representation(s) we will acknowledge them and inform you when the Proposed Plan has been submitted to Scottish Ministers for examination. Scottish Government guidance indicates that representations should be a maximum of 2000 words to provide the Examination Reporter with concise representations that can be resolved through written representations, hearings or a public inquiry as part of the examination process.

1. Contact details (only representations that include full contact details are valid)

Name	Andrew McNab MRTPI MRICS
Address and Postcode	Colliers International 39 George Street Edinburgh EH2 2HN
Telephone no.	[REDACTED]
Email address	[REDACTED]

Note: email is our preferred method for contacting you – if you do not wish to receive correspondence by email, please tick this box: ☐

2. Which document are you making a representation on?

Proposed Plan	<input checked="" type="checkbox"/>	SEA Environmental Report – Addendum 2	<input type="checkbox"/>
Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

If making a representation on Supplementary Guidance, please state the name of the document:

3. Which part of the document are you making a representation on?

Policy ref.	<input type="text" value="Policy RC 3 Commerical Centre"/>	or
Site ref.	<input type="text" value="Land at Crieff Road, Perth"/>	or
Chapter	<input type="text"/>	Page no. <input type="text"/> Paragraph no. <input type="text"/>

Perth and Kinross Local Development Plan – Proposed Plan **Representation Form****4. What is your representation?**Are you supporting the Plan? ☒**Or**

Would you like to see a change to the Plan? Please state this change.

Our clients, ABP Ltd, support the proposed allocation of Land at Crieff Road (the site of their existing meat packaging facility) for retail purposes within the proposed Commercial Centre.

Please include the reason for supporting the Plan/requesting a change.

This represents the most appropriate long term land use for the site.

The Submit button will open an email addressed to the LDP team and attach this form, at this point you will have the opportunity to add text to the email and attach any supporting information.

To submit your form you then have to send the email.

Save a copy**Print****Submit**