

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

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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	Crieff Hydro Ltd c/o Halcrow (A CH2M Hill Company) fao Stefano Smith
Address and Postcode	Halcrow (A CH2M Hill Company) 16 Abercromby Place Edinburgh EH3 6LB
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.	ED3: Rural Business & Diversification	or			
Site ref.		or			
Chapter		Page no.		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.

See attached

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

See attached

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Proposed Plan

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Policy ref. ED3: Rural Business & Diversification

4. What is your representation?

Reason for Change to the Plan

Crieff Hydro Ltd supports the Council's recognition that rural businesses are equally important drivers of sustainable economic growth in the region. Maintaining and improving their competitiveness is vital to the local economy. Crieff Hydro Ltd welcomes the Council's recognition that some rural locations are appropriate for tourism and rural based businesses. Importantly, Crieff Hydro Ltd strongly supports the Council's commitment to supporting tourism-related developments and facilities, in recognition that tourism is a key economic driver in the region accounting for 13% of all employment in Perth and Kinross. Tourism is one of the region's largest sectors and is an important economic driver; therefore, tourism should form part of the Council's economic development policy.

However, in this context Crieff Hydro Ltd seeks the strengthening of Policy ED3 in terms of its support not only for '*new tourism related development*', but also to existing tourism related developments, particularly where it can be demonstrated that diversification of the business will improve the quality of visitor facilities and allows a new market to be exploited or the tourism season extended.

Recommended Change

Modify the Proposed Plan Policy ED3: Rural Business and Diversification as follows:

'New **[ADD and existing]** tourism related development will be supported where it can be demonstrated that it improves the quality of new or existing visitor facilities, allows a market to be exploited or extends the tourism season.'

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Policy ref. ED5: Major Tourism Resorts

4. What is your representation?

Reason for Change to the Plan

Crieff Hydro Ltd welcomes the specific policy in the Proposed Plan to support explicit key tourist destination resorts, including Crieff Hydro. This is in clear recognition that tourism is a key economic driver to sustainable economic growth, as recognised in national, strategic and local policy guidance. In addition, the Proposed Plan explicitly recognises the key major tourism resorts within the region that contribute significantly to the tourism economy, which includes Crieff Hydro.

Scotland has a longstanding and robust tourism sector. This offers UK and overseas visitors a high quality and diverse experience and is inextricably linked to Scotland's outstanding cultural and natural heritage. The Scottish Government issued the Scottish Economic Recovery Plan: Accelerating Recovery in March 2010 in response to the challenges facing Scotland's economy in a global economic recession. This recognises the comparable strength of the tourism industry in Scotland, supported by changes to foreign exchange rates that have made the UK an attractive destination for foreign visitors and has fuelled the 'staycation' effect to encourage domestic UK visitors to Scotland. The resilience of the Scottish tourism industry in general, and the investment in policy and economic development at the national level provide a clear economic driver for supporting successful local tourism products.

It is important that the policy framework contained in the Proposed Plan allows for the vision and aspirations of the Crieff Hydro estate, as a major tourism and economic driver in the area, to become a reality. It is acknowledged that the landscape setting of the major tourism resorts, such as at Crieff Hydro, is a factor which is integral to the tourism offer. However, the quality of the landscape setting of such resorts, such as at Crieff Hydro, does vary across the estate, which allows for the opportunity for the continued expansion and growth of the estate where the landscape capacity allows.

In the context of the above, we seek a minor modification to Policy ED5 which acknowledges and responds to the variation in the quality of landscape setting, and the ability of the landscape to absorb development in appropriate locations.

Recommended Change

Modify Policy ED5: Major Tourism Resorts as follows:

‘The Plan area includes a number of significant resort complexes which play a significant role in the local, national and international tourism economy. The improvement or expansion of these facilities will be encouraged, and the landscape setting which is integral to their tourism offer will be protected from developments, [**DELETE** with and **ADD** *where there is*] the potential to adversely impact upon it. Specifically these major resorts are:

- a) Crieff Hydro
- b) Dunkeld House
- c) The Gleneagles Hotel
- d) gWest
- e) Taymouth Castle Estate

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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.	ED4 - Caravan Sites, Chalets and Timeshare Developments	or			
Site ref.		or			
Chapter		Page no.	2	Paragraph no.	

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Telephone [REDACTED]
Email [REDACTED]

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Proposed Plan

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

Policy ref. ED4 - Caravan Sites, Chalets and Timeshare Developments

4. What is your representation?

Reason for Change to the Plan

Crieff Hydro Ltd supports the principle of a specific policy for tourist accommodation. As the Council is committed to supporting proposals for increasing tourism development in the region, then commensurately there will need to be places for tourists to stay.

Tourist accommodation can comprise of a mixed range and type of accommodation including, caravan sites, chalets, camping sites, timeshare developments, hotels, hostels, guesthouses, holiday homes and fractional ownership. The ever-changing tourism accommodation market is also identifying new types of accommodation and environments that are becoming increasingly popular, such as various forms of 'cool camping' including yurts and bubble hotels.

In this context, Crieff Hydro Ltd does not see the need or benefit of having a tourist accommodation policy as currently drafted in the Proposed Plan for explicit forms of tourist accommodation, that is, caravan sites, chalets and timeshare developments. Policy ED4 is considered to be overly complex, restrictive and not user-friendly. In the context of the timescale for the Local Development Plan (LDP), policies should not become constrained or outdated by explicit reference to, for example, explicit types of tourist accommodation, that may change over time. The policies should be sufficiently flexible and responsive to the various forms of tourist accommodation that may emerge during the Plan period.

Recommended Change

Modify Policy ED4: Caravan Sites, Chalets and Timeshare Developments as follows:

'Policy ED4: **[DELETE]** Caravan Sites, Chalets and Timeshare Developments and **ADD** *Tourist Accommodation*]

[DELETE] Policy ED4A: Existing Caravan Sites]

Encouragement will be given to the retention and improvement of existing **[DELETE]** caravan and camping sites and **ADD** *tourist accommodation*] provided the improvements are compatible with adjoining land uses and the site makes a positive contribution to the local economy.

[DELETE] Policy ED4B: New or Expanded Transit and Touring Caravan and Camping Sites]
Proposals for new or expanded **[DELETE]** transit and touring caravan and camping sites and

ADD tourist accommodation] will be supported where proposals are compatible with Policy PM1 [**ADD Placemaking**].

[**DELETE** Policy ED4C: Chalets, Timeshare and Fractional Ownership] The Council will give favourable consideration to new [**DELETE** chalet and timeshare/fractional ownership developments and **ADD tourist developments**] where it is clear these cannot be used as permanent residences. Such developments [**DELETE** must and **ADD will**] also:

- a) involve the expansion of [**DELETE** an existing hotel, guest house, chalet park, caravan park or timeshare or fractional ownership development and **ADD tourist development**] where the development does not constitute over-development of the site or its setting; or
- b) replace static caravans with more permanent structures; or
- c) meet a specific need by virtue of its quality or location in relation to tourism facilities.

[**DELETE** In all cases]

In the event of land ceasing to be used as [**DELETE** a caravan and camping, chalet or timeshare or fractional ownership development site and **ADD tourist accommodation**] there shall be no presumption in favour of permanent residential development.

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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="8"/>	Page no.	<input type="text" value="249"/>	Paragraph no.	<input type="text" value="8.3.2"/>

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Proposed Plan

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

Chapter 8 p.249 para.8.3.2

4. What is your representation?

Reason for Change to the Plan

Crieff Hydro Ltd supports the identification of tourism as a spatial strategy consideration in Crieff. Tourism is clearly a key economic driver to sustainable economic growth, which is recognised within national, strategic and local policy guidance. Crieff Hydro Hotel makes a significant contribution to the regional and local economies in terms of both direct and indirect inward investment and employment. It is therefore appropriate for tourism, and specifically Crieff Hydro, to be identified as key drivers to shaping the spatial strategy considerations within Crieff.

However, Crieff Hydro Hotel's significant contribution to the tourism economy is not only in terms of providing for visitor accommodation as inferred by the current wording within the Proposed Plan,

'...The Crieff Hydro Hotel, and the caravan site to the west of the town, are specifically identified for their contribution to the provision of visitor accommodation and should be retained for their current uses' (Chapter 8 Section 8.3 para.8.3.2 p.249)

Crieff Hydro Hotel offers a wider leisure and tourism experience than simply 'visitor accommodation'. Crieff Hydro Hotel has had to diversify, and be responsive to, the tourism and leisure market in order to maintain its competitive advantage and continue to be a significant investor and employer within the region. Crieff Hydro is continually investing within its business, for example, conference and dining facilities, chalets, leisure, retail, as well as within the hotel.

The Plan should recognise the importance of the tourism development at Crieff Hydro, and seek to both protect its status and provide a sufficiently flexible framework to enable it to be responsive to the changing needs and trends within the tourism and leisure market.

Recommended Change

Modify the Proposed Plan Chapter 8 p.249 para.8.3.2 by amending the third paragraph to read as follows:

'Tourism provides employment and brings visitors to the town. This improves the vitality and viability of Crieff and ensures the services and facilities can continue to be provided in the

area. The Plan therefore seeks to promote and enhance existing and future tourist development in the area. The Crieff Hydro Hotel, and the caravan site to the west of the town, are specifically identified for their contribution to the provision of visitor accommodation, [**ADD with the Crieff Hydro Hotel additionally providing a wider and more extensive range of holiday accommodation, tourism and leisure facilities]; they should therefore be [**DELETE** retained] [**ADD protected and enhanced.**] [**DELETE** for their current uses].**

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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.	RD6: Particular Needs Housing Accommodation	or			
Site ref.		or			
Chapter		Page no.		Paragraph no.	

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2. Which document are you making a representation on?

Proposed Plan

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

Policy ref. RD6: Particular Needs Housing Accommodation

4. What is your representation?

Reason for Change to the Plan

Crieff Hydro Ltd welcomes the inclusion of a specific policy in the Proposed Plan in recognition of the need of accommodation for particular needs, which is essentially accommodation for an ageing population.

As the demography of the Council area continues to change with the population bulge of the baby-boomer generation reaching retirement, the housing needs of the wider population are diversifying. The Housing Need and Demand Assessment identifies that the Perth and Kinross population is ageing to a greater degree than that of the rest of Scotland. There is a shift in the age profile with an anticipated increase in the number of people of retirement age by 2021.

With an increase in the older population there is the opportunity for the private sector to cater for this wide and significant sector of the housing market. Developing a true mix of types of accommodation will assist the ability of the older population to live longer in their community. Residential accommodation tuned to the priorities of the older population can draw those who are thinking forward to downsize and take advantage of homes that can more readily accommodate future needs.

Where a higher level of assistance is sought by individuals the solutions may involve the development of 'supported communities' with facilities aimed at providing a sliding scale of care as and when needed. Development of 'supported communities' should facilitate integration with the wider community. To this end, sites for such development should be within easy walking distance of local services and facilities. Such services and facilities can be provided within new developments.

There will be a role for dedicated care homes for people with the need for a greater level of assistance that can no longer be catered for within the home environment. Proposals for the provision of new care homes will be carefully assessed and developed in consultation with the Care Commission and the Council's Social Work Service and NHS. Proposals for new care home facilities should be of a scale that is appropriate to meet local needs.

In this context, we seek a modification to Policy RD6 which acknowledges and responds to the accommodation needs of an ageing population. Suitable sites need not be confined to

existing residential areas; there may be other suitably located sites close to amenities and services within environments which already provide accommodation in safe, comfortable, caring and secure surroundings.

Recommended Change

Modify Policy RD6: Particular Needs Housing Accommodation as follows:

‘Policy RD6: **[DELETE]** Particular Needs Housing Accommodation and **ADD** *Accommodation for an Ageing Population*’

The Council will support proposals for **[DELETE]** particular needs housing and accommodation and **ADD** *accommodation for an ageing population* **[DELETE]** which fall into one of the following categories:

- a) residential developments supporting housing for particular needs] such as housing for the frail, elderly or special needs, and housing for varying needs **[DELETE]** must and **ADD** *should* be suitably located for both residents and visitors, providing high quality care and minimal impact on the environment; and should be located in **[DELETE]** residential] areas where residents have access to local services and facilities and are integrated within the **[DELETE]** local] community.

[DELETE] b) Houses in Multiple Occupation (HMOs); this should be a separate and distinct policy]

[DELETE] In all cases] Development **[DELETE]** must and **ADD** *should* be compatible with the **[DELETE]** residential] nature of the area.

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Chapter	<div style="border: 1px solid black; width: 100px; text-align: center;">8</div>	Page no.	<div style="border: 1px solid black; width: 100px; text-align: center;">241</div>	Paragraph no.	<div style="border: 1px solid black; width: 150px; text-align: center;">8.1.17</div>

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Proposed Plan

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Chapter 8 p.241 para.8.1.17

4. What is your representation?

Reason for Change to the Plan

Crieff Hydro Ltd supports the identification of tourism as a market sector to be explicitly considered within the Strathearn Area, and specifically the recognition of,
'Crieff... as an 'important tourism centre(s), attracting visitors to the area, providing accommodation and offering employment opportunities.' (Proposed Plan Chapter 8 para.8.1.17 p.241)

Crieff Hydro also supports the specific identification of Crieff Hydro as an important tourism development within the Plan.

However, in recognition of the importance of tourism as a key economic driver within the local and regional economies, and the explicit identification of Crieff Hydro as one of three important tourism developments within the Strathearn Area, we consider that the wording in paragraph 8.1.17 should be strengthened to demonstrate the Council's support and commitment to facilitating and enabling the continued growth and expansion of these important tourism developments.

Recommended Change

Modify the Proposed Plan Chapter 8 p.241 para.8.1.17 by amending the paragraph to read as follows:

'Crieff and Gleneagles are important tourism centres, attracting visitors to the area, providing accommodation and offering employment opportunities. The Plan recognises the importance of three tourism developments at Crieff Hydro, Gleneagles Hotel and gWest, and [DELETE seeks to protect and enhance them] [ADD will protect and support the enhancement of these important tourism developments.]

Local Development Plan Team
Perth and Kinross Council

East Lodge, Barnhill,
PERTH PH2 7AT
11/3/12

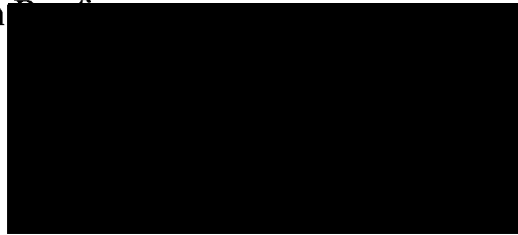
RECEIVED
13 MAR 2012

Draft Greenbelt Proposals.

I would like to congratulate the Local Development Plan Team on the proposals for the protection of the landscape setting of Perth.

If the policy is implemented by the Council long term landscape conservation is assured.

Norman



Your Details

An asterisk (*) indicates a required field.

Your Name: *	<input type="text" value="Persephone Beer"/>
Organisation Name:	<input type="text"/>
Agent Name:	<input type="text"/>
Address 1: *	<input type="text" value="60 Oakbank Crescent"/>
Address 2	<input type="text" value="Perth"/>
Address 3	<input type="text"/>
Postcode: *	<input type="text" value="PH1 1DF"/>
Phone Number:	<input type="text"/>
Email Address: *	<input type="text" value="REDACTED"/>
Site Name:	<input type="text"/>
Contact Person:	<input checked="" type="checkbox"/> Me <input type="checkbox"/> My Agent

Your comments will be applied to the following items:

5 Perth Area Spatial Strategy - 5.2 Perth - Paragraph 5.2.5

Would like to see appropriate funding allocated for cycling and walking projects, in particular key pieces of infrastructure such as a pedestrian/cycle bridge over the Tay to Quarrymill and White Bridge over the Lade. Although such projects are costly this has to be balanced against the much greater costs of road infrastructure improvements. All new road schemes proposed should have dedicated cycling and pedestrian facilities.

Cross Tay Link Road must have dedicated cycle/pedestrian facilities

5 Perth Area Spatial Strategy - 5.2 Perth - Paragraph 5.2.6

New development should be designed and located so as walking and cycling is the travel mode of choice for anyone living/using those areas.

New park and ride sites must have facilities for cycling parking and dedicated paths to link them to the city centre.

5 Perth Area Spatial Strategy - 5.2 Perth - Paragraph 5.2.7

Support path networks in this area, those existing and would request that new ones are developed as part of any development proposals.

5 Perth Area Spatial Strategy - 5.2 Perth - Paragraph 5.2.9

Would support contributions towards new White Bridge. Work on finding funding for this should commence immediately.

5 Perth Area Spatial Strategy - 5.2 Perth - Paragraph 5.2.11

Access for cyclists and pedestrians should be ensured here. Links exist to the riverside path and Dunkeld road that should not be lost and need to be incorporated into any development brief, site plan etc Inveralmond Roundabout should be made more cycle friendly with better access to both sides of Dunkeld Road. Toucan crossing required on roundabout and on north side of Dunkeld Road.

5 Perth Area Spatial Strategy - 5.2 Perth - Paragraph 5.2.13

Safeguard cycle and pedestrian access to this site to the Riverside Path, North Muirton Commuter route and Dunkeld Road, including "the Triangle"

5 Perth Area Spatial Strategy - 5.2 Perth - Paragraph 5.2.22

Development design should retain through routes for pedestrians and cyclists including links to Lade Path

5 Perth Area Spatial Strategy - 5.33 Scone - Paragraph 5.33.3

Infrastructure should include new pedestrian/cycle bridge over the Tay to provide off-road route from Scone to Perth, Inveralmond etc Cross Tay link road should include cycle and pedestrian facilities and routes to it.

5 Perth Area Spatial Strategy - 5.33 Scone - Paragraph 5.33.4

Provide cycle and pedestrian route to Perth as well as to village centre.

11 Appendix 1: List of Supplementary Guidance - 11.1 Supplementary Guidance to be consulted on at the same time as the Proposed Plan - Paragraph 11.1.2

Supplementary guidance should be provided to highlight requirements for cyclists, particularly cycle parking as part of new developments.

Your Details

An asterisk (*) indicates a required field.

Your Name: *	<input type="text" value="Robert Burke"/>
Organisation Name:	<input type="text"/>
Agent Name:	<input type="text"/>
Address 1: *	<input type="text" value="Redinche"/>
Address 2	<input type="text" value="Bellwood Park"/>
Address 3	<input type="text" value="Redinche"/>
Postcode: *	<input type="text" value="PH2 7AJ"/>
Phone Number:	<input type="text" value=""/>
Email Address: *	<input type="text" value=""/>
Site Name:	<input type="text"/>
Contact Person:	<input checked="" type="checkbox"/> Me <input type="checkbox"/> My Agent

Your comments will be applied to the following items:

5 Perth Area Spatial Strategy - 5.2 Perth - Paragraph 5.2.2

I strongly support the concept of a Green Belt for Perth, and especially the proposed area to the east of the city. Tay Street and the surrounding area are important for tourists, and the Green Belt designation protects the attractive view from here.

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.

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 Charles Woodhead
Address and Postcode 4 Corsiehill House, Corsiehill, Perth
PH2 7BN

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. Greenbelt or

Site ref. or

Chapter Page no. 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.

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

I fully support the draft plan with regard to the proposed greenbelt around Perth.

In particular I support the inclusion of Corsie village & the surrounding fields (including the monastery field) in the green belt.

Corsiehill hamlet is wholly situated within the natural boundary of the Kinnoull Woodland Park which is one of Perth's best natural features. It is right that this entry point to the park benefits from the protection a greenbelt designation gives.

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

'Neidpath'
Whitelea Road
Burrelton
Blairgowrie
Perthshire.
PH13 9NY

Ms Brenda E Murray
Team Leader – Development Plans
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

3rd April, 2012.

Dear Ms Murray

PROPOSED LOCAL DEVELOPMENT PLAN

I refer to the above most recently produced plan for the development of all aspects of community and commercial life in the Perth and Kinross Council Area and would comment as follows having previously commented on earlier editions of similar Plans and where initial observations identify that little or no consideration has been given to previous responses, not only those that have been expressed by myself, but many that have been either verbally or written by others.

With regard to the foregoing I would refer you to my previous responses concerning the

Perth Local Plan 2005 (copy attached)

New Development Plan for Perth & Kinross (copy attached)

Development Bid for inclusion in Main issues Report – Land at Burrelton (copy attached)

It is interesting to note that stated **Key Objectives** at Section 2.3 include the need for the 'location of new developments contributes to reducing the need to travel', 'ensure the new development enhances the environment' and 'does not 'exceed the capacity of the landscape in which it lies'.

At **Policies** in Section 3.5.2 it is expressed that 'there is a need to protect and enhance environmental and landscape quality and ensuring that inappropriate development does not compromise what makes Perth and Kinross such an attractive place to live, work and visit'. Section 3.5.5 refers to general encouragement for proposals that

- a) infill residential development of a similar density to its environs.
- b) proposals which will improve the character and environment of the area or village.

At **Transport and Access** Section 3.6.2 reference is made to the need to shift to more sustainable modes of transport to help meet Government greenhouse gas emission targets and that planning authorities should support developments that reduce the need to travel.

For obvious reasons the focus of this response is my personal observations on the impact that the proposed plan will have on the village and its environment. By

necessity this will also impinge on the wider plans for the entire area lying to the east of the River Tay and where a road crossing of the River Tay to the north of Perth, forms an integral part of the Plan and where, in relative terms, significant investment and by implication borrowings, will be required to completely replace or modernise or simply improve the present infra-structure.

The foregoing, of course, has a direct effect on our ability, not just as a Council but as a Nation, to firstly borrow and then more importantly repay the borrowings. That we live in seriously depleted financial times is only too apparent and where that continues to manifest itself in all walks of present day life. The financial straits that Greece finds itself in continue and now more recently Spain and where ever increasing burdens of borrowing and repayment constraints are being placed on these nations which, unfortunately, has a spill over effect on us here in the UK, Scotland and ultimately us living here in Perth and Kinross.

The economic problems facing the Greeks and Spanish are not unique to them, but are closely followed by those affecting only to a slightly lesser extent, those of Italy and Portugal to name but a few. By comparison we are a small country with just over 5.5 million of a population and where, in the next 2 years or so, our whole political landscape may change, if not for ever, certainly for the foreseeable future. What chances then for the projected investment figures for the necessary land purchases associated with the proposed new bridge and link roads over the River Tay and thence to the A.93 Perth to Blairgowrie Road and A.94 Perth to Forfar Road all against a recently quoted Audit Scotland backdrop of an annual 10 billion pound deficit in the finances of Scotland, should we become an independent Nation.

With regard to the foregoing, I understand from a recent meeting and conversation at Coupar Angus town hall that once the 'finances' are in place the 'bridge' project will go ahead. An interim measure for those living on the eastern side of the Tay appears to be a ban on large building projects until the bridge is completed, however, if I understand it correctly, partial building projects will be allowed to commence, based on the progress of the new bridge and road infrastructure.

The foregoing all sounds like a fair smattering of the 'cart before the horse' approach and where, should the finance for the bridge and road infrastructure dry up or be diverted to fund more urgent National needs part way through the project we, on the eastern side of the Tay, would be left in an even worse state than we are already in with regard to associated traffic and environmental issues in Perth and Bridgend in particular.

Equally, should it come to pass that the bridge is completed along with the necessary links to the A.93 and A.94 roads it is a matter of considerable concern what the implications will be for traffic flows on the A.94 route in particular. As a resident of Burrelton for the past 24 years or thereby, it is clear that traffic flows on this north to south corridor continue to increase. There is little doubt that should the bridge project be completed that a significant percentage of the north/southbound traffic flows that currently use the A.90 Dundee route will divert to using the A.94. The foregoing is a matter of pure common sense based on the reduced mileage and corresponding fuel savings for all concerned.

The downside to the foregoing is, of course, the increased volume of traffic passing through Balbeggie, Burrelton/Woodside, Coupar Angus and Meigle to destinations well beyond these local communities, a problem which will not be particularly noticeable on the A.93 route to and from Blairgowrie, as that is basically the only logical destination on that route apart from say Alyth. I am aware that there is a

suggestion that the Kingsway in Dundee may be completely redeveloped, which would perhaps ease the expressed concerns. However, for the financial reasons already referred to, such development is considered doubtful in the extreme and even in a favourable environment would be 'light years' away, and where one only needs to consider the experiences and problems encountered in Aberdeen in their attempts to by-pass Anderson Drive.

In previous responses I have stressed that I am not vehemently opposed to housing development within the combined villages of Woodside and Burrelton and in this regard one has to be realistic. However, in this regard, one would expect planning authorities to be equally realistic and sympathetic to the impact on local communities by proposed developments. In this regard I find it astonishing that in the space of a few years, the proposed development for H.16 lying to the north of Whitelea Road, has progressed from 15 low density houses, subsequently increased to 70 and now to the quite unacceptable figure of 100 houses.

Such a development rides rough-shod through the stated reassurances contained within the Key Objectives, Policies and the Transport and Access sections of the Proposed Local Development Plan. Such a 'dump' of houses in Burrelton, which would increase the housing stock by some 60%, is hardly commensurate with the stated Key Objectives of reducing the need to travel, enhancing the environment and not exceeding the landscape in which it lies.

With regard to the foregoing it will be appreciated that the village facilities consist of a small post office and a butcher shop. The car dealership and garage has been sold and is relocating to Perth early in 2013, therefore, in a nutshell, there is basically no source of employment within the village and little or no likelihood of that in the future. Should such a 'dump' of houses become reality, those seeking employment will have to travel and realistically speaking that will, by necessity, be by car.

Equally such a development hardly fits with the expressed desires of an infilling residential development of a similar density to its environs, where no apparent consideration has been given to the existing shape of the village and the effect that this will have on the character and environment of the area or village and by no consideration could it be classified as an improvement.

The completely inadequate primary school facilities have been previously identified, as has the location and inadequate access routes to the school. It would appear that the proposal is for a completely new access road to be built to the south of the village and which is routed across a field to the west of the A.94 and curving to join Whitelea Road west from the existing village boundary on that road. The proposed road would then pass through the new development to access the school. Again these proposals do not lie easy with the content of the Key Objectives, Policies and Transport and Access as contained within the Proposed Local Development Plan.

In my previous letter of 10th December, 2010, concerning the New Development Plan for Perth and Kinross, I referred to the parcel of land to the west of Manse Road/The Beeches, Woodside, which is rightly described as a discreet site. It is below the general level of the village, screened by many mature trees and would have little visual impact on the few adjacent properties. Equally, it is conveniently much closer to the sewerage works at the northern eastern extremity of Woodside and where access from and to the A.94 Perth to Forfar Road would, on the face of it, be a simpler and less costly road improvement exercise.

Equally, it would have the effect of 'rounding off' the village on the western side and would presumably obviate the need for the large and visually impacting southern extensions to the village. Indeed, this latter comment may equally apply to the need to develop all the other identified patchwork sites in the two villages. It may also provide an ideal site for a new school as distinct to a hotchpotch extension to the already identified and completely inadequate facility and could also provide a useful hall facility for the local community as a direct alternative for the present and sadly outdated hall.

Furthermore, being adjacent to the local football pitch, it would potentially offer sporting facilities that are sadly lacking at the present school and site and as previously identified it has many commendable features. In that regard it is not considered unreasonable to suggest that it should be considered as the prime site for development, in the unlikely event that such building needs arise in the future given the substantial and continuing downturn in the housing market.

Yours sincerely

Submitted by John and Margaret Alexander.

Perth Local Plan 2005

This submission considers the impact that the proposed increase in housing in the village of Burrelton and Woodside will have on the community.

Policy 33 clearly states that general encouragement will be given to

- Infill residential development, but only where this **will not** adversely affect the density, character or amenity of the village.
- Proposals which will improve the character and environment of the village.

Comment

Burrelton and Woodside are small communities with very localised and narrow roads serving the houses on the outskirts of the villages. The only road of any significance is the A.94 Perth to Forfar road, which dissects the villages from north to south. Although not subject of a breakdown of use, the perception is one of the aforementioned road carrying an ever-increasing volume of commercial and private traffic.

The Plan identifies 100 additional houses for Burrelton (70 in School Road – with a previous plan identifying 15 houses on this site and 30 in Main Road) with 27 houses allocated to two sites in Woodside. Concentrating on Burrelton with 100 proposed houses, the generation of additional traffic will be at the very least significant, to the point of being downright invasive.

The exact number of houses in Burrelton is unknown, however, it is estimated to be about 180 or thereby. Obviously with such a proposed increase in housing, this will have a dramatic effect on the **density, character and amenity of the village**, which is completely contradictory to the objectives of Policy 33 as stated above.

Housing

At 7.1 the housing needs to 2020 are detailed with sites within and close to Perth being preferred, with some small-scale opportunities in villages and surrounding rural area. Representing a **55% increase** in housing **within Burrelton** that simply cannot fall within the definition of '**small scale opportunity**'.

At 7.11 the affordable housing Need/Supply is identified. The Section detailing Rural North East being 7% of the total is 30, with that figure being accommodated within Burrelton at two sites (School Road and Main Road). By any consideration the foregoing cannot be reasonable or considerate to the existing villagers.

In this regard it is worth pointing out that most of the houses in the village and particularly those that abut the proposed School Road development, are located on large plots with this being a feature of the village. Similarly, the majority of houses are either single storey or storey and a half. With such density of housing as proposed, 70 on probably 7 acres of ground once deductions are made for access roads, utilities etc., are likely to be two storey with such design and density completely out-with the existing village environment.

At 7.15 Low Cost Housing needs are identified. The School Road site is identified as supporting 20 affordable houses and 15 low cost houses. The Site has unrivalled north westerly views to Blairgowrie, Glenshee and the Angus hills, lending itself to the provision of low density quality dwellings (as contained in the previous plan), as distinct to what would inevitably be high density housing, again being completely out-with the character of the village.

At 7.22 Housing Density is discussed with a median figure used to calculate the contribution to housing land supply. The density apportioned to Burrelton would seem to be inconsiderately high and certainly is not well received by the public i.e. the villagers.

Policies Applicable to the Entire Local Plan Area

Policy 50 States that all developments will be judged against the following criteria

- They should have a landscape framework capable of absorbing or screening the development...
- In the case of built development, regard should be had to the scale, form, colour and density of existing development within the locality.
- The development should be compatible with its surroundings in land use terms and should not result in a significant loss of amenity to the local community.
- The local road, path and public transport network should be capable of absorbing the additional traffic generated by the development and a satisfactory access onto that network must be provided.
- Where applicable, there should be sufficient spare capacity in drainage, water and education services to cater for the new development.

The first item indicated above is incapable of comment at the moment. However, all four of the remaining criteria would appear to have been conveniently set aside for the proposed School Road development.

By no stretch of the imagination can the proposal for 70 houses comprising of 20 affordable and 15 low cost be considerate of the scale and density of those currently existing. It would not be compatible with the surroundings and would certainly result in loss of amenity to the local population.

The local road and path factors are discussed later in this submission.

Village Boundaries

It is noted with interest that a peculiar extension to the village boundary is identified on Map 15. This is located on Whitelea Road on the western extremity of the village and on the south eastern side of the road. The foregoing would appear to involve somewhere in the region of a 70.00 metre extension to the village boundary and has no apparent logic as it stands at the moment. A more logical approach would be a straight line south eastwards from the present boundary to a small burn that acts as a defining line for the houses presently on the southeast side of Whitelea Road.

There is nothing identified in the plan regarding this small packet of land, what its intended use would be, and its inclusion is a complete puzzle at this stage. If there is an underlying reason for this apparent extension to the village boundary, then that should be made clear at this stage and not simply included for possible debate or discussion later.

ACCESS ROADS TO SCHOOL ROAD

Turning now to the local road and path network the following photographs identify the three possible routes to achieve access to North Street, Burrelton, which then allows access to School Road and Site Reference VH 17.

Listed Developer Requirements include

- Drainage Improvements
- School Improvements
- Enhance core path network at the end of School Road.

It would appear that no consideration has been given to how safe and proper access to and from School Road will be achieved and, more importantly, passed the Primary School, which immediately abuts the present sub-standard road. In this regard the photographs commence with the

Whitelea Road Access

Photograph A : is a view looking eastwards in Whitelea Road towards its junction with High Street, which occurs about 50.00 metres inside the village boundary. The access to the proposed V 5 site is within the bellmouth of the junction and located just beyond the electric pole seen at the end of the beech hedge.

The present access road at its entrance/exit onto Whitelea Road is considered completely inadequate, particularly for traffic entering the junction from the south and the potential for conflict with emerging traffic from the proposed Site.

Photograph B : is a view looking westwards in Whitelea Road with the North Street junction off to the right. The house located on the junction creates a significant obstruction to easterly visibility when attempting to exit from North Street.

Photograph C : is a view looking northwards along North Street from its junction with Whitelea Road.

School Road Access From High Street

- Photograph A :** is a view looking westwards in School Road from its junction with High Street. A single pavement is provided on the southern side which is 1.30 metres wide. The road is of variable width but averages about 4.20 metres.
- Photograph B :** is a view looking northwards along High Street at its junction with School Road. The northern extremity of a Bus Stop can just be seen on the right extremity of the photograph.
- Photograph C :** is a view looking southwards in High Street at its junction with School Road. There is a Bus Stop located on the eastern side of the road and just beyond the southern extremity of the junction. A Bus Stop is located on the western side of High Street, which is located at the telephone box.
- Photograph D :** is a view looking westwards in School Road at its junction with North Street. School Road continues beyond the junction and curves around to the left.
- Photograph E :** is a reverse view of the previous photograph and is looking towards the High Street junction in the far distance. The narrowness of the street is abundantly clear.
- Photograph F :** is a view looking southwards in North Street with the junction on the left being that section of School Road that leads to High Street. The parked motor cars highlight how congested the street can become and its unsuitability for the likely traffic generated by the proposed housing.
- Photograph G :** is a view looking into the western leg of School Road from its junction with North Street. The road is 3.95 metres wide and the pavements on either side at the bellmouth are about 1.00 metre wide.
- Photograph H :** is a view looking westwards in School Road with the pavement on the south side of the road now reduced to a completely inadequate width.
- Photograph I :** Is a further view looking westwards in School Road, which identifies the inadequacy of the pavement on the south side of the road. The school entrance is immediately in front of the parked car.

This would be the access road to the proposed Site VH 17 and is considered completely inadequate for a development of 70 houses. Furthermore, and more importantly, there is the safety of children attending school to be considered. The road width is inadequate, the pavement to the south side is inadequate and the access onto North Street is considered inadequate. All this with an inevitable increase in traffic generated from the proposed 70 houses, highlights the potential

danger for children emerging from the school onto the inadequate road and all other pedestrians in the vicinity.

The proposed housing sites and total number of houses within Burrelton and Woodside will generate a significant increase in children attending the Primary School. Similarly, it will generate a considerable increase in vehicular movement to and from the school and surrounding roads, over and above those wishing to gain access to the proposed Site VH 17.

In the event that the proposed development became a reality, the flow of contractors vehicles, plant, deliveries of building materials, excavated material and public utility vehicles, over and above the laying of sewage and drainage connections is of nightmare proportions. This would all be passing the school over a prolonged period of time, probably years, would be fraught with danger for the children and indeed their parents/teachers, given the obvious restrictions of the road.

Of course, the foregoing only applies to the immediate environs of School Road. To gain access to School Road requires such traffic to use North Street with its obvious restrictions and effect on residents. To gain North Street, access has to be gained from Whitelea Road to the south and Scott Street to the north both with their own difficulties. Presumably a 'Nelsons Eye' approach to criteria four listed above has been applied.

The Square/Scott Street Access

- Photograph A :** is a view looking southwards from The Square and into High Street. There is a significant bend in the road at this point, which creates visibility problems for traffic turning right into Scott Street. The housing developments in Woodside and the northern extremities of Burrelton, will inevitably lead to an increase in the flow of traffic to and from School Road and utilising this junction.
- Photograph B :** is a view looking northwards with the Scott Street junction on the left. Note how the right hand bend continues past the junction and downhill gradient, creating potential difficulties for right turning traffic.
- Photograph C :** is a view looking westwards into Scott Street from The Square. Again the narrowness of the street is apparent.
- Photograph D :** is a view looking westwards in Scott Street, which, in fact ends in a burn in the distance. The road off to the left is the northern extremity of North Street.
- Photograph E :** is a view looking into North Street from the western extremity of Scott Street. Again the narrowness of the street is abundantly clear and the potential difficulties created for the inevitable increase in traffic to and from School Road.
- Photograph F :** is a view looking eastwards in Scott Street from its junction with North Street. A full view towards The Square is obtained.

Final Observations

The foregoing has concentrated mainly on the School Road Site VH17, as it, by far, has the greatest density; and will have the greatest environmental and visual impact, being located on the highest point in the village.

There are, however, significant access difficulties to the proposed Main Road development VH 16 via Hall Crescent, which is a narrow street and invariably congested with parked vehicles. Careful consideration will have to be given to access to and from the site. Former local authority housing is located in Hall Crescent, with many now privately owned. Being a much lower site with a degree of natural screening, this would appear to be a more suitable location for any low cost housing.

Similar comment would equally apply to Church Road VH15, with narrow surrounding roads with no pavement provision and a narrow and completely inadequate bridge. An existing exit from Church Road is onto High Street which is located immediately to the south of a significant bend that effectively prevents clear establishment of traffic approaching from the north.

The author of this submission is not against the principle of additional housing within the villages. The concern is that the proposals would swamp the village, its environment and its identity, which has gradually evolved over many years. Clearly a more sympathetic approach to detail within the Local Plan is required.

Whilst this submission has concentrated on the development affecting Burrelton and Woodside, the broader sphere of things must also be considered. In identifying the chronic problems that occur in Bridgend on a daily basis, it is as a regular commuter going elsewhere other than Perth.

It is therefore extremely surprising that the only mention of Bridgend is at 5.13, where reference is made regarding the 'success story' of Perth Airport and its development, not creating peak time pressures on the Perth bridges any worse. The foregoing observations are breathtakingly naïve, in that they appear to completely ignore the daily frustrations of those seeking to gain south or western egress from Perth, but committed to the eternal Bridgend problem.

That the proposed housing plans to the villages and towns to the north east of Perth, namely Alyth 215, Blairgowrie 385, Coupar Angus 105, Scone 262, Balbeggie 59, Guildtown 70, Kinrossie 5, Wolfhill 12 equalling 1,113 houses with the employment of most likely to involve journeys to or through Perth, and inevitably Bridgend, does not auger well for those having to suffer it.

More importantly than that the authors of the Perth Local Plan are simply exacerbating an already unacceptable situation in Bridgend, by producing this housing plan for the aforementioned towns and villages to the north east of Perth. It tends to identify a 'head in the sand' approach, because the complex problem of Bridgend will not remedy itself. By ignoring the problem and producing the planned increases in housing as detailed above, is simply planning for gridlock at Bridgend.

Submitted by Mr & Mrs Alexander, Neidpath, Whitelea Road, Burrelton.

'Neidpath'
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PH13 9NY

Ms Brenda E Murray
Local Development Plans Team Leader
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

21st June, 2009.

Dear Ms Murray

New Development Plan for Perth & Kinross

I refer to the above subject and your letter of 23rd April, 2009, regarding same and would thank you at this early stage in the process, of offering comment from interested parties.

The above formed very much the basis of a previous submission on the Perth Local Plan 2005 and which for simplicity, I have copied and attach to this letter, as my observations and concerns have not changed in the intervening period, unfortunately, I have not retained copies of the books of photographs that accompanied my submission and trust that these are still 'on file'.

The sentiments expressed in my submission are genuine and based on concerns for appropriate balance to be achieved in addressing the needs of the community at large, but not to the overall detriment of those currently living in the community. The foregoing equally applies to the need for proper and appropriate infrastructure, such as access roads and schools which are of primary importance.

You will note within my submission that I emphasised that I am not against development of the Site ALT H10 that lies to the rear of my house, but expressed deep concern regarding the proposal for 70 houses. However, I have noted that there now appears to be an amended thought or proposal for 15 low density quality houses, which seems to be much more appropriate and considerate to the location and local environment.

I would appreciate being kept informed of progress with the Development Plan, particularly any proposals for the Burrelton/Woodside villages.

Yours sincerely

‘Neidpath’
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PH13 9NY

Ms Brenda E Murray
Local Development Plans Leader
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

10th December, 2010.

Dear Ms Murray

Development Bid for inclusion in Main issues Report – Land at Burrelton

I refer to the above subject and bid submitted by Voigt Partnership on behalf of AJ Stephen Ltd and Stewart Milne Homes and would immediately comment on the content of two copy letters associated with the above and submitted by James R Brown dated 28th May and 17th June, 2009, regarding a plot of ground to the south of Whitelea Road at the western extremity of the village.

I was aware of the initial application for development of the site up to the 30 miles per hour signs depicting the end of the village and to which I have absolutely no objection and intimated that at that time. However, this would appear to have been superseded by the latter and extended application and to which I had no knowledge and opportunity to express an opinion.

In regard to the foregoing I consider this expanded application as inappropriate as it would seem to unnecessarily extend the village boundary on the southern side of Whitelea Road and create a most unusual western entry to the village and alteration of the 30 miles per hour restrictions. Furthermore, with the many other proposed sites for Burrelton and Woodside, this simply does not appear to make any planning sense whatsoever.

As has been identified many times, the lack of water services in the combined villages is an on-going problem that, quite simply, has been tinkered with over the years. Equally, the educational facilities at the local primary school have been at capacity for many years and, quite frankly, where the building is outdated and not suitable for purpose. For example, due to pressures on classroom accommodation, physical education is now undertaken at the local village hall, involving the children being escorted 700 metres (there and back) with the equipment stored in a goods container in the hall car park!!

The planned development to the north of Hall Crescent is now under way, where I believe a total of 25 houses are to be built. Assuming that some of the in-coming households will have children of primary school age, the further pressures on the local school are only too obvious.

Given the foregoing, it seems to a non-expert like me that any future housing development in Woodside and Burrelton, should not be contemplated until these two basic requirements are addressed and where, given the sheer scale of the proposals within the report by Voigt, a completely new school should be built. Furthermore, this should be on a new site as the present one is on a restricted site, ill-served by narrow access streets and the fact that it is in a 'dead –end' and opposite farm buildings. A site suggestion is referred to at the end of this letter.

Turning now to the various sections of the above report where, for ease of reference, this will simply be followed through using the Paragraph numbering. Commencing with Paragraphs 3.1/3.2 it is noticeable that the phasing of such laudable objectives is not referred to and where and when retail development and a recycling centre would be sited. It strikes me at this moment that the 'cart is before the horse' as seems to be the experience of all these processes and where one only needs to consider Scone and the fall-out experienced there.

Paragraph 3.4.1 refers to Phase 1 and is linked with Paragraph 3.8 where access to the site is via Whitelea Road. Being a resident on that street and witnessing the continual flow of farm and forestry traffic, along with normal day to day traffic, one is left with the thought that like the school, it is not fit for purpose. Paragraph 3.5.1 refers to Phase 2 which seems to be that to the east and west of the A.94 Perth to Forfar Road, to the south of the present village and up to a point opposite Nethermill Farm. This would require a southern extension to the village boundary, which I view as unnecessarily increasing the overall length of the combined villages and where a general broadening to the east and west would seem to be a more logical and environmentally friendly progression, without the need for the proposed access roads through farmland.

Paragraph 4.2 refers to a 'substantial allocation' within the emerging Local Development Plan, which leaves one a bit in the dark as to actual figures, however, such phraseology suggests that no consideration by Voigt has been given to 'the net local effect'.

My response to the content of Sections 7 and 8 of the Report has largely been covered by my previous letters on this subject. However, I again note at 8.2 there is reference to 70 houses at VH17 being accessed off School Road, which as previously identified is completely unsuitable. Equally, such a number of houses on the site would be completely and utterly outwith the style and nature of the surrounding properties to the east and south of the site. It would therefore appear that Voigt have taken no cognisance of the content of Paragraph 9.7 of their own report where they quote Policy 6 of Sustainable Communities.

Paragraph 11.1 Appears to contradict Paragraph 3.8 of the report with regard to access.

The areas discussed will have significant environmental and visual effects on the southern and western aspects of the village, both for existing householders and visually from the A.94 Perth to Forfar Road and where, despite reassurances from developers at the outset, their laudable plans with regard to impact, environment, social and community areas and considerations, appear to be seldom met or carried out in full.

In conclusion it has now been identified on a plan that a considerable parcel of land to the west of Manse Road/The Beeches (08.9171 and 09 9029) is proposed for

development. In this regard I am aware that an application for consideration has been submitted and where the applicant is correct in identifying this as a discreet site. It is below the general level of the village, screened by many mature trees and would have little visual impact on the few adjacent properties. Equally, it is conveniently much closer to the sewerage works at the northern eastern extremity of Woodside and where access from the A.94 Perth to Forfar Road would, on the face of it, be a simpler road improvement exercise.

If undertaken, this proposed site would have the effect of 'rounding off' the village on the western side and would presumably obviate the need for the large and visually impacting southern extensions to the village. Indeed, this latter comment may equally apply to the need to develop all the other identified patchwork sites in the two villages. It may also provide an ideal site for a new school and which would be adjacent to the local football pitch, thereby offering sporting facilities that are sadly lacking at the present school and site.

All things considered, this new site has so many commendable features, it should really be identified as Phase 1 and particularly in view of the present and indeed into the foreseeable future, substantial downturn in the housing market.

Yours sincerely

From: Mabel Sharp [REDACTED]
Sent: 21 February 2012 12:10
To: TES Development Plan - Generic Email Account
Subject: Proposed plan
Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir, I was very interested to view the suggested plans for future developments in and around Perth, with particular interest in plans for Scone. My immediate reaction was that I really consider that more development in this area would be most detrimental, and I cannot see where the benefits would arise. Scone does not have the infrastructure for such development. There are so many problems with sewage and flooding the ridiculous number of houses being suggested would ruin village life altogether.

May I suggest that the area designated H17 should be developed without delay. That area would have the required access to Motorways, and all support required .

As you will be aware, Scone is suffering very, very badly from so much heavy traffic blocking up the centre of the village, and ruining so many houses on Perth and Angus Road, that there will be claims laid at the door of Perth Council very soon indeed.

Yours faithfully, Mabel W. Sharp.

From: craig william [REDACTED]
Sent: 27 February 2012 17:04
To: TES Development Plan - Generic Email Account
Subject: Development Plan, Grass Area, Woollcombe Square, Scone.
Follow Up Flag: Follow up
Flag Status: Green

Good Afternoon,

The grass area in Woollcombe Square, Scone is shown on the Development Plan shaded green, indicating that it will be deemed an area of open green space.

I visited Pullar House and spoke to a very helpful lady in Reception, who advised me that she could deal with Planning matters and produced a map of Scone, showing the Woollcombe Square grass area and pointed out that the grass, shown in green, would be declared an area of open green space and as such planning permission to build on the land would not be granted. She also pointed out that the land was the only area of green open space in the locality as being worthy of being open green space.

It was heartening to hear this and on behalf of my wife and I, I would strongly request that the Council declare the rear as open green space and maintain the ambiance and peacefulness of Woollcombe Square.

Yours faithfully

William J M Craig.

29/02/2012

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

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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	Mr & Mrs J S Milne
Address and Postcode	Dorwen Whitelea Road, Burrelton, Blairgowrie PH13 9NY
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.	E8 Proposal for development at Whitelea Road	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 include the reason for supporting the Plan/requesting a change.

We agree that E8 is only suitable for general employment and its use must be compatible with residences in the immediate area.

Your letter states that E8 is private ground although we believe that it belongs to Perth and Kinross Council. In April 1998, 276 square metres at the west end of the site was purchased by us from Perth and Kinross Council.

Does this site still belong to Perth and Kinross Council? If not who owns it?

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**

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

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

Name	Mr & Mrs J S Milne
Address and Postcode	Dorwen Whitelea Road Burrelton, Blairgowrie PH13 9NY
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.	H 16 School Road, Burrelton	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.

We are not supporting the Plan.

1. This site, currently known as H16, (previously known as 230 on main issues report), and (ALT 10 on the previous PALP) should not be extended on the west side and should remain as it was in the previous PALP ALT 10.
2. Housing should be low density as stated in Main Issues Report 2011

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

1. Any increase in the size of the village should be encompassed to take in the area north eastwards of H16 and Burrelton Primary School as shown for consideration in Main Issues Report 2011 (sites 235 and 236)
This area could be accessed from Scott Street which gives clear and unrestricted access to the main road A94.
H16 could be connected by a service road and footpaths to the primary school and adjacent dwellings and also to H17 and Cameron Walk without influence or contact from the existing traffic on the busy main A94. Thereby improving road safety in the village.
A new Community Hall/Sports pavilion should also be built adjacent to the school at H16 and this would serve both the Primary School and the village and other local organisations.
Further consideration to creating a sports and leisure facility in this area should be explored which should include playing fields and football pitch.
It is of paramount importance to the existing residents of the village, that if such large scale development happens then there must also be large scale benefits to the residents and amenities of the village in general.
2. If the H16 site is approved then it should be only low density housing to blend with the adjacent houses. Whitelea Road could only sustain a limited amount of traffic due to its width and construction and certainly not to the size of site and density of housing proposed.

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**

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

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 & Mrs J S Milne
Address and Postcode	Dorwen Whitelea Road Burrelton, Blairgowrie PH13 9NY
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.	H17 Church Road	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.

We do not support the plan.

1. Increase size of Site H17 Westwards into areas (236 and 235 of Main Issues Report 2011)

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

1. To compensate for our suggestion of reducing the number and density at H16 and thus keeping the village compact instead of elongating it. This extra area of the site would allow ample housing and development area which would be contained within the central part of the village and would not be obtrusive from any of the existing entrances to the village.

Housing should be low density and in keeping with surrounding properties.

We agree H17 be accessed through Cameron Walk and could be connected with a service road and footpaths to the Primary School thus keeping pedestrians safe from A94 traffic.

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

Local Development Plan Team
Perth & Kinross Council
Pulley House,
35, Kinross Street
Perth
PH1 5GD

RECEIVED
10 APR 2012

R.J.A. Exley,
South Valleyfield
Enrol
Perth PH2 7ST

5th April 12

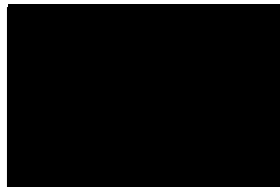
Dear Team,

Proposed Land Development Plan: Representation

I attended at length a Presentation concerning the Land Development Plan, and overall I approve what is proposed.

My particular interests are in the whole care of Goonie and the importance of resisting any erosion of its qualities and agricultural functions. In the regard the Plan has my unequivocal approval for excluding in this area any further introduction of non-agricultural enterprises or activities and the irreversible destruction of farmland, especially arable land, by building development.

Yours faithfully,



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	R R Mackay
Address and Postcode	See attached letter
Telephone no.	
Email address	

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.	A9 / A85 junction: link road 102 at crematorium	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.

See attached letter - originally submitted in respect of planning application.
Wish same points to be considered in respect of local development plan

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

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

LATE COMMENTS

CP

RECEIVED
16 MAR 2012

Rep no. 08100/1
7 Smith Place,
Leam, Jain,
Ross-shire
IV20 1TH.

15th March 12

Planning and Regeneration
Head of Service David Littlejohn
Pulley House
35 Kinnorell St
Pesth

Ref No 11/01579/FLL

Dear Sir,

Upgrading of roads infrastructure including the formation of slip roads, roundabouts, bridges, SUDS ponds, landscaping and diversion of culverts site 450 metres north of the A9 and A85 junction Pesth.

I object to any part of the reconstruction that would encroach in any way on the crematorium garden of Pesth.

If there is future development would you please advise me by post
Yours faithfully

Late response letter sent 16/3/12.

RECEIVED
05 APR 2012

33 Abbey Road
Scone
Perth PH2 6LW

Perth & Kinross Council
Pillar House
35 Kinnoull Street
Perth PH2 5GD

re Scone Development Plan.

Dear Sir,

Yet again I find myself writing to register my opposition to the proposed development of hundreds of houses in Scone. The smaller development on the site of the old Glebe School I support, despite living so close - I am sure it will be preferable to boarded up and broken windows, but I contest the other site at the top of the village on many counts.

Scone is a VILLAGE. Such a large development is wholly inappropriate, as the resultant population increase would result in the equivalent of a small town, without a town's infrastructure - a dormitory site.

The school would struggle to cope. If the Glebe School site is built on, then there does not seem to be

any provision made for a new school.

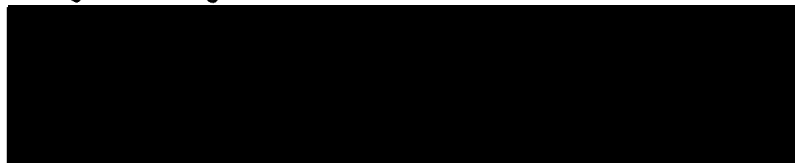
This is inappropriate use of agricultural/greenfield land with resultant environmental degradation. There will be inevitable change to water run off/flooding prospects (already noticed,) which will add to the problems caused by changing weather patterns.

In the current economic climate, the scheme would produce commuters - not helpful to Seme's traffic problems.

Above all it would have an adverse effect on the social cohesion and attractiveness of Seme: enlarge the village by such a huge amount and the very things which attract people to live here are destroyed.

I write in despair. Does anyone listen when a community expresses an opinion, or is the consultation exercise merely a legal formality, the result of which can safely be ignored?

Yours faithfully,



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

Name	David Penman, as secretary to Perth & Kinross Tree Warden Network
Address and Postcode	6 Arthurstone Gardens, Meigle, Blairgowrie, PH12 8QY
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 checked="" type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

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

Forestry & Woodland Strategy.

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

Policy ref.	The Historic & Natural Environments, policies HE4, NE1C, and NE2	or			
Site ref.		or			
Chapter	3	Page no.	39, 40, 41 & 42	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.

Historic Environment, policy HE4 - Gardens & Designed Landscapes: We endorse the submissions made by Christopher Dingwall.

Natural Environment, para 3.9.2: The Ecosystems Services Approach should be attributed to SNH.

Policy NE1C: Local Designations should be attributed to PKC.

Policy NE2 - Forestry Woodland & Trees: The material should be re-ordered and supplemented (a) to refer to Scottish Forestry Strategy (b) to separate out the LPA's roles as consultees, in development management, & in conservation/protection; & (c) to convert the intended supplementary guidance to policy.

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

Policy HE4 - for all the reasons adduced by Christopher Dingwall.

Para 3.9.2 & policy NE1C - adding these attributions would provide a linkage for any reader to understand the LDP.

Policy NE2 - The published text is obscure as to its scope, and therefore open to confusion and weakness in application. It is deficient in not laying down essential policy regarding consultations from or with FCS for new planting schemes, or for development control over trees in conservation areas, or for TPO's. The scope of suggested policy under the 3 LPA functions might be as follows:

1. Add a preamble to say that the LPA policies will be in line with government's "The Scottish Forestry Strategy 2006".
2. Separate out policy content into 3 sub-paras of policy NE2 according to the LPA functions regarding trees, viz:
 - (a) The LPA as consultees from FCS regarding planting proposals and Tree Felling Licences. State that the LPA will support such forestry & woodland management proposals as accord with their own policy & supplementary guidance (FWS), unless material considerations of local economic, community or environmental importance suggest otherwise.
 - (b) The LPA as a development control authority. State that the council will support development proposals that accord with their adopted FWS and other relevant policies. State the requirements for tree and hedgerow surveys by approved professional arborists to accompany applications, together with (selectively) impact studies on the existing landscape framework around the site. Emphasise that (a) applications where the site has manifestly been cleared of trees to maximise development will not be favourably considered, and that (b) any planning conditions relating to trees will comprise protection during construction and management after completion.
 - (c) The LPA's role in relation to conservation and protection of trees. Refer to (describe?) the LPA's dual role as designators of conservation areas and promoters of TPO's. State the council's resolve to include proposals for tree management and planting when preparing their CA appraisals, and emphasise the inclusion of hedgerows in the definition of trees. Resolve to develop a Model TPO as advocated in Circular 1:2011 as a means of expediting control, and resolve to take vigorous enforcement action against unauthorised topping, lopping or felling.
3. Supplementary Guidance. Express the resolution to produce this guidance as a 4th sub-para of policy NE2. State that the guidance will be developed with regard to FCS advice, particularly that contained in their publication "The Right Tree in the Right Place". Review the need for the published list of objectives as a result of this. Commit the council to public consultation before adoption. Please note that we would be pleased to comment further as the FWS is developing.

End of submission

David Penman, FRTPI (rtd) ARIAS (rtd)

Save a copy

Print

Submit

23 MAR 2012

CHRISTOPHER H. DINGWALL ~ GUIDELINES

HERITAGE LANDSCAPES ~ DOCUMENTARY RESEARCH, SITE ANALYSIS, INTERPRETIVE PLANNING

WASHINGTON HOUSE, MAIN STREET, ARDLER,
BLAIRGOWRIE, PERTHSHIRE, PH12 8SR

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

20 March 2012

Dear Sir,

PERTH AND KINROSS LOCAL PLAN - CONSULTATIVE DRAFT GARDENS AND DESIGNED LANDSCAPES

I am writing with particular reference to **Section 3.8** and **Section 3.9** of the consultative draft of the *Perth & Kinross Local Plan*, concerned with the *Historic Environment* and the *Natural Environment*. While I cannot disagree with much of what is contained in these sections of the plan, I should like to draw particular attention to what I see as the **inadequacy of the plan with regard to gardens and designed landscapes**.

Among the more general points to be welcomed in the draft *Local Plan* are those which recognise the contribution which woodland and other elements of designed landscapes make to the distinctive scenic character and quality of the county's rural and urban landscapes. As is to be expected, the plan makes reference to the Scottish Government's planning policies, as set out in the latest version of the *Scottish Historic Environment Policy (2011)* and in *SPP 23: Planning and the Historic Environment (2008)*. Thus, *Policy HE4: Gardens and Designed Landscapes* in the *Local Plan* states that "The Council will seek to protect and enhance the integrity of those sites included in the current *Inventory of Gardens and Designed Landscapes*". Given the crucial part which designed landscapes play in determining landscape character throughout Perth and Kinross, however, this seems a limited and poorly worded commitment, especially when viewed beside the more detailed statements concerned with the protection of the natural environment. Furthermore, **this policy fails to reflect the Scottish Government's current position with regard to designed landscapes**, as set out in the above-mentioned *SHEP* and *SPP*.

I would refer you in particular to *PARAGRAPH 3.79* of the most recent *SHEP (2011)* which draws attention to "... the many sites... which do not meet the criteria for national importance, but nevertheless make an important contribution to the local historic environment and landscape character of the area. Planning authorities are therefore encouraged also to develop policies within their development plans for the identification and future management of such non-Inventory sites in their areas". This is mirrored in the statement contained in *SPP23 (2008)* which encourages local authorities "... to safeguard and enhance Inventory sites, and also other important gardens and designed landscapes". *PARAGRAPH 3.80* goes on to state that "... Planning authorities should use appropriate conditions to protect and enhance

sites on the Inventory [and] ... are encouraged to obtain management plans for gardens and designed landscapes from owners, both to identify conservation needs, and direct how change can be best accommodated".

The existing ***Inventory of Gardens and Designed Landscapes in Scotland*** identifies 41 sites across the length and breadth of Perth and Kinross as being of national significance. However, this is but a small proportion of the total number of designed landscapes to be found within the county. Independent regional surveys carried out elsewhere in Scotland suggest that ***Inventory*** sites represent less than 20% of the total number of significant designed landscapes in any given area. Thus, a recent survey carried out for **Scottish Borders Council** identified over 180 significant landscapes, of which only 31 are listed in the ***Inventory***, approximately 17% of the total. Another survey carried out on behalf of the three **Ayrshire Councils** identified over 150 designed landscapes, as against just 20 sites listed in the ***Inventory***, approximately 13% of the total. Based on such evidence, it is likely that there will be in the order of 300 significant designed landscapes within Perth and Kinross. Whether publicly or privately owned and managed, many of these non-***Inventory*** sites must be regarded as of regional or local significance, whether for the contribution which they make to scenic character and quality, for the recreational opportunities which they offer to local communities and tourists, for their botanical interest, and in other ways.

Of relevance to this point are other policy documents such as the ***European Landscape Convention (2000)***, of which the Scottish Government is a signatory. This convention acknowledges "... that the landscape contributes to the formation of local cultures ... [and] is an important part of the quality of life for people everywhere ; in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in everyday areas as well as areas of outstanding beauty". **ARTICLE 5** of this document states that each signatory undertakes "... to integrate landscape into its regional and town planning policies", while **ARTICLE 6** states that each signatory pledges "... to identify its own landscapes throughout its territory", and "... to put landscape policies into effect... [through] instruments aimed at protecting, managing and/or planning the landscape". Scotland's own commitment to the ***European Landscape Convention (2000)*** is reflected in the document ***Scotland's Landscape Charter 2010***, drawn up by the **Scottish Landscape Forum**, and published by **Scottish Natural Heritage**. This document, in the drafting of which **CoSLA** was closely involved as a member of the Forum, speaks of the need "... to raise awareness of the role of local and national designations in safeguarding valued landscapes". Finally, SNH's discussion paper ***Scotland's Future Landscapes : Encouraging a Wider Debate (2003)*** drew special attention to the vulnerability of designed landscapes, concluding that, although "... designed landscapes contribute greatly to the appearance of the rural landscape, their long term survival remains at risk, and will not be secured without targeted action."

In recognition of the important role played by the woodland element of designed landscapes in determining landscape character, the **Forestry Commission (Scotland)** has recently published new advice entitled ***Conserving and Managing Trees and Woodlands in Scotland's Designed Landscapes : Practice Guide (2011)***. This advice is aimed at all those involved in the management of woodland, whether privately or publicly owned, and ought to be drawn to the attention of all those involved in landscape planning and management – not least local authority officers involved in town and country planning. In this regard, the ***European Landscape Convention (2000)*** requires the signatories to "... promote training in landscape appraisal, [and] ... in landscape policy, protection management and planning for professionals in the private and public sectors". I enclose a copy of this publication for your information. Further copies can be obtained from the Forestry Commission.

With the above-mentioned points in mind, I strongly recommend that Perth and Kinross Council revise its policy with regard to gardens and designed landscapes, both to align itself with current national policies, as expressed in current Government documents such as *SHEP (2011)* and *SPP23 (2008)*, and to reflect the spirit of related documents such as the *European Landscape Convention (2000)*.

In summary, I would suggest that the new *Perth and Kinross Local Plan* ought to

- acknowledge the **contribution made by all designed landscapes**, both *Inventory* and non-*Inventory*, to the character and quality of the county's landscape.
- include a **commitment by the Council to identify significant non-Inventory designed landscapes** within the county, in line with *SHEP (2011)*, with a view to protecting their integrity and enhancing their character as far as possible, within the evolving rural and urban landscape.
- state that **applicants may be required to submit management plans** as part of any application for development with an *Inventory* landscape.
- contain a statement to the effect that **permission may be refused, or conditions may be attached to any grant of permission for development**, where this is seen to adversely affect a designed landscape, whether *Inventory* or non-*Inventory*.
- contain a **commitment by the Council to draw up its own supplementary guidance** on the management and restoration of designed landscapes within Perth and Kinross, to complement that available from the **Forestry Commission**.

In connection with the last of these points, you may wish to look at weblinks :

< http://www.scotborders.gov.uk/downloads/file/2945/survey_and_outline_strategy_report > and
 < http://www.scotborders.gov.uk/downloads/file/2946/guidance_on_management_and_restoration >
 which arose from the aforementioned regional survey of gardens designed landscapes in the Scottish Borders, carried out by Peter McGowan Associates on behalf of Scottish Borders Council in 2007-2008.

Finally, I would also ask that in *Paragraphs 3.8.2* and *3.8.3*, the references to the *SPP* and *SHEP* be **specific as to the version and/or date of publication** of these documents, as there are many *SPPs*, and there have been three versions of the *SHEP*.

Having served for twelve years as Conservation Officer with the Garden History Society in Scotland from 1992 to 2004, and having lectured to postgraduate students in the School of Town and Regional Planning at Dundee University, I am aware that little attention is given to gardens designed landscapes in the training of planners. I would therefore encourage the Council to ensure that its planning officers are made aware of this vital part of the county's cultural heritage through appropriate training.

Yours faithfully,



Christopher Dingwall

Copied to : *David Penman, Secretary, Perth & Kinross Tree Warden Network*
Alison Allighan, Conservation Officer, Garden History Society in Scotland

From: Deirdre McVean [REDACTED]
Sent: 28 March 2012 07:19
To: TES Development Plan - Generic Email Account
Subject: Letter dated 26/1/12:proposal for development at Welton Road, Blairgowrie
Follow Up Flag: Follow up
Flag Status: Green

With reference to your letter of 26/1/12, reference S13/2, please consider this representation.

1. A.D.McVean, 26 Moyness Park Drive, Blairgowrie, PH10 6LX
2. Letter to occupiers giving notification of publication of proposed Local Development Plan
3. Proposal for development at Welton Road, Blairgowrie, site reference E31
4. We want to see a change in the plan as this is prime agricultural land which would be lost if it was turned into land for general employment use
5. Land for general employment use should be on a brown field, not a green field site.

If it does proceed we trust that all the site specific requirements will be rigorously enforced by Council Officers, in particular:
flood risk assessment;
evaluation of archaeological potential; and, especially,
the retention of the wooded area where there are roe deer and evidence of red squirrels which are a protected species. Putting a distributor road through and part of the wood would damage a sensitive area.

Reference is made to a master plan for the comprehensive development of this site. Whose responsibility is it to draw up this plan?
What exactly is meant by 'general employment use'?

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.

Comments on the Proposed Plan for the Perth and Kinross Development Plan published on 30 January 2012

(With particular reference to sites E31 and H62; Strathmore and The Glens)

Policy HE1B, Non-designated Archaeology states '*The Council will seek to protect areas or sites of known archaeological interest and their settings.*' We note that site H62 has two areas or sites marked and that the intention is to landscape both of these. There is at least one further area on site H62 which is a souterrain located in the south east corner of the site. It is clearly marked on the map which accompanied Perth and Kinross' 2005 Draft Development Plan. It is very possible that there is further archaeological potential throughout the entire site as indicated in the ancient monuments records held at The Royal Commission on Ancient and Historical Monuments, Scotland (RCAHMS). It is therefore essential that a full and comprehensive archaeological survey is carried out by RCAHMS and Historic Scotland.

Site reference E31

We want to see a change in the proposed plan as this site is prime agricultural land which would be lost if it became land for general employment use. Land for general employment use should be on a brown field, not a green field site.

If this change of use does proceed we trust that all of the site specific requirements will be rigorously enforced by Council Officers, in particular:

- Flood risk assessment as parts of this site are prone to flooding;
- Evaluation of archaeological potential; and, especially
- The retention of the wooded area which is home to roe deer and red squirrels the latter being a protected species. Running a distributor road right through the middle of this wood would give rise to serious damage to a sensitive area.

Policy EP3C, Surface Water Drainage (page 34)

In connection with the current Rosemount Meadows development by Miller Homes on Coupar Angus Road, Blairgowrie, Scottish Water has stated that Blairgowrie Waste Water Works currently has, at present, the capacity to cope with this development. Miller Homes has put in retrospective planning for individual soakaways. If, when site H62 is developed, the Waste Water Works still has the capacity, we trust that policy EP3C will apply requiring all new developments to employ Sustainable Urban Drainage Systems measures rather than individual soakaways to the minimum required standards as is the case with Rosemount Meadows. Will a Drainage Impact Assessment be a necessity prior to approval of any planning application?

Paragraph 4.3.8 (page 63) and paragraph 4.3.9 (page 64)

We recognise that the figure of 1055 additional houses required in Strathmore and The Glens is aspirational and dependent on an upturn in the current economic climate, including the construction industry. However, the following questions have to be raised:

- As the sale of homes on the market in the Blairgowrie area is currently very slow, why is there the need to build additional houses?
- Why should productive agricultural land (sites E31 and H62) be sacrificed for employment use, to build houses and to provide the distributor access road?
- Would the infrastructure (schools/medical services/utilities/sewers) cope with another 595 houses in Blairgowrie?
- Paragraph 4.3.12 states that *'Scottish Government guidance and good planning practice encourage new development to utilise brown field land where possible.'* The development of sites E31 and H62, both of which are productive green field sites is not using resources sparingly or wisely.

H62: Welton Road (Residential site)

We have a concern about the use of a green field site, productive agricultural land, for building on when brown field sites are available elsewhere in the vicinity which are not shown on the plan for development. Is the hidden agenda the fact that the developer will be required to fund the cost of the next phase of the contentious distributor access road?

When the master plan referred to in paragraph 9.3.2 on page 82 is drawn up, will local residents be invited to be involved?

What is meant by 'an appropriately phased manner'?

The proposed density of 13.05 houses per hectare is in keeping with existing houses in the neighbourhood. If this development does go ahead we request that this density is adhered to and not the over-developed, over-crowded and uncharacteristic development which is currently being built by Miller Homes on Coupar Angus Road, Blairgowrie. We also request that any approved style of houses is in keeping with existing properties in the vicinity ie bungalows or 1½ storey dwellings as we have concerns about loss of privacy.

We have concerns about the loss of any of the wooded area and trust that site specific requirement 8 is fully enforced.

As stated at the beginning of this response it is essential that a full and comprehensive archaeological survey is carried out.

In Policy RD4 of the proposed Development Plan (Affordable housing) it reads that the 25% affordable house element should be integrated with and indistinguishable from the market housing. As this is a 100% owner/occupier area we ask that the affordable housing element is either shared equity or low cost homes for first time buyers and not social housing for rent.

Finally, the map of site H62 on page 285 in the proposed Development Plan shows two landscaped areas on the northern boundary whereas the map of the proposed development site which was issued with the letter from Planning and Regeneration on 26 January 2012 does not. The large display boards on view at the recent information events were the same as the former. We therefore ask why is there a difference in the two maps?

Submitted by:

J.G.McVean and A.D. McVean
26 Moyness Park Drive,
Blairgowrie,
PH10 6LX

From: Deirdre McVean [REDACTED]
Sent: 10 April 2012 09:56
To: TES Development Plan - Generic Email Account
Cc: fwdCaro line Shiers
Subject: Proposal for development at Welton Road, Blairgowrie
Follow Up Flag: Follow up
Flag Status: Green

Deirdre McVean,
26 Moyness Park Drive,
Blairgowrie,
PH10 6LX

Letter of 26 January 2012 to owners, lessees or occupiers ref S13/2: proposal for development at Welton Road, Blairgowrie.

Site reference H62

I wish to see a change to the plan.

I would like this proposed development of this site to be reconsidered because:
this is a greenfield site, productive agricultural land;
of the loss of any of the wooded area located between sites H62 and E31 and the inevitable impact on the wildlife therein;
of the loss of amenity and privacy as witnessed in the current construction on Coupar Angus Road where the trees along the northern edge were bulldozed at the very start of the development;
there is archaeological potential across the entire site and not just in the area marked on the site plan shown at the information event in Blairgowrie in February.

I have already submitted a full response to the proposed plan for Perth and Kinross Development Plan. I was uncertain as to whether a separate representation was required in respect of the letter of 26 January 2012

Edinburgh

Strutt & Parker LLP
28 Melville Street
Edinburgh EH3 7HA

struttandparker.com

RECEIVED

29 MAR 2012

STRUTT
PARKER

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

Our ref: JAW/LDWD/P&D/PKC/KinlochRannoch

27 March 2012

Dear Sirs

Perth & Kinross Local Development Plan – Proposed Plan

We write with reference to Site Reference H43 at Kinloch Rannoch.

Unfortunately, due to a change in circumstances, the owner of this site will not now be making it available for development within this Local Development Plan period and we would appreciate if you could remove this allocation from the Plan and consider relocating the housing numbers elsewhere in the area.

We apologise for any inconvenience this may have caused.

Yours sincerely

John Wright BSc (Hons) MRICS
Associate

cc: Ruth Bersi & Kate Barclay

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.

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 inspections, 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 & 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	Mrs J Maxwell
Address and Postcode	C/O Strutt & Parker (Ref: JAW), 28 Melville Street, Edinburgh, EH3 7HA
Telephone no.	
Email address	

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="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.		or			
Site ref.	MU6 - Spittalfield	or			
Chapter	9	Page no.	304-305	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.

We object to site reference MU6 and would like to see it removed from the plan.

We have put forward a site at Stonebroke Farm (see **Appendix 1**) capable of accommodating the proposed allocation (2.13ha for mixed use incorporating employment and up to 20 units).

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

Allocation Reference MU6

This land allocation was originally proposed for inclusion in the Eastern Area Local Plan Review – Draft Plan (July 2005) which was abandoned (extract at **Appendix 2**).

Since then, planning permission has been granted for a single dwelling (Meadow View) which has been built at the access to this site (Ref: 05/02231/REM) and we feel that this could prejudice (both the width of and visibility from) the only available access for the level of development envisaged on site MU6.

The site is brownfield and will therefore require investigations to be undertaken to establish any potential contamination resulting from its previous use.

There is also a military road running through the centre of the proposed site which requires archaeological investigations to be undertaken prior to development commencing which could significantly delay development if not severely restrict it.

It is interesting to note that, whilst this site was proposed for inclusion in the Eastern Area Local Plan (abandoned), there have been no specific representations by the owner of the site promoting it for development, or resolving the above issues. Having reviewed the information relating to the LDP preparation we cannot see any “bid” being submitted seeking its inclusion, nor any representation at Main Issues Report stage supporting its inclusion or demonstrating its deliverability.

It is our assertion therefore that due to recent development at the access since the allocation was proposed, this is now no longer an “effective” site and that either access, archaeological or contamination issues are preventing development coming forward. It is therefore not appropriate to include in the emerging Local Development Plan a site which is obviously constrained, and unlikely to come forward in the timescales available.

Proposed site at Stonebroke Farm

We therefore propose an alternative site, free from constraints, to the west of the village for a development of approximately 23 units with provision for mixed use through live/work which may be more appropriate to the area.

The architect, Mr John Manning, working on this project has consistently submitted this site for consideration to be included in the Local Plan, and these representations follow his promotion of the site.

We attach for your information an extract of the SEPA Indicative 1 in 200 Year Flood Map (**Appendix 3**) which confirms that the site is not affected by flooding. This would appear to be supported by the Councils Environmental Statement which similarly identifies the site as being outwith the flood area.

We attach an extract of the SNH Mapping System (**Appendix 4**) which confirms that the site is not within, or adjacent to, any European natural heritage designations.

We have attached an extract of the Historic Scotland Past Map (**Appendix 5**) which confirms that the site is not identified as being of archaeological importance, there are no listed buildings or schedule of ancient monuments in close proximity to the proposed development and that, aside from the Military Road to the north of the site which may require some investigation where access is to be formed, there would be no constraint on development.

We have attached an extract of the Core Paths Plan (**Appendix 6**) demonstrating that the site can be well integrated with the existing Core Path Network (reference SPIT/121, SPIT/139 and SPIT/141) providing strong linkages to the school and services in Spittalfield as well as to the wider countryside.

Whilst the land may appear to be an uncharacteristically flat and elevated in the landscape, we have checked the historic Ordnance Survey Mapping (extracts attached at **Appendix 7**) which confirms that this feature has always been present in the landscape and is therefore not considered to be “made ground”. Contamination is not therefore considered to be an issue requiring further investigation, or that would prevent development from happening.

We have attached a plan (**Appendix 8**) for your information identifying the bus stops, shop/post office, garage and school which demonstrates that this site is within easy walking distance (400 meters) from the shop and bus stops as well as being manageable walking distance (732 meters) from the school and approximately 630 meters closer to the school than the currently identified site.

The proposed development (see attached plans at **Appendix 9**) demonstrates how a mixed use development of this site could work with the contours, existing landscape features, and infill a logical gap between Bowling Green Cottages and Stonebroke Farm in a way that avoids the perception of linear development, enhances pedestrian linkages to the school, is in close proximity to the shop, pub, post office and bus stops and would encourage non-car modes of transport for local trips, such as to the school. Development in this location is also likely to improve accessibility to, and use of, the existing recreational open space on the opposite side of Military Road.

Whilst we acknowledge the limited capacity (less than 10 dwellings) at the Spittalfield WWTW we understand that if allocated, Scottish Water would carry out a growth project to provide sufficient capacity for this development and should any local work be required to connect this development to the WWTW this would be carried out by the developer. We have checked online and according to the most up to date information there is sufficient capacity in the water supply for this development.

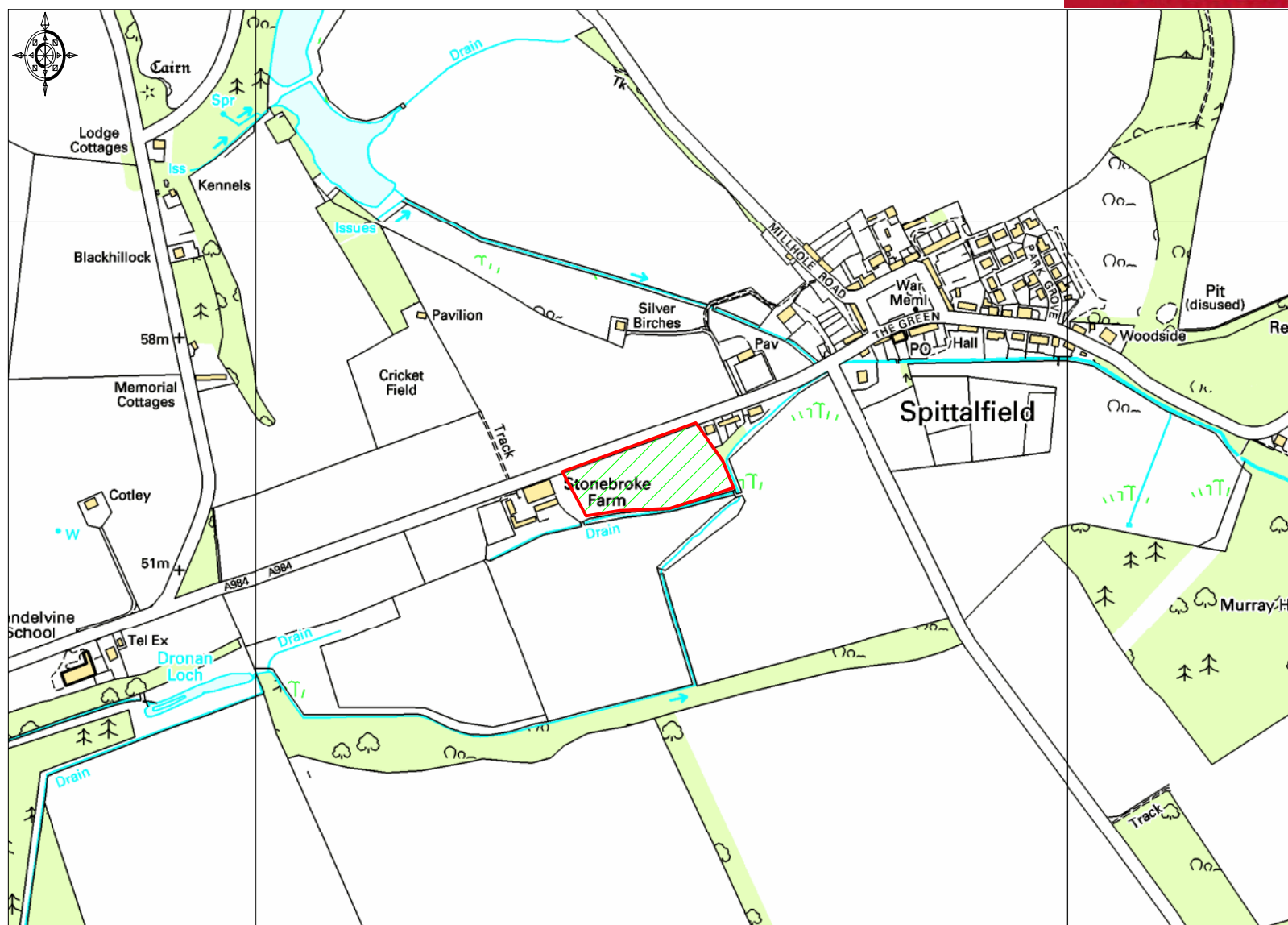
Conclusion

We feel that there are sufficient question marks over the deliverability and effectiveness of the current mixed use allocation which would justify removing its proposed allocation from the Emerging Local Development Plan and allocating this site instead.

If the Council or Reporter requires any additional information from us in relation to this proposed development, we would be delighted to have the opportunity to provide it.

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.

Perth & Kinross, Spittalfield, Land at Old Military Road

**STRUTT
& PARKER**

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

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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	A Ritchie & Son and M & S M Bullough
Address and Postcode	c/o Strutt & Parker LLP (ref: JAW), 28 Melville Street, Edinburgh EH3 7HA
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.	H70 Perth West	or			
Chapter	5	Page no.	76, 77 & 78	Paragraph no.	5.2.5 & 5.2.6

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.

Whilst we are supporting the plan, we would like to see the following changes:

Produce SG on Infrastructure Developer Contributions for consultation in the short term, in advance of Examination. Reflect in the contributions mechanism that this infrastructure will benefit a much wider catchment than just development on the western edge of Perth.

Amend proposed LDP allocation H70 to indicate phasing from the north with “Huntingtower View” being delivered in the short term for a first phase of 500 dwellings (with a further 300 dwelling second phase) and mixed use (employment/primary school). Phasing would then logically deliver development on the A9 frontage to the south, meeting in the middle in the longer term.

Amend the proposed H70 allocation to clarify that CHP/District Heating is a preferable optional feature to be investigated, not a mandatory part of the allocation. Provide a framework for integrated masterplans to be prepared.

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

INFRASTRUCTURE CONSIDERATIONS (pg. 76)

As set out elsewhere in our representations, we have no issue with contributing towards Perth transport infrastructure improvements and support the possibility of front funding of these in the short term to enable development to come forward. However, at this stage, there is no clarity as to what these might be, and therefore what impact they could have on development viability.

We would be keen to see the proposed mechanisms, and costing methodology sooner rather than later to inform development viability. It should be stressed that these features of infrastructure will benefit a much wider and longer term, development/catchment than that identified in this Local Development Plan. Similarly, in relation to the School Estate, as set out elsewhere we have identified an area which could be, if required, utilised for primary school provision however, in the event that the Almond Valley planning appeal is granted, a primary school is proposed on that site and in that case contributions would be made and the area currently identified revert to employment use (mix to be confirmed). This is currently subject to further study and additional information will be presented if requested by the Council/Reporter.

We note the aspiration for the two long term development areas and Site E38 at Ruthvenfield Road to integrate and work together to provide economies of scale in terms of district heating. However, this will need to remain flexible to incorporate any planning permission that may, or may not be granted on Almond Valley. The most logical location for CHP/District Heating, given the indication in the LDP that Industrial use is not appropriate in residential/mixed use areas, would be to locate this on the Ruthvenfield Road Industrial Area. There needs to be a framework provided for preparing integrated masterplans.

LONG TERM STRATEGIC DEVELOPMENT AREAS – REF: H70 PERTH WEST (pg. 77)

Whilst we acknowledge and support the aspiration for a large-scale strategic development site in this location, and have no issue with a comprehensive Master Plan being prepared for the longer term development with the relevant landowners (and are broadly supportive of the concept framework put

forward by the Lamberkin Trust), we are of the view that in order to achieve a five year rolling land supply, allocations need to be made and delivered in the short term that are both deliverable and effective. We are of the view that this can be achieved on the site at "Huntingtower View" without prejudicing the potential longer term development to the south or the overall Master Plan.

We have sought to promote "Huntingtower View" as an initial, and probably first, phase(s) of the H70 Perth West development representing 500 dwellings (with a further potential 300 dwellings) at a range of densities – of mixed type, tenure, and design with provision also made for employment land/primary school provision (precise provision subject to demand and will be confirmed). The information on which these representations are prepared is subject to further more detailed studies that are currently being undertaken and will be provided as supplementary information if requested by the Council/Reporters in advance of Examination.

As a naturally quieter part of the overall development area, with the potential of a supermarket (providing the core amenities required on a day to day basis) adjacent to it, this is a more logical area for a higher proportion (but not entirely) of housing.

We have attached for your information an Illustrative Master Plan for this initial and further phase(s), which indicates a proposed access solution for the scale of development envisaged, that can be enhanced at a later date to provide for full development to the west and south through the provision of a second access point linking to the A85 (or potentially further to the west) and potentially further to the south to the A9 (for buses if not vehicular traffic).

From the Illustrative Master Plan, you will see that facilities have been incorporated to enable the proposed expansion area to enhance connections to the bus network in the early stages of development through the provision of a Park & Ride facility on the western side of the A9 which should reduce pressure on the existing Huntingtower Interchange from traffic approaching Perth from the west and residents of the development travelling in to Perth.

The site has been laid out in a way that can be easily connected to the Core Path Network and Paths and Cycle Routes both into Perth, and the wider countryside as well as through the future development area to the south.

Whilst the development has been laid out in a way that responds to both the topography of the site and existing landscape features, including Huntingtower Castle, there may still be a loss of a small number of trees, the majority of existing mature trees will nevertheless be carefully retained, as will the majority of the existing stone dyke walls running north/south through the site. Additional compensatory planting will be introduced on the western boundary to enclose the development and screen it from long range views from the west (see attached Landscape Structure).

Whilst we acknowledge this does not represent the full scale of development envisaged, we do feel that this represents a very logical "urban village" and an initial phase(s) of the larger development. We feel this, together with other developments in the area, will assist in delivering the five year (and beyond) land supply with the potentially linking development to south coming at a later date and time as and when transport interchanges are in place and capacity is available

CONSTRAINTS

In line with PAN2/2010 (para 55) we have carried out the following assessment of "effectiveness" of Huntingtower View as an initial phase of a larger development:

Ownership – The land is in the control of owners who will make it available for developers to express their interest upon receiving an allocation in the Adopted Local Plan.

Physical - In terms of physical constraints, we can confirm the following;

1. Flood risk - We have attached an extract of the SEPA 1 in 200 Year Flood Map which confirms that the proposed site is not at risk of flooding in an extreme event.
2. Topography - The site is not constrained in any way due to slope.
3. Geology/Ground Stability – The site is not in an area that has a history of underground

mining. Ground investigations will be undertaken to establish the ground stability, but this is not understood to be a problem in this area.

4. Archaeology - There is a Scheduled Ancient Monument on the north western boundary of the site, and archaeological investigations, and discussion with Historic Scotland, will be required to establish whether this is likely to impact on development. For the timebeing, we have ruled out development in the Scheduled Area.
5. Vehicular Access is dealt with below under "infrastructure".

Contamination – We understand from the owners of the Quarry that inert fill has been used to fill it – Further information will be provided in advance of Examination. The remainder of the site has been in agricultural use and there have been no previously contaminative uses on it.

Deficit Funding – Subject to DIA connections may be made to the Perth WWTW where there is ample capacity for this scale of development – additional capacity will be provided by Scottish Water on receipt of an allocation in the LDP. Aside from this and the A9/A85 Interchange forward funding by the Council/Transport Scotland, there is no known deficit funding required to make this development deliverable.

Marketability – This area is extremely marketable and a number of developers have expressed a keen interest in acquiring land in this location. At this stage, and until the uncertainty over the allocation is resolved, and developer contributions established, no agreements have been reached with a developer for the site.

Infrastructure – Whilst only initial investigations have been carried out, we understand the following to be reasonably accurate at present:

1. Foul Water – We are investigating what will be required to connect to the Public WWTW and what local network improvements may be required to achieve that. It may be Perth WWTW, but further detail on this will be provided in advance of Examination if requested by the Council/Reporters.
2. Water Supply – Scottish Waters online capacity check indicates Turrett WTW has sufficient capacity for up to 2,000 (housing unit equivalents). Any local mains reinforcement to be established with Scottish Water and provided by the developer.
3. Gas – Within and adjacent to the site (precise location and implication for development to be established).
4. Electricity – Within and adjacent to the site (precise connection points to be established – any movement/undergrounding to be discussed with operator).
5. BT – Within and adjacent to the site (precise connection points to be established).
6. Access – We have commissioned SBA to undertake a high level, but robust, assessment of the current network capacity and opportunities for accessing this development. Their report is appended to this submission and has informed the Illustrative Master Plan (in terms of access, and layout being designing streets compliant). This will be subject to further detailed study over the coming months and updated work presented to the Council/Reporters in advance of Examination. In terms of Phasing, an application is already pending determination with the Council for the A9/A85 junction improvements, the other development areas all require junctions to be designed, consented and built before development can commence.

Land Use – As set out elsewhere, given the quieter nature of the area, and the proximity to existing (and proposed) facilities and services residential is the preferred use, however, accepting the need for mixed use development provision has been included for employment/primary school provision (to be confirmed) and Park & Ride as an integral part of the development.

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

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Address and Postcode	c/o Strutt & Parker LLP (ref: JAW), 28 Melville Street, Edinburgh EH3 7HA
Telephone no.	[REDACTED]
Email address	[REDACTED]

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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.	H70	or			
Chapter	5	Page no.	69	Paragraph no.	5.1.11

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.

Whilst we support the identification of Mixed Use Site H70 (Perth West) for an initial phase of 550 houses (as potentially increased in response to other representations and TAYplan Examination Reporters Report) plus a further potential development of 2,500 houses beyond 2024, we have sought changes to this which are set out elsewhere.

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

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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:		<input type="text"/>	

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

Policy ref.	Action Programme	or			
Site ref.	Action Programme	or			
Chapter	N/A	Page no.	N/A	Paragraph no.	N/A

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.

Bring forward the following earlier than currently envisaged and possibly in advance of Examination to inform proposals:

Perth West Masterplan, PM3, ED1a & EP3

Ensure no slippage on timescales for Western Edge Link Road.

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

Whilst we broadly support the actions identified, there are some elements that need to be progressed in advance of others to enable development to progress upon adoption of the Plan where possible.

- 1) Perth West Masterplan. Whilst various proposals have been put forward for this, clarity needs to be provided and a first phase released for development early in the plan period to help achieve a 5 year land supply.
- 2) Western Edge Link Road. We are supportive of the timescales envisaged for this, but given the importance of this to achieving the full development of Perth West this should not be allowed to slip.
- 3) PM3 – Supplementary Guidance on transport infrastructure contributions. Support this, but needs brought forward as a priority to inform development viability and masterplanning.
- 4) ED1a – Supplementary Guidance on appropriate employment uses in mixed use development. Support this, but needs brought forward as a priority to inform development viability and masterplanning.
- 5) EP3 – Supplementary Guidance on sewage infrastructure needs to be prioritised to inform masterplanning, and potentially to enable initial phases of development to proceed.

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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	4	Page no.	63	Paragraph no.	4.3.7 – 4.3.10

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.

Await outcome of TAYplan Examination of unresolved objections to allow clarity to be provided on the land requirements for housing to be delivered through the LDP to be clarified. Incorporate revised requirements and republish Proposed Plan for consultation. **OR**

In the absence of this clarity, which is required by SPP, from the information provided in the HNDA and HLA, make an educated estimate as to what that requirement (incorporating an allowance to provide a generous supply of land) might be, and ensure the LDP delivers it meeting need and demand in full in the areas it arises through allocations in this LDP.

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

Whilst we acknowledge the spatial strategy set out in TAYplan (in terms of strategic locations for growth and settlement hierarchy), and agree that the LDP Proposed Plan seeks to deliver that on the ground, we do not feel that there is sufficient clarity in the actual land supply requirements in TAYplan to enable to LDP to deliver those in full, with confidence.

LDP Paragraph 4.3.7 states that *“TAYplan has identified anticipated annual build rates which will be required to accommodate the projected population increases should they materialise. These estimated build rates have been used to inform the housing land requirement to 2024”*.

The approach adopted by TAYplan is not compliant with SPP and having reviewed the DPEA website relating to the TAYplan SDP – Proposed Plan Examination, there has been significant objection to this approach, including from the Scottish Government, and the Reporters have sought additional information to clarify the position.

We also understand, from the objections lodged, that it is not clear whether additional sites might need to be allocated in addition to the Strategic Development sites identified in Policy 4. The annual build rates provided have also been challenged and from the information available would appear to be considerably lower than is actually the case.

As a result of these objections, it is highly likely that there will be changes made to TAYplan which would need to be reflected in the Housing Land Strategy being delivered in this LDP.

We further object to the Table titled *“TAYplan 2010 – 2024 requirement Effective Housing Land Supply Shortfall”*. Given the above, and the fact that this table has been arrived at using the annual build rates provided by TAYplan, we consider the “Housing Requirement 2010-2024” column is a significant underestimate and may well increase following the TAYplan Examination.

We also object to the inclusion of 10% of the land supply being met by windfall sites. PAN 2/2010 (Para 62) is absolutely clear when it states that windfall sites *“arise unexpectedly and are therefore not part of the planned supply”*. There is provision for windfall to contribute to meeting the Strategic Supply but only where identified in an Urban Capacity Study or when Planning Permission is in place and it is considered to be effective. Small sites are dealt with separately and are capable of contributing to meeting the Strategic Requirement.

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Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	5	Page no.	68 and 69	Paragraph no.	5.1.6 to 5.1.8

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.

Provide a Title for the table on page 68 and clarify what it shows.

Provide clarification whether the 5 year employment land supply is 70ha, or 35ha.

Provide clarification of further employment land allocations in the Perth Core Area when there is a “significant surplus” already identified.

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

The Table at paragraph 5.1.7 is not titled and is totally unclear as to what it is showing, or how it relates to the (again untitled) table on page 62. This table indicates that in order to ensure a 5 year employment land supply a “Total Requirement (ha)” of 70ha is required in Perth – however, it is not clear where this figure has come from as it is not specified in TAYplan. Nevertheless this table identifies an additional land requirement of 26.49ha to achieve a 5 year supply in Perth.

Paragraph 5.1.7 states that a 5 year supply of employment land for the Perth area equates to around 70 hectares. The sentence then goes on to state “*for the period to 2024*”. Assuming the date of adoption of the Local Plan early 2014, this would imply either a supply of 140 ha being required during this period OR that the 5 year employment land supply is 35ha – whilst it would appear to be potentially clarified in the table on page 62, this does need clarification.

The areas identified in the Table on page 68 total some 190ha which, assuming a 5 year supply of 70ha would equate to a 13year supply. If this is the case, it does potentially bring in to question the levels of additional employment land being required through the LDP Strategic Development Areas.

In particular, the reference to E38 Ruthvenfield Road, 25ha general employment use, requires clarification. We cross-reference this with our objection to Housing Site H70 which indicates a further requirement of “*in excess of 25 hectares employment land*” which is not referenced at all on this Table. We therefore question whether this scale of additional employment land is required in the Strategic Development area.

Considering the Employment Land Audit identifies a significant surplus of employment land in the Perth Core Area, and a significant deficit in Perth City, this seems to bring in to question the merit of significant additional employment land allocations in the short term.

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Site ref.	<input type="text"/>	or			
Chapter	Five	Page no.	69	Paragraph no.	5.1.9 to 5.1.11

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.

Update Column A at paragraph 5.1.10 following receipt of the TAYplan Examination Reporters Report, **OR** as set out elsewhere in our objections make an educated estimate as to what that requirement might be, and ensure the LDP delivers it in full.

Remove any allowance for windfall that are not effective within the 5 year plan period from the calculation in arriving at the shortfall to be met.

Increase the figure in Column E accordingly and meet the additional shortfall on H70 in the short term.

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

We object to paragraph 5.1.9. Whilst TAYplan identifies a “build rate” for the Perth area of approximately 510 houses per annum (subject to potential alteration by the Reporters) there is in fact no clarity on what the actual housing land requirement is for each area from TAYplan and therefore Column A in the table below is open for debate and potentially subject to revision upwards.

We object to paragraph 5.1.10. The inclusion of windfall sites in meeting the strategic requirement is contrary to Government Guidance. Planning Advice Note 2/2010 is absolutely clear that windfall sites can only contribute to meeting the strategic requirement once they have been granted planning consent. Having reviewed the most up to date Housing Land Audit, we cannot identify 720 windfall sites which benefit from planning consent and would be considered effective in the 5 year plan period, therefore this figure should be revised and the additional shortfall added to the shortfall Column E.

Taking the above in to account, and assuming no change is made by the Reporters, this would increase the figure “Additional Allocations Required” figure in Column E from 3,340 to approximately 3,800 houses (potentially more if changed by the Reporters) for the Perth Area.

Having reviewed the table at paragraph 5.1.11 (again untitled) we consider that the effect of this change alone would result in the figure at the bottom labelled “Totals” to need to increase to 4,090 and a need to allocate in the region of an additional 500 units, which could be added to H70 Perth West (increasing the short term allocation from 550 to 1,050) for delivery in the short term.

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Site ref.	<input type="text"/>	or			
Chapter	5	Page no.	70	Paragraph no.	5.1.15 to 5.1.17

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.

Consider securing developer contributions towards the Transport Futures measures from a wider catchment than simply development at Perth in this LDP. These measures will have a wider and longer running benefit.

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

Whilst we acknowledge, and broadly support, the package of measures outlined in the Perth Transport Futures document and the benefits they bring in the ability of the Perth area to deliver the TAYplan Strategic Requirements. However, we are keen to highlight, at this stage, that these facilities will benefit not just planned growth in this Local Development Plan or planned growth in TAYplan but will span a much longer period and, in the interest of fairness, the developer contributions should not specifically be focussed on allocated development in this Local Development Plan.

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Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	5	Page no.	71	Paragraph no.	5.1.18 & 5.1.19

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.

Provide capacity information, and scope for improvement through catchment review. Following which, work up Supplementary Guidance.

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

Whilst we acknowledge the School Estate serving Perth is generally limited capacity to immediately support further growth, we would seek clarification as to precisely what the situation is, which schools are likely to be increased, by how much and when to inform timing of development proposals.

We have no issue with contributing to increasing school capacity in line with Council guidance where required and note that within the Strategic Expansion areas, the provision of new primary schools will be required. As set out elsewhere in our representations, we acknowledge this issue and have incorporated an area of mixed use/primary school provision which will be clarified through further investigation and the Master Planning process.

The pending planning appeal (Ref: PPA-340-2065) at Almond Valley Village, which includes a primary school, will also be relevant to this decision making process. If a primary school is to be provided at Almond Valley then the currently proposed mixed use area would revert to employment (mix of uses to be confirmed) rather than primary school.

Further investigations are being carried out in to this and will feed in to a refined Master Plan which will be submitted prior to Examination, if requested by the Council/Reporters.

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	A Ritchie & Son and M & S M Bullough
Address and Postcode	c/o Strutt & Parker LLP (ref: JAW), 28 Melville Street, Edinburgh EH3 7HA
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"/>	Page no. <input type="text" value="45"/> 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.

Support the area identified as Green Belt between Perth & Almondbank.

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

Provides for long term growth of Perth.

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

Name	Robert Evans Esq, Muir Smith Evans for Kinnoull Properties Ltd
Address and Postcode	Muir Smith Evans 10A Alva Street, Edinburgh EH2 4QG
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.	PM1c and RC4	or			
Site ref.	H4	or			
Chapter		Page no.	24, 30 78	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.

We support the identification of site H4 as a housing led mixed used development. The 'H' prefix indicates the site is identified for housing but the wording above the H4 table on page 78 relates to Mixed Use.

We consider that this should be clarified and that the reference is to Housing and Mixed use development. In addition the limit to 300 houses should not be prescriptive until further masterplanning work has been completed.

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

We consider that the limit to 300 units in Proposal H4 is not based on any analysis of density or built form. The policy should recognise that potentially more units could be delivered based on different densities and layouts.

The indicative range of densities set out on page 65 provides a range of typical densities and a typical density figure for different forms of development.

The limit of 300 units for the site which extends to some 10.6ha would represent a medium to high (housing) density site. The plan also suggests that high density (for housing) is of the order of 35 units per hectare and 55 units/hectare appropriate for flatted development.

The number contained within Policy reference H4 should not be prescriptive and requires additional wording..."depending on the form and density of development proposed and a detailed masterplanning exercise"

In addition, both reference to the open space and landscape structure should be indicative.

Reference to a contribution to improving or replacing the footbridge should read "potential contribution" as there is insufficient detail as to the practicalities of such works at this stage.

Policy RC4 should include the potential for developing mixed use commercial centres as part of masterplan proposals. Inclusion of added clarification to Policy RC4 would cover facilities proposed as an integrated part of a mixed use redevelopment that would serve the proposed development site and the surrounding area and be subject of the other key criteria of Policy RC4.

This clarification would also be consistent with Policy PM1C (page 24) is also particularly relevant and supports sustainable new neighbourhoods and local shopping facilities.

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**

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

Mr I. L. STEVEN.

8 WOODLAND COURT,
GOSHEN ROAD,
SCONE, PERTH,
PH2 6LB.

27th February 2012

RECEIVED
29 FEB 2012Local Development Plan Team,
Perth & Kinross Council,
Pillar House
35 Kinnoull Street,
Perth PH1 5GD

Dear Sirs,

I visited your drop-in session in
Scone on 20/2/12 and would comment as follows.PROPOSED NUMBER OF HOUSESWhere are the buyers coming from for all those
houses around Perth, Scone, Almondbank, Bridge
of Earn? They're not all for Housing Association
or the Council and there's little demand
for private ones.CROSS TAY LINK ROAD AND BRIDGE.This road is urgently required and should
be a TRUNK ROAD under the control of
Transport Scotland and it should be at least
a dual carriageway.Your 'developer contribution' model is
totally unsuitable for this road. You say
no houses will be built North of Perth until
this road is built, but no developer is going
to pay towards a road when there is no
demand for his houses.

Also this type of road would not

continued overleaf /

be able to cope with the traffic, especially on days with events on at Scone Racecourse. e.g. Race Days, Concerts, Horse Trials, Game Fairs, Vintage Rallies etc etc, which are increasing every year. There's also a caravan site.

The H.G.V. traffic going through Scone and Perth would mainly use the Link Road to get to the A9 and M90.

So we'll have to wait years and years more ^{for} this badly needed road link, if the model you propose goes ahead.

Yours faithfully,



Your Details

An asterisk (*) indicates a required field.

Your Name: *	<input type="text" value="Mrs M Robertson-Black"/>
Organisation Name:	<input type="text"/>
Agent Name:	<input type="text"/>
Address 1: *	<input type="text" value="130 Stormont Road"/>
Address 2	<input type="text" value="Scone"/>
Address 3	<input type="text"/>
Postcode: *	<input type="text" value="PH2 6PJ"/>
Phone Number:	<input type="text"/>
Email Address: *	<input type="text" value="REDACTED"/>
Site Name:	<input type="text"/>
Contact Person:	<input checked="" type="checkbox"/> Me <input type="checkbox"/> My Agent

Your comments will be applied to the following items:

5 Perth Area Spatial Strategy - 5.33 Scone - Paragraph 5.33.2

Increase in range of Community facilities has not matched the increase in housing in the Balgarvie development.

Style of housing at Balgarvie is not commensurate with the rest of the village and now totally overpowers it.

Future developments should be where there is sufficient existing infrastructure such as the western side of Perth Glasgow, Edinburgh, Dundee and North os Scotland. Also has sufficient retail provision.

5 Perth Area Spatial Strategy - 5.33 Scone - Paragraph 5.33.1

No problem with development at the Glebe School site but preference should be given to catering for the elderly e.g. Care/Residential Home and suitable housing of one and two bedroom for the elderly.

Cross Tay link unlikely to be affordable by Council.

5 Perth Area Spatial Strategy - 5.33 Scone - Paragraph 5.33.3

Any additional housing will have a detrimental impact on air quality and congestion at Bridgend

Cross Tay link likely to have a detrimental impact on the ambience of the area and is also likely to increase traffic using the Dunkeld Road

RDM School already over capacity = who will pay for a new one? Location?

In past 20 years drainage capacity has had to be improved on at least 2 ocassions and may have to be increased again

Part of H29 floods regularly and should not be built on

5 Perth Area Spatial Strategy - 5.33 Scone - Paragraph 5.33.4

Flood plains contained in site H29 - should be kept as such

Village already has a green boundary and this should be retained

Construction at H29 would entail felling of woodland so no enhancement of biodiversity and woodland corridors

Unsuitable access towards A93

There is no provision for safe pedestrian and cycle access to Perth

5 Perth Area Spatial Strategy - 5.33 Scone - Paragraph 5.33.5

Further Supermarket capacity is not desirable as out of town means further increase in traffic and resultant problems

Retail capacity should be easily available for residents who do not have transport

5 Perth Area Spatial Strategy

No further comments apart from the fact that as identified in 2006 this should be removed from the local plan

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

Name	Scotland's Gardens Trust c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place Perth PH1 5NE
Telephone no.	<div style="background-color: black; width: 100px; height: 1.2em;"></div>
Email address	<div style="background-color: black; width: 100px; height: 1.2em;"></div>

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.	<div style="border: 1px solid black; width: 600px; height: 1.2em;"></div>	or			
Site ref.	<div style="border: 1px solid black; width: 600px; height: 1.2em;">MU1</div>	or			
Chapter	<div style="border: 1px solid black; width: 150px; height: 1.2em;"></div>	Page no.	<div style="border: 1px solid black; width: 100px; height: 1.2em;"></div>	Paragraph no.	<div style="border: 1px solid black; width: 150px; height: 1.2em;"></div>

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

This representation is submitted on behalf of Scotland's Garden Trust concerning land at Broxden/Glasgow Road, Perth.

SGT own land and an office building at Cherrybank Gardens, outlined in red on the attached plan.

SGT is pleased to see the land included in the mixed use development reference MU1 Broxden/Glasgow Road, but would like to take this opportunity to make clear several concerns with the proposed allocation.

The details of the allocation MU1 are set out on page 79 of the Proposed Plan. The requirement to develop a master plan for the comprehensive development of the site is welcomed. However, the matter is confused somewhat by page 311 of the Plan which establishes that guidance will be published at a later date by way of a development brief/master plan/development framework.

It is assumed, but not confirmed by the Plan, that the Planning Authority will take the lead in preparing the brief/master plan/framework. The matter is further confused by the lack of a timescale for bringing forward the brief/master plan/framework.

The Local Development Plan should make it absolutely clear who will be responsible for leading the development of the brief/master plan/framework, and the timescale for doing so. Given that there is more than one landowner involved in the allocated area, it is suggested that PKC takes a lead in bringing all parties together in order that a comprehensive masterplan and deliverability of the development is secured.

Whilst SGT is supportive in broad terms of the allocation MU1, and understands that the potential development/landscaping areas highlighted in the Perth Settlement Plan are indicative only, SGT would object strongly to the extent of landscaping shown at Cherrybank, which could compromise the ability to comprehensively master plan the site and deliver the much needed housing Perth requires. This is a prime development site that can deliver family housing in a high quality environment with excellent public transport links to Perth Town Centre and beyond.

Therefore SGT expects to be involved in the production of the required brief/master plan/framework that will guide the comprehensive development of the area.

Save a copy

Print

Submit

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

Name	Athel Price, Bolfracks Estate c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place Perth PH1 5NE
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: ☐

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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.	H37	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 include the reason for supporting the Plan/requesting a change.

Bolfracks Estate as the site owner welcomes the proposed allocation of site H37, Land south of Kenmore Road, Aberfeldy as set out on pages 159 and 160 of the Proposed Plan. The site can be released for development within the timescales set out in the Proposed Plan.

The strategy of making larger housing allocations to Aberfeldy is clearly set out in the TAYplan (Proposed). As such this allocation is in accordance with TAYplan. Within Highland Perthshire topographical and other challenges place an emphasis on maximising suitable allocations.

Allocation of site H37 makes a logical expansion to the west of Aberfeldy, consolidating recent development at Duntaylor and providing an outstanding opportunity for a 'gateway' development at the western entrance to the town. Furthermore, the site lies within a 5-10 minute walk of the Town Centre and facilities on offer there and within 400 metres or a 5 minute walk from the newly expanded school. The site also lies on the local bus route with opportunities to connect the site to the local bus service. As such an emphasis is placed on opportunities for more sustainable travel patterns and the allocation of the site complies with policy set out in 'Designing Streets'.

The strategy of consolidating employment land at the eastern side of the town is also supported.

Access to the site can be provided from Kenmore Road, making sure that access to Duntuim Farm is maintained. The existing landscape framework including mature trees and dry stane dyking provides an opportunity to be incorporated into the development, reflecting the character of the area. Supplementary planting will consolidate the landscape fit of development on the site and create opportunities for habitat creation and enhanced biodiversity.

The site meets the tests of effectiveness as set out in PAN 2/2010 in that:

- The site is in the hands of an owner who can release the land for development, and it can be developed within the plan period. Housing is the sole preferred use of the site.
- The site is free from constraints such as aspect, topography, flooding, ground stability and access, and is free from contaminants
- No public funding is required to open the site for development and any infrastructure required can be reasonably provided.

The site can make a significant and telling contribution to the supply of much needed housing in Aberfeldy and Highland Perthshire. Therefore Bolfracks Estate supports the allocation of site H37 in the Perth and Kinross Local Development Plan.

Save a copy

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

Name	Michal Wojtowicz c/o Bidwells (per Steven Cooper)
Address and Postcode	Bidwells, 5 Atholl Place, Perth, PH1 5NE
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: ☐

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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.	Blairgowrie Settlement Plan	or
Chapter	<input type="text"/>	Page no. <input type="text" value="285"/> 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.

Land at Belfield, Woodlands Road, Blairgowrie should be identified as 'Residential Area' not 'Open Space'.
Attached plan illustrates the area that should be identified as 'White Land'.

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

Please see attached form for details

Save a copy

Print

Submit

Proposed Local Development Plan response – Mr M Wojtowicz
Blairgowrie Settlement Plan – page 285

This representation is submitted on behalf of Mr Michal Wojtowicz, of Belfield, Woodlands Road, Blairgowrie. The representation seeks a change to the Blairgowrie Settlement Plan on page 285 which shows land within Mr Wojtowicz's ownership also largely within the curtilage of his house, as being within the Blairgowrie Settlement and also part of a wider area of Open Space. It is considered that these areas (please see attached Plan) should be identified as 'White Land' within a residential area.

The attached Plan illustrates the area of land subject of this representation. Area A is within the curtilage of the house and Area B is essentially an infill area between Belfield and The Struan. The following paragraphs will justify the proposed change.

Area A

As mentioned above, this area lies within the private curtilage of the residential property Belfield, at Rosemount, Blairgowrie. It has had a functional relationship with the house since the house was built in 1911. Mr Wojtowicz objects to the 'Open Space' designation on this area of land as shown on p285 of the Proposed Plan.

Policy CF1 sets out a framework for protecting and enhancing open space, parks and sports pitches. The pre-ambles to the Policy states that Community sport and recreation facilities contribute to the cultural identity of the area offering opportunities for a wide range of social interaction and are important to local identity.

It is apparent from both the pre-ambles to the Policy and the Policy text itself that the areas of land identified as 'Open Space' have significant value for community and/or recreational use.

Scottish Government Policy on Open Space and Physical Activity is set out in detail in paragraphs 151-155 of the consolidated Scottish Planning Policy. There is an emphasis on protecting functional open space. Local Authorities are encouraged to prepare Open Space Audits, taking account of the quality, community value, accessibility and use of existing open space. The Audit should be used to inform a Strategy which in turn provides a base for the Local Development Plan.

Area A is a private orchard within the curtilage of Belfield. This area is private garden ground. It is not used as a community sports or recreation facility, in fact it has no community use at all. The wider area of open space at Rosemount includes playing fields and a livery yard which are accessible by the public and have wider community use. The land at Belfield Area A is only accessible from within the curtilage of Belfield and is not linked in any way to the wider area of open space. It is therefore difficult to understand the wider benefit that is achieved by allocating the land as 'Open Space' when the area does not meet any of the criteria or contribute to the objectives of the Policy.

It is therefore suggested that the logical alternative would be to remove the 'Open Space' designation from Area A, and leaving it as 'White Land' and therefore covered by Policy RD1 - Residential Areas. Policy RD1 seeks to protect and if possible improve residential amenity. Policy RD1 also has a number of criteria that when applied would protect the wider area from inappropriate development. It is therefore considered that Policy RD1 is more appropriate for an area of private curtilage.

Area B

Area B is a grassed paddock to the immediate north of the functional garden ground of Belfield. Whilst this parcel of land does not have the same function as Area A as garden ground to Belfield, it is nonetheless private ground and to all intents and purposes this land is within the curtilage of the house. Area B has also been included within the wider Rosemount

Open Space designation as shown on the Blairgowrie Settlement Map on page 285 of the Proposed Plan.

Area B lies between Belfield and The Struan and is bounded by Woodlands Road to the east. There is an existing access from Woodlands Road.

Mr Wojtovicz objects to this area being included within the Rosemount Open Space and seeks a change to the Plan to have this area identified as 'White Land' within a residential area.

As described above, the general purpose for the Open Space Policy CF1 is to identify functional space with wider community value and recreation.

There is no public access to Area B. Although it has an existing access from Woodlands Road there is no access from there to the wider area of Rosemount Open Space. Therefore its value as a community facility or a recreational facility is non-existent. Furthermore it has limited biodiversity/habitat value.

The site is a logical infill site between existing residential properties and offers an opportunity for limited small scale development.

Were an application for development of the site to be submitted and assessed against Policy CF1 there would be a very strong case to support development as it is considered that such development would affect only a very minor part of the Rosemount Open Space area and would not affect its continued use as an open space resource. Therefore a proposal would comply with part B of Policy CF1 and therefore approval could be justified.

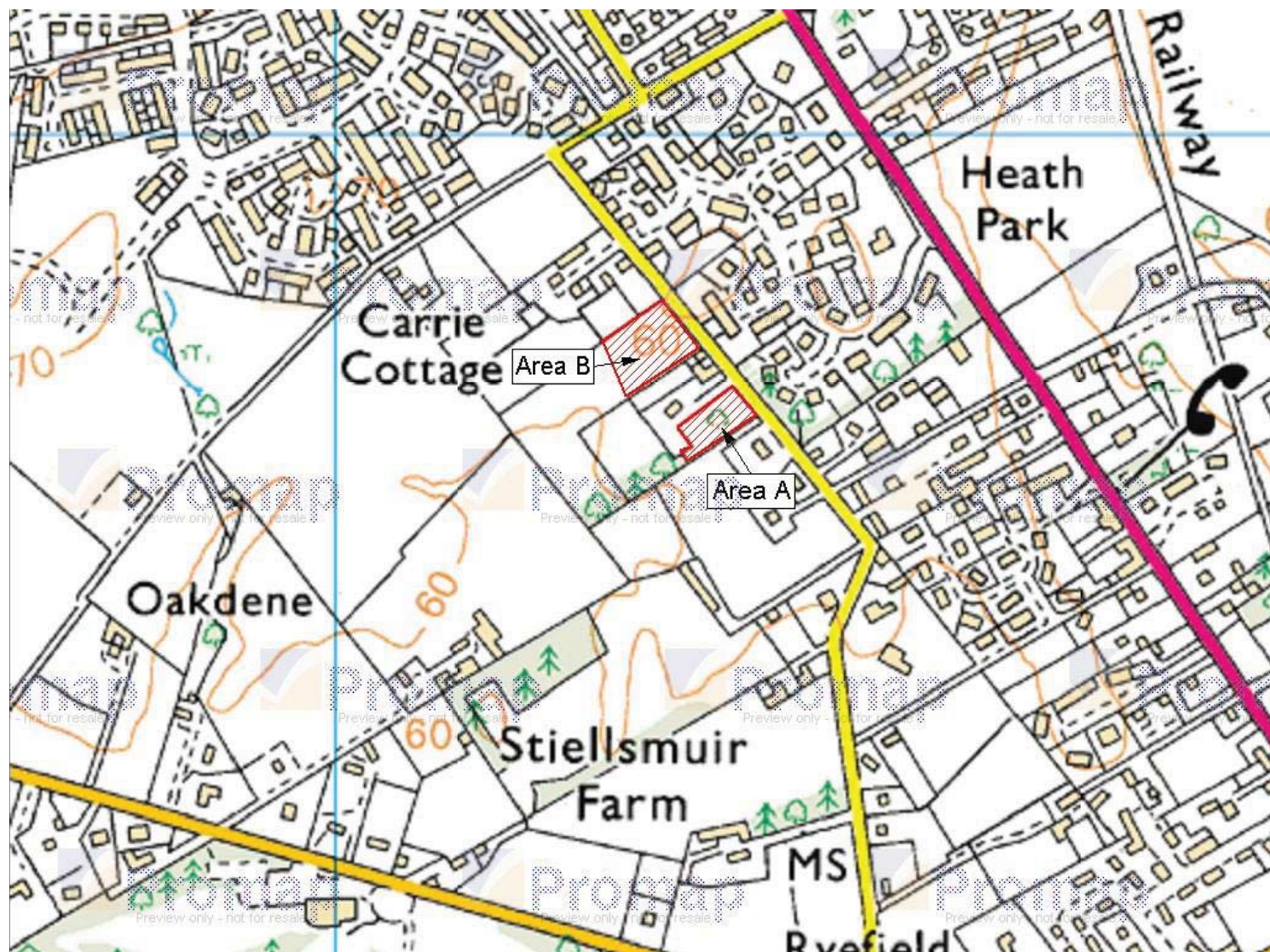
In such circumstances the inclusion of Area B within the Rosemount Open Space area does not meet the aims and objectives of Policy CF1 and a more logical solution would be to include the site within the 'White Land' of the residential area. In which case Policy RD1 would be applicable to the site and would provide an appropriate framework for assessing future applications.

Summary

This representation seeks a change to the Proposed Plan in respect of land at Belfield, Woodlands Road, Rosemount, Blairgowrie. The proposed change is to remove the Open Space designation from two areas of land illustrated on the attached plan and have them identified as 'White Land' within a residential area.

This representation has outlined sound reasoning for this change which would be in accordance with Scottish Government Policy set out in the SPP and the aims and objectives of the Proposed Plan.

Perth and Kinross Proposed Local Development Plan Consultation
Response by Michal Wojtowicz
Land at Belfield, Blairgowrie



Area A – Private garden ground within curtilage of Belfield. Change sought from 'Open Space' to 'Residential'

Area B – Private land owned by Mr Wojtowicz. Change sought from 'Open Space' to 'Residential'. Opportunity site for infill development of 1 – 2 plots.

BIDWELLS

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

Name	Peter McRobbie c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place Perth PH1 5NE
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="6"/>	Page no.	<input type="text" value="152"/>	Paragraph no.	<input type="text" value="6.1.10"/>

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.

Objects to over allocation of windfall and small sites in meeting the housing land supply within Highland Housing Market Area

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

Please see attached sheet

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1.0 Introduction

- 1.1 This objection is submitted on behalf of Peter McRobbie of Balnacree Farm Cottage, Donavourd.
- 1.2 The objection is in respect of the allocation of housing land within the Highland Perthshire Housing Market Area and in particular to the over-reliance on housing land from small and windfall sites, and the non-allocation of land at Donavourd, Pitlochry.

2.0 Housing Land Supply – Windfall/Small Sites Over Supply

- 2.1 The housing strategy for the Highland Area is set out on page 152 of the Proposed Plan. This sets out a housing requirement of 1120 houses.
- 2.2 With 100 completions in 2010-2011 and an effective supply of 190 there is effectively a requirement to find land for 830 houses in the new Plan.
- 2.3 The proposed strategy is to allow for 110 houses to come from windfall sites (10%) and 170 from small sites (15%). Whilst historically a high proportion of completions have come from such sites, my client feels it is unwise and contrary to Scottish Government Policy to continue to rely on windfall and small sites when opportunities exist to allocate suitable land for development.
- 2.4 Scottish Government Policy is set out clearly in the Consolidated Scottish Planning Policy (SPP). Paragraph 68 clarifies the role of the planning system in identifying a generous supply of land for housing. Paragraph 74 makes it clear that "Planning authorities should ensure that sufficient land is available to meet the housing requirement for each housing market area in full". Therefore it is considered that the Plan should seek to allocate suitable sites where identified.
- 2.5 The strategy set out in the Proposed Plan assumes 25% of the housing requirement will come forward as small or windfall sites. In so doing my client believes that the Proposed Plan does not allocate a generous supply of housing land, nor does it ensure that sufficient land is available to meet the housing requirement. Furthermore, and of particular concern is that such an over-reliance on unplanned development encourages unsustainable settlement patterns. Therefore the strategy for housing land in Highland Perthshire as set out in the Proposed Plan is contrary to Policy set out in the SPP.

3.0 Non-Inclusion of land at Donavourd

- 3.1 My client therefore proposes a change to the Plan to include the allocation of land at Donavourd, Pitlochry for development.
- 3.2 The site and its location are highlighted on the attached plan. The site extends to some 1.65ha. The proposed development would allow 5/6 generous house plots on the lower and flatter areas of land. The more undulating land in the centre would continue to be used for hay cropping or can be designated as open space. Finally a new green corridor will be created on the eastern boundary linking the existing woodland to the south, to the existing wetland to the north. There are also opportunities to connect the development site to the wider network of footpaths in the area.

- 3.3 There are three potential access points within my client's control as shown on the attached plan.
- 3.4 Donavourd is a logical location for development of this small scale. The site is in close proximity to Pitlochry and the services on offer there and is also served by the local bus route. Accordingly small scale development would meet with the objectives of a sustainable settlement strategy.
- 3.5 The site is effective in accordance with PAN 2/2010 in that:
- It is within the ownership of a single party and can be released for development immediately
 - The site is free from constraints related to slope, aspect, flood risk, ground stability, access and contamination
 - The site can be developed in the Plan Period
 - No public funding is necessary to allow development
 - The site is free of infrastructure constraints and housing is the sole preferred use.
- 3.6 In landscape and visual terms the site is well screened from the A9 and wider surroundings by existing tree cover and as such small scale low density development would be seen in context of the similar development which surrounds the site to the east and west and extends to the north, and would not appear obtrusive or incongruous in the wider landscape.
- 3.7 It therefore follows that the site is suitable for development. This is confirmed in the Environmental Report carried out by PKC in 2010 which has assessed the site and highlights it as having development potential – see attachment.

4.0 Conclusion

- 4.1 My client has concerns that the housing strategy places an over reliance on small and windfall development. Relying on such unplanned development encourages unsustainable settlement patterns and is contrary to Scottish Government Policy.
- 4.2 Therefore a change to the Plan is proposed to include the allocation of land at Donavourd for 5-6 house plots. The site has been assessed in the 2000 Environmental Report and its development potential highlighted. It is free from environmental constraint and meets the terms of effectiveness. Allocation of the site is in accordance with Scottish Government Policy to allocate generous land supply sustainable settlement patterns and will contribute to the delivery of the housing requirement for Highland Perthshire.

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	Zurich Assurance Ltd c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place, Perth, PH1 5NE
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: ☐

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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.	Bankfoot Settlement	or
Chapter	<input type="text"/>	Page no. 92-93 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.

Objection the non-inclusion of land at Highfield Place/Churchfield, Bankfoot

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

Please see attached form.

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Perth & Kinross Council – Proposed Local Development Plan Consultation Response

Zurich Assurance Ltd

10 April 2012



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1	Introduction	1
2	National Planning Policy and Deliverability	1
3	Land at Bankfoot.....	3
4	Conclusion	4

1 Introduction

- 1.1 This representation is submitted on behalf of Zurich Assurance Ltd (ZAL) in respect of the non-inclusion of land at Highfield Place/Churchfield, Bankfoot as a housing allocation in the Proposed Local Development Plan.
- 1.2 ZAL has major concerns with the housing strategy set out in the Proposed Plan. In accordance with TAYplan, development is focussed within the Perth Core. ZAL has no objection to this strategy. However, two thirds of the proposed allocations are constrained by major infrastructure delivery that is required in advance of the proposed housing development. Therefore there is a high possibility that the allocated numbers cannot be delivered within the specified period.
- 1.3 ZAL therefore seeks reallocation of land within the Perth Housing Market Area.

2 National Planning Policy and Deliverability

- 2.1 Paragraph 71 of the SPP encourages the provision of a generous supply of land, and paragraph 72 makes clear that a "minimum five year effective land supply" must be maintained "at all times".
- 2.2 Paragraphs 77 and 80 emphasise the importance of include deliverability, whether the development can be achieved within required timescales, accessibility and co-ordination of land release with investment in infrastructure.
- 2.3 Table 1 illustrates the proposed housing allocations within the Perth Core Area to 2024 and beyond, and highlights the number of units that are constrained and cannot be delivered until new infrastructure is in place.

Table 1 – Perth Core allocations and 'constrained sites'

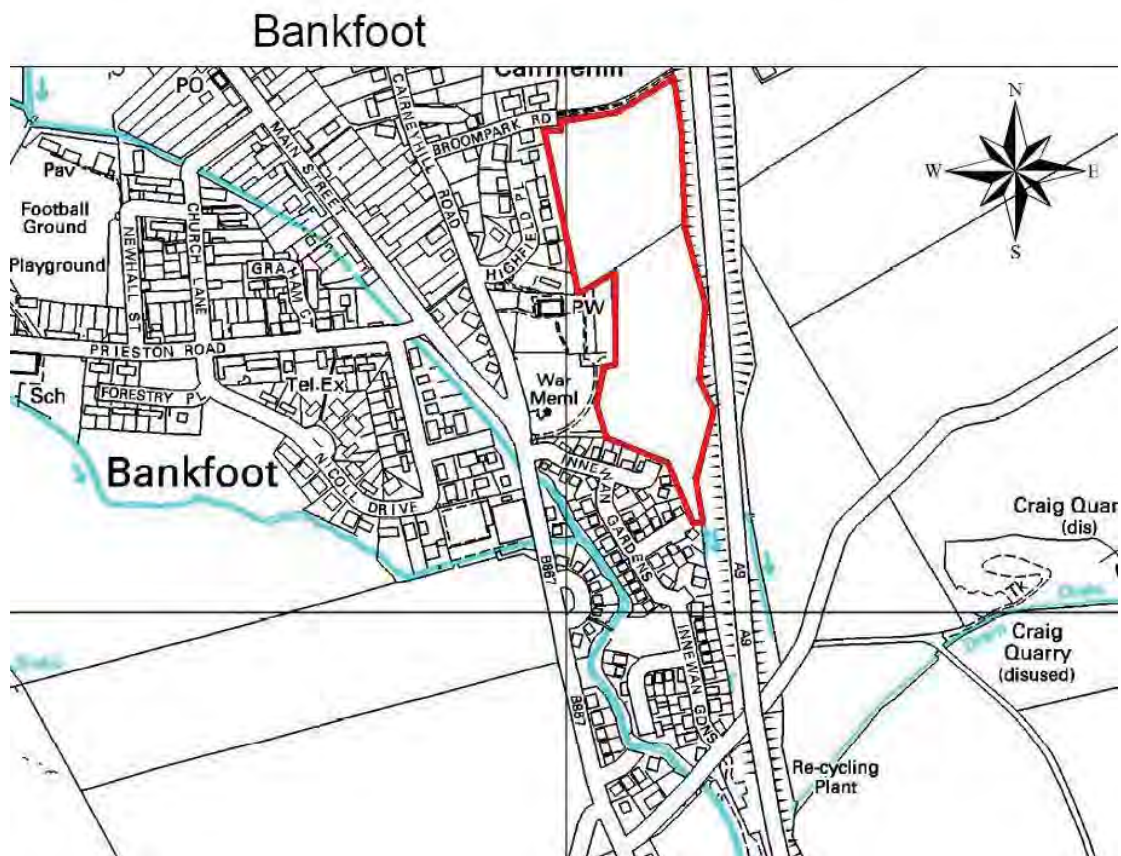
Perth Core Sites	to 2024	Beyond 2024	Constrained (2024)
Balbeggie	100	-	90
Bertha Park	750	2,500	750
Bridge of Earn	100	-	-
Oudenarde	-	Additional 400	-
Luncarty	200	200+	125
Methven	105	-	-

Perth Core Sites	to 2024	Beyond 2024	Constrained (2024)
Perth Airport	50	-	40
Perth sites	620	-	-
Perth West	550	2,500	550
Scone	450	350	350
Stanley	180	120	-
Total	3105	6070	1905

- 2.4 It is therefore a significant concern that 1,905 of the 3,105 houses allocated for the Perth Core to 2024 are constrained until major new transport infrastructure can be delivered.
- 2.5 1,355 houses are constrained by the Cross Tay Link Road (CTLR). CTLR is not a committed project in the sense that:
- there is no funding in place
 - the final route has not been agreed
 - land assembly is an outstanding issue
 - no detailed design work has been undertaken therefore no public consultation has taken place on it
 - Transport Scotland have not given any approval for CTLR and have raised doubts about the proposed CTLR corridor
 - Re-alignment of the A9 will be required
 - the road and associated bridge(s) have still to obtain planning consent and it is certain a Public Inquiry will have to be held before it can be considered 'committed'.
- 2.6 The Draft Action Plan has a CTLR delivery timescale of 2020 and a start date of 2018 has been mooted by Perth and Kinross Council. Given the outstanding work to be undertaken on the project and the extreme difficulties and challenges that will be faced in completing those tasks the indicated timescales are considered unrealistic based on the timescales historically involved in major transport projects. Therefore the deliverability of housing land allocations at Scone, Luncarty, Bertha Park, Balbeggie and Perth Airport for the period to 2024 is completely unreliable.

3 Land at Bankfoot

3.1 ZAL owns land at Highfield Place/Churchfield, Bankfoot (see below).



3.2 ZAL has instructed WSP road engineers to assess access opportunities. I attach a copy of their appraisal and a layout plan which shows that development is feasible and an access can be achieved in accordance with the Council's requirements.

3.3 Bankfoot is a logical location for development. It has excellent connection to the A9 and is only seven miles north of Perth. It lies just out with the Perth Core Area.

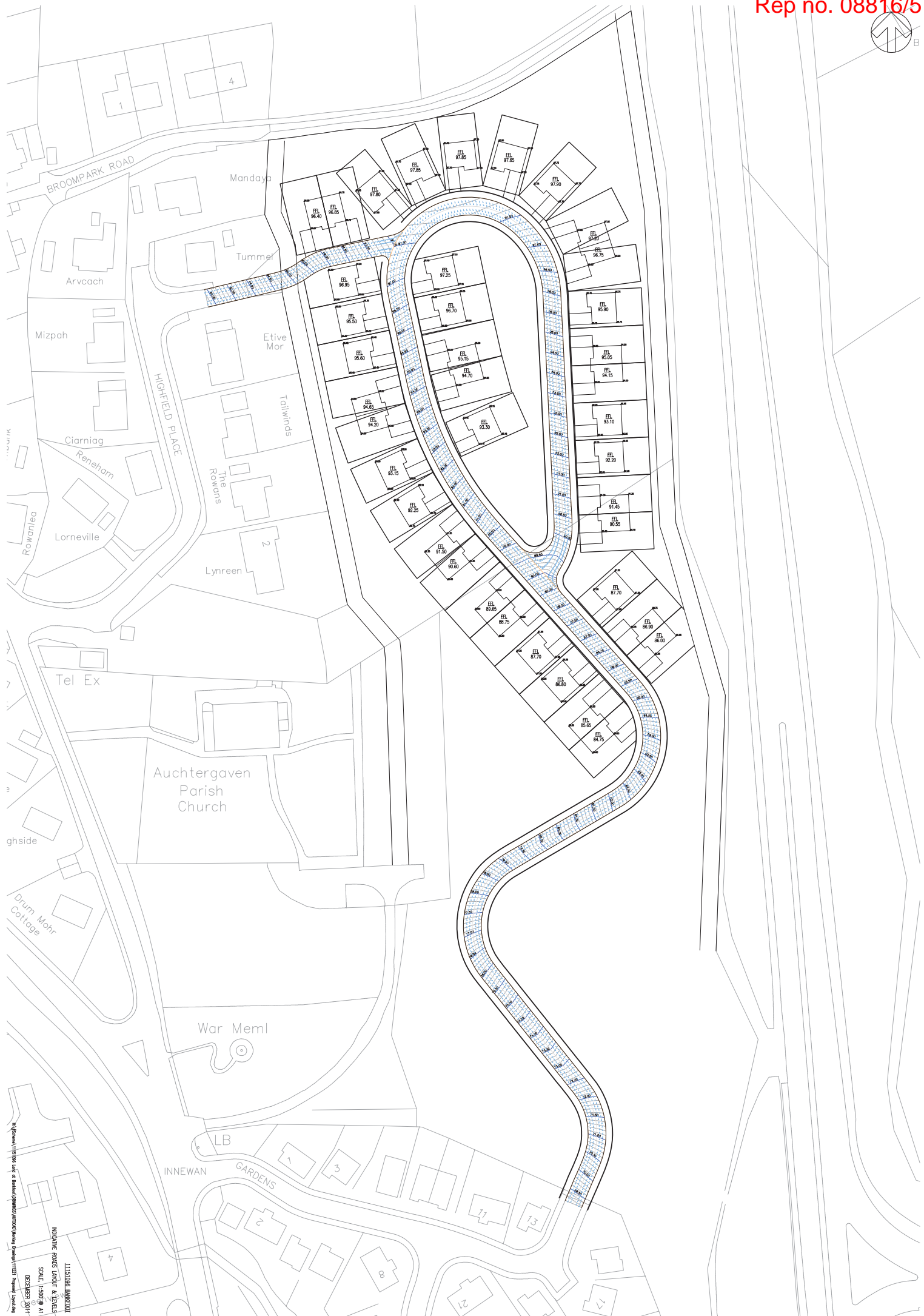
- 3.4 The site provides a solution to accommodate some growth in Bankfoot which would be important in sustaining village amenities such as the village shop. Page 92 of the Proposed Plan highlights flooding and accessibility as key constraints to the expansion of Bankfoot. The site is free from such constraints. The scale of development proposed does not place undue constraint on the public sewerage system or the capacity of the primary school.
- 3.5 The site meets the tests of effectiveness as set out in PAN 2/2010 in that:
- The site is in the hands of an owner who can release the land for development, and it can be developed within the plan period. Housing is the sole preferred use of the site.
 - The site is free from constraints such as aspect, topography, flooding, ground stability and access, and is free from contaminants
 - No public funding is required to open the site for development and any infrastructure required can be reasonably provided.
- 3.6 The attached layout prepared by WSP indicates that the site is capable of accommodating in the region of 39 houses. Landscape fit is a key consideration and it is proposed that the site be allocated for 30 houses subject to a masterplan process to ensure integration and connection to the existing settlement and minimise any landscape and visual impact of new development.
- 3.7 ZAL has significant concern over the deliverability of Cross Tay Link Road in advance of 2020. The implications of any delay means delays to the delivery of two thirds of the Perth Core allocations.

4 Conclusion

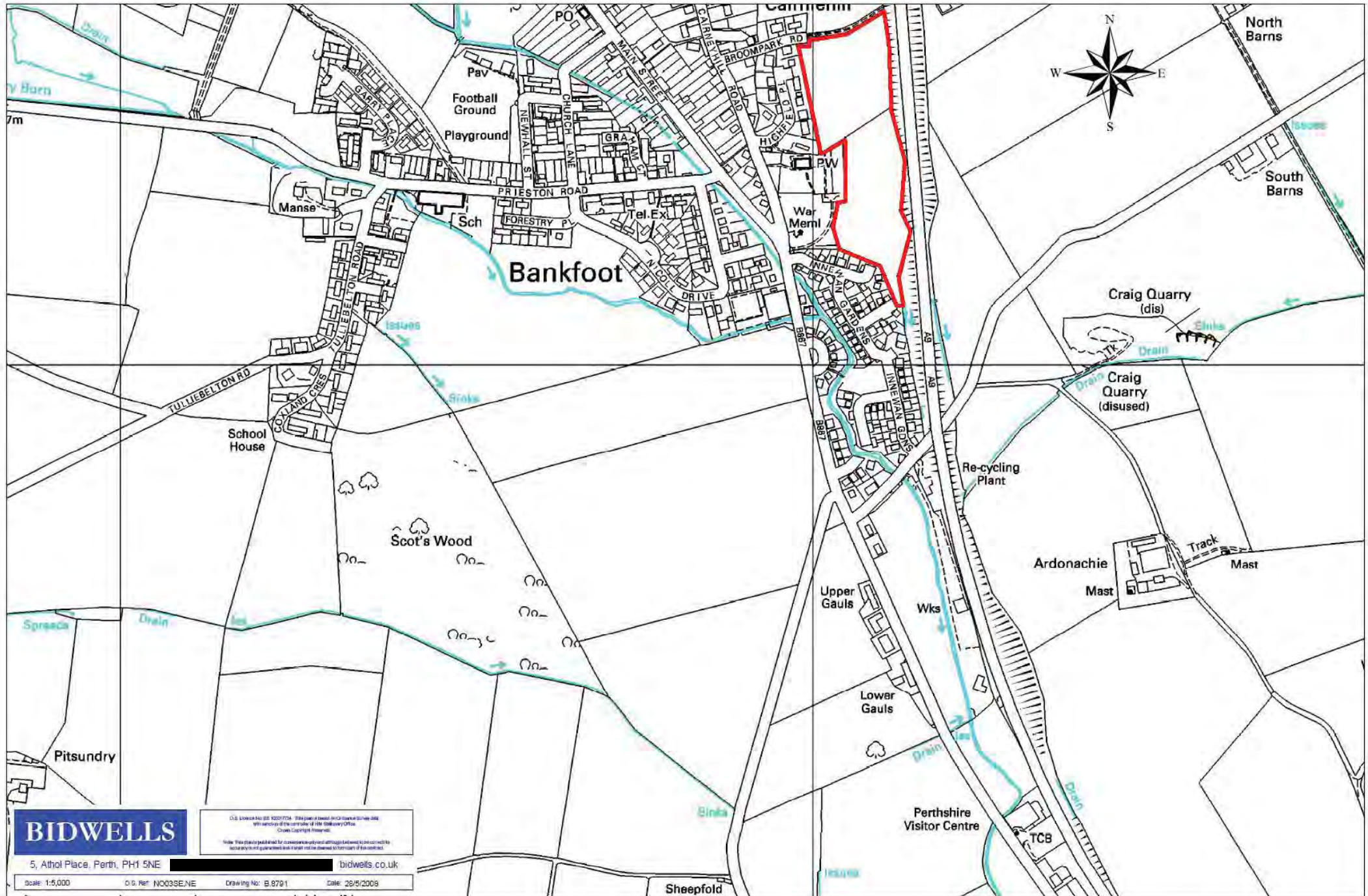
- 4.1 Scottish Planning Policy clearly requires that the Perth and Kinross Local Development Plan allocates and maintains a minimum 5 year supply of effective land at all times. As CTRLR is considered unlikely to be in place by 2020 at the very earliest, and there are significant obstacles to overcome to implement suitable multiple access points to Perth West, two thirds of the housing allocations cannot be considered effective and is unlikely to deliver any housing until after 2020.
- 4.2 Therefore ZAL urges PKC to reconsider the initial housing allocations with the Perth Housing Market Area for the period to 2024. In accordance with Scottish Government Policy the new LDP has to allocate an effective land supply and must be generous enough to allow flexibility in the event of difficulties with delivery.

- 4.3 Therefore ZAL requests the initial allocation of 30 houses at the Highfield Place/Churchfield site is included in the Local Development Plan as just one option to ensure development can take place within the Perth HMA in the initial plan period. The site is free from constraints, is fully effective and can make an early contribution to the supply of much needed housing. Above all, the development is deliverable within the required timescales. It would therefore be logical to include the allocation as suggested

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.



Bankfoot



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5, Athol Place, Perth, PH1 5NE

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Scale: 1:5,000

O.S. Ref: NO03SE/NE

Drawing No: B 8781

Date: 28/5/2009

Sheepfold

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	Steven Cooper
Address and Postcode	Bidwells, 5 Atholl Place, Perth, PH1 5NE
Telephone no.	[REDACTED]
Email address	[REDACTED]

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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.	H44 and H45	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.

The housing allocations at Murthly H44 and H45 are welcomed by Murthly and Strathbraan Estates objects to and seeks a change to the boundaries of both sites.

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

Please see attached sheet for details.

Save a copy

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Perth & Kinross Council – Proposed Local Development Plan Consultation Response

Murthly & Strathbraan Estates

10 April 2012



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1	Introduction	1
2	National Policy, Effectiveness and Deliverability	1
3	Murthly site H44	2
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1 Introduction

- 1.1 This representation is submitted on behalf of Murthly and Strathbraan Estates and seeks changes to the site boundaries of allocations H44 and H45 as set out on page 193 of the Proposed Plan.
- 1.2 Murthly has grown over recent years with development at Druid's Park and Kinclaven Road. The new development has brought a vitality to the village evidenced by improvements to the village store and the recent planning approval for a village pub/restaurant.
- 1.3 Murthly lies on the cusp of the Perth Housing Market Area and the Highland Perthshire Housing Market Area. The recent expansion of the village is evidence of the popularity of Murthly as a place to live. With good links to the A9(T) and surrounding towns and villages such as Birnam and Dunkeld, Stanley, Coupar Angus and Blairgowrie, Murthly is a logical location for further development.

2 National Policy, Effectiveness and Deliverability

- 2.1 The Estate welcomes the allocation of sites H44 and H45 and the idea of focusing development close to the village hall and proposed pub/restaurant, thereby consolidating the village centre.
- 2.2 The village shop, hall, proposed pub and sites H44 and H45 are within 400 metres/five minute walking distance of the "village centre". Allocation of these sites complies with the principles of Scottish Government Policy set out in 'Designing Streets'.
- 2.3 The sites meet the tests of effectiveness as set out in PAN 2/2010 in that:
 - They are in the hands of an owner who can release the land for development, and it can be developed within the plan period. Housing is the sole preferred use of the site.
 - The sites are free from constraints such as aspect, topography, flooding, ground stability and access, and are free from contaminants
 - No public funding is required to open the site for development and any infrastructure required can be reasonably provided.
- 2.4 Whilst the Estate welcomes the allocation of sites H44 and H45, the boundaries illustrated on page 193 are too tight and constrain opportunities to provide a new village green and to enhance the environment of the village centre.
- 2.5 Murthly Estate is in advanced negotiations with A&J Stephen to secure a position to develop the sites. A&J Stephen have an excellent track record in delivering quality housing in Highland Perthshire, including a recent development at Kinclaven Road, Murthly.

3 **Murthly site H44**

- 3.1 The Estate welcomes the allocation of this site as a logical extension for the village for 20 houses. However, a change is sought to the southern boundary of the site.
- 3.2 The southern boundary indicated in the Proposed Plan follows an arbitrary line that does not relate to any existing landscape features, and the Estate is concerned that it does not make for efficient use of otherwise developable land. There is a danger that the boundary being so tightly drawn could threaten the delivery of the allocated 20 houses.
- 3.3 The Estate proposes that the site boundary should be amended as per the attached plan, using the existing ridge as a natural edge to the settlement. Implementation of a scheme of landscaping will provide an enhanced settlement boundary.
- 3.4 The proposed change will ensure that the allocated 20 houses can be delivered in a manner that respects the built form and density of the surrounding area and provides an opportunity for an enhanced landscaped southern edge to the village.

4 **Murthly site H45**

- 4.1 The allocation of the site and principle of road frontage development is welcomed. The village hall lies to the east of the site with the new pub/restaurant to the south east. With these facilities in such close proximity there is an opportunity to use the southern part of site H45 to create a new village green/park and formalise and consolidate the village centre. The attached plan illustrates the proposal.
- 4.2 The concept of creating a new village green and a 'village centre' will greatly enhance the environmental quality of the area and create a greater sense of place, in accordance with Scottish Government Policy set out in 'Designing Streets' and the consolidated SPP.
- 4.3 The introduction of a village green/park would also provide an opportunity to reduce the speed limit and dominance of traffic on the B9099 Caputh Road, which is known to be an issue of concern for residents.
- 4.4 Taking account of longer term housing needs the site offers great potential for expansion to the west in future years and the western boundary should take cognisance of this.
- 4.5 Murthly and Strathbraan Estate therefore seeks a change to the western boundary of site H45 as illustrated on the attached plan.

5 Conclusion

- 5.1 Murthly and Strathbraan Estate urges Perth and Kinross Council to support this opportunity to enhance the village environment and formally establish a village centre by amending the southern boundary of sites H44 and 45 as suggested, and the clear environmental benefit these changes would have.

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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Name	Zurich Assurance Ltd c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place Perth PH1 5NE
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

Policy ref.	<input type="text"/>	or
Site ref.	Scone North H29	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.

No objection to identification of site but objects to house numbers allocated in first phase and seeks reallocation to other settlements such as Stanley.

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

Please see attached document

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Perth & Kinross Council – Proposed Local Development Plan Consultation Response

Zurich Assurance Ltd - Scone North Ref H29

10 April 2012



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1	Introduction	1
2	Scone North Landscape Issues	1
3	Scone North Access Constraints	2
4	National Planning Policy - Deliverability	3
5	Conclusion	4

1 Introduction

- 1.1 This representation is submitted on behalf of Zurich Assurance Ltd (ZAL) in respect of site H29 Scone North. The Proposed Plan allocates a total of 700 houses to Scone North with 350 to 2024 and an additional 350 for the period beyond 2024. ZAL does not object to the identification of the site as a long term housing allocation. However, it is quite clear that delivery of Scone North is largely dependant on the completion of the Cross Tay Link Road (CTLR). Part of the allocation also lies within the Scone Palace Designed Landscape.
- 1.2 Therefore ZAL has concerns about delivery of the Scone North development within the timescales required. ZAL therefore seeks re-allocation of housing land from Scone North to Stanley and possibly other settlements with the Perth Housing Market Area in the initial period to 2024. The proposed development at Stanley is not reliant on significant up front public investment and infrastructure provision. It is therefore logical to maximise the allocation of housing to Stanley to 2024 and beyond.

2 Scone North Landscape Issues

- 2.1 Scone North is a large 63 ha site situated on the northern edge of Scone. It is made up of two land parcels separated by a substantial belt of forestry plantation woodland.
- 2.2 Each land parcel is subdivided by field boundaries made up of hedgerows. An extensive forestry plantation provides a substantial backdrop to all of the H29 allocation. It is unknown at the time of writing what the felling and re-stocking programme is for this plantation but should it be removed as part of a felling programme then plainly this backdrop and setting for future development would be lost.
- 2.3 The eastern parcel occupies high ground up to 110m AOD with open slopes running south-easterly down to the A94. This area of land is very open and exposed and lies on a shoulder which rises above the current northern boundary of Scone. As a result it is open to long views from the A94 and from properties and small communities to the higher ground to the east such as Murrayshall, Corsiehill and Muirhall. New development would be highly visible from the A94 notably for road users travelling south from Scone Airport direction.
- 2.4 The western parcel lies on south-westerly facing ground above the northern edge of Scone. It is potentially less open to long views to the east and would be less visible form users of the A94. This parcel of land does however lie within the Planned Estate of Scone Palace and is therefore sensitive to new development with regard to potential impacts on the estate.

- 2.5 If the full extent of land identified within H29 is built out then there is a long term risk of visual coalescence between Scone and the development at Perth Airport.

3 **Scone North Access Constraints**

- 3.1 Whilst these landscaping issues give cause for concern, the major constraint to the delivery of the housing allocation to Scone North and in particular the delivery of 350 houses to 2024 is the inextricable link between delivery of CTRLR in advance of the delivery of housing.
- 3.2 Page 141 of the Proposed Plan clearly states "the Cross Tay Link Road is required before development can proceed" and the reason being "to prevent the reduction in air quality and increased congestion in the Bridgend area of Perth". Additionally the plan puts in place an embargo on planning consents for Greenfield sites with 10 or more houses until CTRLR is constructed.
- 3.3 The purpose of CTRLR is to relieve traffic congestion in the Centre of Perth, particularly at Bridgend where traffic heading north towards Blairgowrie and Coupar Angus meets traffic heading in the opposite direction at traffic lights at Perth Bridge (Smeaton's Bridge). Latest figures from 2010 indicate that CTRLR will remove just 200 and 90 vehicles from Perth Bridge in AM (0700 – 0900 hrs) and PM (1600 - 1800 hrs) peak times. It is understood that these figures do not include traffic projected from proposed developments east of the River Tay at Scone, Balbeggie, Perth Airport and Burrelton and are a comparison between the existing road network and impact if CTRLR were in place. This relates to a reduction of 0.75 vehicles per minute of the AM peak and 1.67 vehicles per minute of the PM peak from Perth Bridge and the Bridgend area. This is not considered to be a significant reduction and is unlikely to make significant improvements to air quality. Paragraph 16.2.2 of the Perth Traffic and Transport Issues Transport Appraisal 2010 makes it clear that the scale of new development and CTRLR will result in overall increases in vehicle emissions and that only improvements in vehicle design and operation will contribute to improvements in air quality. This must surely bring into question the fundamental suitability of CTRLR and the Scone North site.
- 3.4 Cross Tay Link Road is supported by the Proposed Plan and TAYplan. However it is some way short of being considered a committed project.
- 3.5 Significant public funding will be required to fund the CTRLR. There is no committed public funding in place from any public body. The indicative costing of £91.2 million for CTRLR (In 2008 prices) is considered to be underestimated given the significant challenges posed by the CTRLR proposed route as will become clear below.
- 3.6 The final route for CTRLR has not been agreed. In fact the route shown in the Proposed Plan conflicts with the area of search indicated in the Main Issues Report.

- 3.7 No detailed design work has yet been undertaken for the proposed new road and bridge(s). The corridor shown crosses the River Tay at a point where the River Tay is in very close proximity to the Perth – Inverness railway line and the A9. It is considered highly unlikely that there is enough room to provide a junction that will link the new road to and from the southbound A9 in compliance with the minimum design standards set down in the Design Manual for Roads and Bridges, without significant re-alignment of the A9. For CTRL to accomplish the purpose it is supposed to serve it is fundamentally important that a link to and from the A9 can be secured and from the Proposed Route indicated it is considered a major risk that this cannot be achieved.
- 3.8 Transport Scotland has not given any approval for CTRL and on the basis of the above are likely to have strong reservations over the proposal.
- 3.9 Compulsory Purchase Orders are likely to be required to assemble the land required to construct CTRL which in itself will be a lengthy process.
- 3.10 Finally, the road and associated bridge(s) have still to obtain planning consent and it is certain a Public Inquiry will have to be held.
- 3.11 Therefore it is considered that there are major obstacles to overcome before CTRL can be considered as a committed project, far less reach completion.
- 3.12 Whether CTRL will reduce congestion remains up for debate – the shortest route into Perth is still via Bridgend which is where the current congestion issue lies. The Council need to focus on developing measures and encouraging a switch to other modes for trips into the City Centre.
- 3.13 The current park and ride facility (adjacent to the proposed supermarket site) which is to be extended needs to be attractive to encourage people to switch from their cars to the bus. This may include more demand management (bus priority, parking controls, etc) measures on the A94 and in the City Centre.
- 3.14 The Draft Action Plan indicates a timescale of 2020 for implementation of CTRL. Given the implications of the above it is considered that 2022-2025 is a more realistic timescale.
- 3.15 ZAL does not object to the principle of improving accessibility and air quality, but are far from convinced that CTRL provides part of or the whole solution.

4 **National Planning Policy - Deliverability**

- 4.1 Paragraph 71 of the SPP encourages the provision of a generous supply of land, and paragraph 72 makes clear that a "minimum five year effective land supply" must be maintained "at all times".

- 4.2 Paragraphs 77 and 80 emphasises the importance of deliverability, whether the development can be achieved within required timescales, accessibility and co-ordination of land release with investment in infrastructure.
- 4.3 PAN 2/2010 provides guidance on assessing the effectiveness of housing land. It clearly states that to be considered effective a site must be free from constraint such as vehicle access, must have committed public funding in place from the public bodies concerned if necessary, and be either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development.

5 **Conclusion**

- 5.1 The implication of the Proposed Plan is that a significant number of houses are tied up in the CTRL web and cannot be built until CTRL is in place as is the case with Scone North. Meanwhile, allocations to other sites such as Stanley H30-34 which are free from constraints and available for early development appear to have been minimised at the expense of the CTRL linked developments.
- 5.2 Scottish Planning Policy clearly requires that the Perth and Kinross Local Development Plan allocates and maintains a minimum 5 year supply of effective land at all times. As CTRL is considered unlikely to be in place by 2020 at the very earliest, Scone North cannot be considered effective and is unlikely to deliver any housing until after 2020.
- 5.3 Therefore ZAL urges PKC to reconsider the initial housing allocation to Scone for the period to 2024. In accordance with Scottish Government Policy the new LDP has to allocate an effective land supply and must be generous enough to allow flexibility in the event of difficulties with delivery. Therefore ZAL requests that the initial allocation of housing to Stanley is increased to 280 houses and scope is built in for further development beyond 2024 in the event of delays to the delivery of CTRL and the knock on effect that would have to the delivery of housing land in the Perth Core. Land at Stanley in the control of ZAL is free from constraints, fully effective and can make an early and long lasting contribution to the supply of much needed housing. Above all, the development is deliverable within the required timescales. It would therefore be logical to increase the allocation as suggested.

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	Zurich Assurance Ltd c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place Perth PH1 5NE
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.	Bertha Park H7	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.

No objection to identification of site but objects to house numbers allocated in first phase and seeks reallocation to other settlements such as Stanley.

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

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BIDWELLS

Perth & Kinross Council – Proposed Local Development Plan Consultation Response

Zurich Assurance Ltd – Objection Site H7

10 April 2012



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1 Introduction

- 1.1 Zurich Assurance Ltd (ZAL) objects to the number of houses and phasing of development allocated to Bertha Park.
- 1.2 Bertha Park lies to the north of Perth. It is separated from Perth by the River Almond, the Inveralmond Industrial Estate and the A9 city by-pass.

2 Bertha Park Landscape Character

- 2.1 Much of the Bertha Park allocation lies in a shallow valley to the north of the River Almond. However part of the allocation also includes topographically undulating ground on higher land along its northern edge. The northern boundaries are largely defined by existing mixed woodlands which trend east-west along the ridges surrounding Bertha Loch.
- 2.2 The allocation is largely hidden from most views from Perth and the adjacent A9 trunk road. Woodland belts along the banks of the Almond help screen the proposed site from immediate views from the Inveralmond Industrial Estate. The expansion of the site onto the higher ground to the north would render development here much more visible.
- 2.3 The area around the loch is very attractive being a pleasant mix of rolling farmland, woodlands and Bertha Loch itself. This would be lost in the event that Bertha Park were to proceed to development.
- 2.4 The extent of H7 as indicated on the plans in the Proposed Plan would bring development into close proximity to Almondbank and Pitcairngreen. Therefore there is a high risk of visual coalescence at this western end of the site.
- 2.5 The potential introduction of the CTRLR would have a major impact on the character and quality of the landscape in this area. It would also presumably curtail the development potential to the north of the site. If the CTRLR is not built to provide access to the site then alternative new accesses would be required to be established. These are potentially going to have an impact on the woodlands and the river Almond as well as potentially Almondbank village.

3 Bertha Park Access Constraints

- 3.1 At present there is a "left in" only access from the north bound section of the A9 and a secondary access from within Inveralmond Industrial Estate. Neither access is capable of accommodating the scale of development proposed.

- 3.2 There are several major constraints that have to be overcome before any houses can be built at Bertha Park.
- 3.3 Firstly, any valuable minerals have to be extracted from the site before any housing development can commence. This area is known for being mineral rich and if the presence of "valuable minerals" is confirmed the process, prior to any development, will involve thorough site investigation, EIA, planning consent and of course mineral extraction and restoration. This process could take several years.
- 3.4 A new bridge will have to be constructed over the River Almond to access Bertha Park – and link the site to the A85. The area indicated as part of the CTRL route that would cross the Almond is identified by SEPA as being at significant risk of flooding and a new bridge here, unless designed of sufficient span, will increase the likelihood of flooding. The River Almond is also part of the River Tay SAC and SPA and therefore the environmental impact of the proposed bridge and associated works must be fully assessed. Again the time and cost implications are of concern.
- 3.5 Furthermore, the CTRL junction with the A9 is also "required at the commencement of development". The Draft Action Plan indicating a timescale for CTRL delivery of 2020. This timescale is considered unrealistic for the reasons listed below:
- there is no public funding in place
 - the final route has not been agreed with serious constraints in providing connection to the A9 southbound from the route indicated in the Proposed Plan due to the close proximity of the River Tay and Perth – Inverness railway line
 - land assembly is an outstanding issue with Compulsory Purchase Orders a likely requirement
 - some design work has been undertaken although it remains unclear given the proximity of the railway and River Tay that the route can actually deliver
 - Transport Scotland have not given any approval for CTRL and have raised doubts about the proposed CTRL corridor indicated in the Proposed Plan
 - the road and associated bridge(s) have still to obtain planning consent and it is certain a Public Inquiry will have to be held before it can be considered 'committed'.
- 3.6 It is suggested that based on similar major infrastructure projects 2022-2025 is a more realistic assessment.

4 **Delivery**

- 4.1 The Bertha Park allocation to 2024 amounts to roughly 25% of the Perth Core Allocation for the same period, a contribution of 75 units per annum. Delivery of this scale of development would be a significant task at the best of times with a site free of constraint, but given the significant constraints to the development of the site it is unlikely that any houses will be built within the first five years of the new Plan period. Therefore it is most unlikely that the Bertha Park development can contribute the required number of houses within the designated timescale.

5 **National Planning Policy**

- 5.1 Paragraph 71 of the SPP encourages the provision of a generous supply of land, and paragraph 72 makes clear that a "minimum five year effective land supply" must be maintained "at all times".
- 5.2 Paragraphs 77 and 80 emphasises the importance of deliverability, whether the development can be achieved within required timescales, accessibility and co-ordination of land release with investment in infrastructure.
- 5.3 PAN 2/2010 provides guidance on assessing the effectiveness of housing land. It clearly states that to be considered effective a site must be free from constraint such as vehicle access, must have committed public funding in place from the public bodies concerned if necessary, and be either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development.
- 5.4 It is quite clear that the development at Bertha Park can only proceed after the CTRLR has been constructed. It is equally clear that CTRLR is unlikely to be constructed before 2020 and more likely by 2022. Therefore and in accordance with PAN 2/2010 and the SPP the development cannot yet be considered effective and the allocation of 750 houses to Bertha Park for the period to 2024 is optimistic and premature and cannot be relied upon.
- 5.5 It is therefore considered that the initial allocation of 750 houses to Bertha Park should be reconsidered as it does not comply with Policy set out in the SPP, advice set out in PAN 2/2020 and advice from the Scottish Ministers set out in a letter from the Chief Planner to the Heads of Planning dated 29 October 2010.

6 Conclusion

- 6.1 ZAL does not object to the identification of Bertha Park as a strategic location for housing development. However, the allocation is entirely dependant on a major piece of infrastructure which is many years away from being delivered, if in fact it can be delivered at all as there are serious constraints to the route indicated in the Proposed Plan.
- 6.2 In order to address issues such as deliverability, effectiveness and flexibility of housing land supply, as required by Scottish Government Policy, the strategy of relying so heavily on sites such as Bertha Park to deliver growth to the Perth Core Area as directed by TAYplan, when the delivery of the required infrastructure is so doubtful within the specified timescale, must be seriously questioned.
- 6.3 If the only way in which Perth and Kinross Council can meet its obligation to allocate an effective land supply is to reconsider the initial allocation of houses to developments such as Bertha Park that are reliant on CTRL and other major infrastructure it must be realistic about their timescales and deliverability. Therefore housing should be re-allocated to settlements such as Stanley, which is free of CTRL related constraints, has capacity to accommodate future development as evidenced by the future allocation of 120 houses, and otherwise meets the terms of effectiveness as set out in PAN 2/2020. ZAL seeks an increase in the initial allocation to Stanley to 280 houses.

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

Name	Zurich Assurance Ltd c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place Perth PH1 5NE
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" value="Perth West H70"/>	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.

No objection to identification of site but objects to house numbers allocated in first phase and seeks reallocation to other settlements such as Stanley.

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

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BIDWELLS

Perth & Kinross Council – Proposed Local Development Plan Consultation Response

Zurich Assurance Ltd – Perth West Ref H70

10 April 2012



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1 Introduction

- 1.1 This representation is submitted on behalf of Zurich Assurance Ltd (ZAL) in respect of site H70 Perth West. The Proposed Plan allocates a total of 550 houses to Perth West in the period to 2024 with a further 2500 for the period beyond 2024. ZAL does not object to the identification of the site as a long term strategic housing allocation. However, it is quite clear that delivery of Perth West is reliant on major new transport infrastructure being put in place to serve the development from the A9 or Broxden roundabout to the south, and connect to the A85 and Cross Tay Link Road to the north in addition to establishing connections to Perth across the City by pass to ensure permeability.
- 1.2 Therefore ZAL has concerns about delivery of the Perth West allocation of 550 houses within the timescale required (2024). ZAL therefore seeks re-allocation of housing land from Perth West to Stanley and possibly other settlements with the Perth Housing Market Area in the initial period to 2024. The proposed development at Stanley is not reliant on significant up front public investment and infrastructure provision. It is therefore logical to maximise the allocation of housing to Stanley to 2024 and beyond.

2 Perth West Landscape Character Issues

- 2.1 Perth West is an extensive allocation on the west side of the A9 dual carriageway on land which is predominantly agricultural. The site is on a generally long north facing slope leading down to the A85 and the River Almond. It is subdivided by hedgerows and mature tree belts mostly around Glendevon Farm at the eastern edge of the site.
- 2.2 This is a highly visible site and development here will clearly be seen by users of the A9 arriving from Glasgow and the south and currently has an open aspect to the Broxden Roundabout. It will be equally highly visible from the A85 which runs along the northern boundary. Development would be clearly visible as the land rises to the south. The site is less visible from the A9 Ring Road between Broxden and Inveralmond due to a comprehensive tree belt alongside the road and the fact that the road is in cutting for much of its length.

- 2.3 The key issue in landscape and townscape terms for this allocation is the establishment of the comprehensive expansion of Perth outside the Ring Road creating a major extension of the city into the rural hinterland. A critical issue of sustainable development is the potential connectivity of developments to the existing settlement. The potential problem for this site is how such connections can be forged across the A9 dual carriageway to ensure safe and comfortable pedestrian, cyclist and bus access to the city. Vehicular access to the site from the surrounding road network will equally be challenging given the strategic nature of the A9 trunk road.

3 **Perth West Access Constraints**

- 3.1 Like so many of the sites allocated within the Perth Core the site cannot deliver any housing until solutions to the major access constraints have been resolved and multiple suitable access points have been identified and implemented. These constraints are located on the strategic road network which is of national importance.
- 3.2 Perth West was a late addition to the Proposed Plan after the Council voted to delete Almond Valley village and replace it with the Perth West allocation. This move has major implications for the traffic and air quality solutions put forward by the Council in terms of CTRLR and the A85/A9 junction which were all predicated on Almond Valley being delivered and have not been factored in Perth West in its place. Therefore at this stage the implications and ramifications of the inclusion of Perth West on the 'traffic and air quality improvements package' are unclear. We would now question the validity of the Council's Transport Strategy in terms of what it is attempting to deliver in terms of strategic transport movement around Perth.
- 3.3 It is clear multiple access points are necessary (in line with Designing Streets Policy) and that they cannot be concentrated on the A85. It is also clear that the present arrangement of Broxden roundabout will not permit an additional spur to provide access to Perth West. It is also clear that there is insufficient distance between Broxden and the western edge of the site to permit a further roundabout to serve Perth West. Therefore the only solution is for Broxden to become a grade separated junction. This is a significant engineering challenge which will need agreement from Transport Scotland and the Council and will no doubt require Compulsory Purchase Orders to assemble the necessary land. There is also the question of cost, who pays for the new junction and what is reasonable timescale for delivery. As it is only required to serve Perth West the brunt of the cost which will be considerable must be borne by the developer prior to any housing being built onsite. This will place a major question mark over the deliverability of Perth West.

- 3.4 As mentioned above, the studies carried out by PKC on CTLR and the transport package did not account for development at Perth West and no development at Almond Valley. In such circumstances the STAG appraisal carried out on CTLR and the Traffic and Transport Issues Transport Appraisal 2010 must be considered unreliable and that Perth West will further exacerbate traffic at Broxden and the A85 into Perth. The Council needs to rethink its transport strategy for Perth, in particular trunk road traffic around Perth.
- 3.5 Perth West must also overcome the constraint of crossing the A9 and linking to the current western edge of Perth to ensure connectivity and permeability. Otherwise all access points will be focussed on the A85 and a grade separated Broxden roundabout. Such an approach would be at odds with Scottish Government Policy set out 'Designing Streets'.

4 **National Planning Policy**

- 4.1 Paragraph 71 of the SPP encourages the provision of a generous supply of land, and paragraph 72 makes clear that a "minimum five year effective land supply" must be maintained "at all times".
- 4.2 Paragraphs 77 and 80 emphasises the importance of deliverability, whether the development can be achieved within required timescales, accessibility and co-ordination of land release with investment in infrastructure.
- 4.3 PAN 2/2010 provides guidance on assessing the effectiveness of housing land. It clearly states that to be considered effective a site must be free from constraint such as vehicle access, must have committed public funding in place from the public bodies concerned if necessary, and be either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development.
- 4.4 At this stage the traffic access solutions have not been identified and an assessment of their viability and deliverability cannot be carried out. With no access solution in place Perth West cannot currently be considered an effective site. Therefore the allocation of 550 houses to 2024 is premature.
- 4.5 Meanwhile, allocations to other sites such as Stanley H30-34 which are free from constraints and available for early development appear to have been minimised at the expense of another development site that is constrained by major transport infrastructure requirements.

5 Summary and Conclusions

- 5.1 Scottish Planning Policy clearly requires that the Perth and Kinross Local Development allocates and maintains a minimum five year supply of effective land at all times. The site at Perth West cannot currently be considered effective and its ability to deliver any housing before 2024 is far from certain.
- 5.2 Therefore ZAL urges PKC to reconsider the initial housing allocation to Perth West for the period to 2024. In accordance with Scottish Government Policy the new LDP has to allocate an effective land supply and must be generous enough to allow flexibility in the event of difficulties with delivery. Therefore ZAL requests that the initial allocation of housing to Stanley is increased to 280 houses and scope is built in for further development beyond 2024 in the event of delays to the delivery of CTRLR and the knock on effect that would have to the delivery of housing land in the Perth Core. Land at Stanley in the control of ZAL is free from constraints, fully effective and can make an early and long lasting contribution to the supply of much needed housing. Above all, the development is deliverable within the required timescales. It would therefore be logical to increase the allocation as suggested

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Address and Postcode	5 Atholl Place Perth PH1 5NE
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

Policy ref.	<input type="text"/>	or
Site ref.	Luncarty South H27	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**

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Perth & Kinross Council – Proposed Local Development Plan Consultation Response

Zurich Assurance Ltd – Luncarty South Ref H27

10 April 2012



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1 Introduction

- 1.1 This representation is submitted on behalf of Zurich Assurance Ltd (ZAL) in respect of site H27 Luncarty South. The Proposed Plan allocates a total of 400+ houses to Scone North with 200 to 2024 and an additional 200+ for the period beyond 2024. ZAL does not object to the identification of the site as a long term housing allocation. However, ZAL is concerned about the ability of Luncarty South to delivery the prescribed housing numbers, particularly in the initial plan period, with respect to the access constraints that must be overcome before significant development can proceed.
- 1.2 Therefore ZAL seeks re-allocation of housing land from Luncarty South to the neighbouring village of Stanley and possibly other settlements within the Perth Housing Market Area in the initial period to 2024. The proposed development at Stanley is not reliant on significant up front public investment and infrastructure provision. It is therefore logical to maximise the allocation of housing to Stanley to 2024 and beyond.

2 Luncarty South Landscape Character

- 2.1 Luncarty South is a large site of 64Ha situated on the south side of Luncarty Village. It is a very open and flat site which offers little by way of landscape structure. It is made up of primarily arable farmland which has very few hedgerows, no woodlands and just a thin belt of trees along the banks of the River Tay to the south. The Proposed Plan indicates a large belt of landscaping to the east to satisfy the need to provide a buffer to the River Tay which is an SAC.
- 2.2 Development on this site would be clearly visible from the A9 and from the Perth-Inverness railway line and would require extensive landscape mitigation in order to reduce any adverse impacts on the approach to Perth from the north.

3 Luncarty Access Constraints

- 3.1 One of the main constraints to development on this site, even in the short term, is the need to provide a new access from the existing road network. The Proposed Plan states that only 75 houses can be occupied until a connection to "the new A9 junction" is in place.

- 3.2 The indicative access point and new road shown on the Proposed Plan (Luncarty page 134) is at the northern end of the site via the B9099 and Scarth Road. The existing junction is approximately 6m above the level of the proposed development site and is further constrained by a dwelling house on the south side of Scarth Road. The construction of a new junction and/or a roundabout and associated footways to the development in this location would necessitate a significant embankment to be constructed giving rise to potentially adverse visual impacts to the properties along Scarth Road and at the entrance to Luncarty Village itself.
- 3.3 There is also a requirement to provide a new junction to the A9, and only 75 houses can be built before this junction is in place. It is unclear how a new access to the A9 can be provided given the current junction spacing to Inveralmond roundabout. Transport Scotland is unlikely to support a left in left out only arrangement onto the A9, or the intensification of existing farm access track at Denmarkfield, and there are limited prospects of connecting to proposed CTRL route given the constraints posed by the proximity of the railway and the River Tay.
- 3.4 If the only solution is a connection to the CTRL route then the timescale for delivery of the 125 currently constrained houses at Luncarty South will be delayed until at least 2020, and more realistically 2022 – 2025 because of the difficulties to be overcome in implementing the proposed Cross Tay road and bridge link. It is therefore considered that the initial 200 house allocation to 2024 cannot be considered effective until such time that it is known how the site can connect to "the new A9 junction". The ability of Luncarty South to deliver those 200 houses within the required timescales is therefore uncertain.

4 **National Planning Policy**

- 4.1 Paragraph 71 of the SPP encourages the provision of a generous supply of land, and paragraph 72 makes clear that a "minimum five year effective land supply" must be maintained "at all times".
- 4.2 Paragraphs 77 and 80 emphasises the importance of deliverability, whether the development can be achieved within required timescales, accessibility and co-ordination of land release with investment in infrastructure.
- 4.3 PAN 2/2010 provides guidance on assessing the effectiveness of housing land. It clearly states that to be considered effective a site must be free from constraint such as vehicle access, must have committed public funding in place from the public bodies concerned if necessary, and be either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development.

5 Deliverability

- 5.1 The Proposed Plan relies very heavily on sites such as Luncarty South that cannot proceed until major new road infrastructure is in place. It is not yet clear what form the new infrastructure will take, where and when it will be built and who will pay for it. Meanwhile, allocations to other sites such as Stanley H30-34 which are free from infrastructure constraints and available for early development appear to have been minimised at the expense of these developments.
- 5.2 Scottish Planning Policy clearly requires that the Perth and Kinross Local Development allocates and maintains a minimum 5 year supply of effective land at all times. Given the uncertainty about access to "the new A9 junction" the effectiveness and ability of Luncarty South to deliver 200 units by 2024 is questioned.

6 Conclusion

- 6.1 ZAL urges PKC to reconsider the initial housing allocation to Luncarty South for the period to 2024. In accordance with Scottish Government Policy the new LDP has to allocate an effective land supply and must be generous enough to allow flexibility in the event of difficulties with delivery. Therefore ZAL requests that the initial allocation of housing to Stanley is increased to 280 houses and scope is built in for further development beyond 2024 in the event of delays to the delivery of CTRLR and the knock on effect that would have to the delivery of housing land in the Perth Core.
- 6.2 Land at Stanley in the control of ZAL is free from constraints, fully effective and can make an early and long lasting contribution to the supply of much needed housing. Above all, the development is deliverable within the required timescales. It would therefore be logical to increase the allocation as suggested

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	Zurich Assurance Ltd c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place Perth PH1 5NE
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.	Stanley H30 - H34	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.

Support the identification of sites H30-H34 in the Proposed Plan but seek changes to increase house numbers and phasing of land release

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

Please see attached document

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Perth & Kinross Council – Proposed Local Development Plan Consultation Response

Zurich Assurance Ltd – Sites H30-H34 Stanley

10 April 2012



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1 Introduction

- 1.1 This representation is submitted on behalf of Zurich Assurance Ltd, in respect of land at Stanley. Whilst ZAL welcomes the proposed allocation of housing land to Stanley set out in the Proposed Plan housing allocations H30-H34, ZAL seeks a change to the Plan to increase to total number of houses allocated to Stanley and the phasing of land release to bring more development forward in the initial 10 year phase.
- 1.2 Sites H30-34 propose an allocation of a maximum of 300 houses to Stanley, with phasing requirement that no more than 180 houses can be occupied before 2024. In the interests of ensuring an adequate supply of effective housing land is provided from the outset of the Plan period the total number of houses allocated to Stanley should be increased to 450 with the first phase restriction lifted to 280 houses.
- 1.3 Stanley is located within the Perth Core Area. As such it is one of the settlements identified as a location for significant growth.
- 1.4 The PKC Main Issues Report of 2010 stated that development within the first 10 year period should be limited as expansion at a greater rate "may cause difficulties", although it did not state what these difficulties may be.
- 1.5 ZAL's response to the MIR confirmed following detailed assessment, that there were no constraints to a more rapid rate of growth. It is disappointing that this assessment does not appear to have been taken into account.
- 1.6 The following paragraphs justify why the allocation should be increased.

2 Effective land in accordance with PAN 2/2010

- 2.1 The sites are in the control of an owner who can release the land for development. The land meets the tests of effectiveness as set out in PAN 2/2010.
- 2.2 There is currently capacity in the Primary School to cope with additional development and there is also capacity within the foul drainage network.
- 2.3 The sites are free from physical constraints such as topography, flood risk and access and contamination.
- 2.4 No public funding is required to make the development at Stanley economically viable, the development stands up on its own, providing that the allocation of housing is sufficient.
- 2.5 Housing with associated economic development land is the preferred use of the land.

3 **Free from significant upfront infrastructure constraint**

- 3.1 Stanley is one of only two proposed allocations within the Perth Core Area that is not dependant on significant upfront infrastructure. Development at Scone, Luncarty and Bertha Park is constrained by the requirement for the Cross Tay Link Road to be constructed.
- 3.2 The effect of this is that only 75 of the 1300 houses allocated to these locations in the 10 year period to 2024 can be occupied prior to the CTRLR being constructed in full or in part. The Draft Action Plan sets out a target for completion of the CTRLR project by 2020. This places a major doubt over the ability of these sites to contribute meaningful house numbers to the annual build rate of 510 houses per annum set by TAYplan, and subsequently the 5 year supply of effective housing land.
- 3.3 The estimated completion date for CTRLR of 2020 is considered unrealistic. At this point there is no agreed final route in place or landowner agreement. It is very likely that the CTRLR project will be subject to a Public Local Inquiry. No detailed design work has been undertaken, with links from CTRLR to the southbound side of the A9 complicated by the close proximity of the River Tay and railway line to the preferred CTRLR route. As such the estimated cost of £91 million must be taken as a very conservative estimate.
- 3.4 Without CTRLR these sites must be considered constrained and non-effective. Therefore there is a very real risk that the significant constraint caused by CTRLR will undermine and ultimately result in a failure to maintain a five year supply of effective land, contrary to Scottish Government Policy. There is little scope for flexibility in the allocations set out in the Proposed Plan and therefore in order to plan for a sufficient land supply with built in flexibility to ensure a 5 year supply of land, the Proposed Plan should be modified to increase housing allocations to effective sites such as those at Stanley.

4 **TAYplan – 2008 based GRO projections**

- 4.1 The situation is exacerbated by the most up to date population projections published by the General Registry Office for Scotland. The 2010 based and the 2008 based population and household projections predict more rapid growth for Perth and Kinross than is envisaged in the 2006 based figures used to inform the Proposed Plan.

- 4.2 In response to questions posed by the Reporter during the TAYplan examination, Perth and Kinross Council confirmed that adoption of the 2008 based figures and the subsequent increase in house numbers need not pose any significant environmental concerns for the Perth Housing Market Area.
- 4.3 At this stage the TAYplan examination has not been completed but there is a possibility that Ministers will modify and require the housing land requirement to reflect the more up to date population projections.

5 **Flexible land supply**

- 5.1 Policy set out in Scottish Planning Policy paragraph 71 requires Planning Authorities to identify a generous supply of land for housing in the development plan that will give the flexibility necessary for the continued delivery of new housing even if unpredictable changes to the effective land supply occur during the life of the plan.
- 5.2 Therefore taking full account of the critical issues and constraints to the delivery of the majority of land within the Perth Core and the inadequate supply of land identified in the Proposed Plan, there is significant scope to increase the allocation of housing land to Stanley.

6 **Access/Roads**

- 6.1 Almost uniquely within the Perth Core Area, development at Stanley is in no way reliant on major up front infrastructure such as the CTRL or A85/A9 junction that will blight development at Scone, Luncarty, Bertha Park and Perth West.
- 6.2 Development can proceed quickly following the adoption of the Plan. Furthermore, accessibility will be improved within the initial 10 year period as the Scottish Government seeks to improve the A9 including a new junction at Tulliebelton Road.
- 6.3 Early release of housing land at Stanley will result in developer contributions being made to the Council's traffic and air management improvement plan. This in turn will contribute to perhaps bringing CTRL and the A85/A9 junction forward and the wider benefits PKC believes this will achieve.
- 6.4 A traffic survey carried out by WSP in 2010 found that 85th percentile average speeds in the village centre were around 31mph. Traffic calming measures have been since implemented on Perth Road with the introduction of a speed table at the Zebra crossing near the school, helping to reduce the speed of through traffic.

- 6.5 There is a perception that there is a high proportion of HGV traffic using Stanley as a through route. The traffic survey revealed that only 2% of traffic was an HGV, with anything less than 5% considered as minimal.
- 6.6 Stanley is well served by public transport and its connectivity would be greatly enhanced by proposed upgrades to the A9 junction to the west. Even without the upgrade Stanley is very well connected by the public road network. In such circumstances access is not a barrier to future development.

7 **Designing Streets**

- 7.1 The proposed development has been assessed for compliance with Scottish Government Policy set out in Designing Streets as set out in ZAL's response to the MIR. The village has a good network of footpaths and a walking isochrone study carried out in 2010 reveals that all of the sites H30-H34 are within a 10-15 minute walking distance of the centre of Stanley.
- 7.2 Each site is within 400 metres of a bus stop. 4 bus services serve Stanley, with an average weekday frequency of one bus every 30 minutes which is considered adequate for a village the size of Stanley.
- 7.3 ZAL wholeheartedly supports Designing Streets and welcomes the opportunity to masterplan the expansion of the village with input from the local community.

8 **Impact on Stanley Village**

- 8.1 Stanley benefits from a good range of public services and facilities. However, Stanley has not seen much growth in recent years which may place a strain on the future of those services. Recent experience has seen new facilities emerge in Murthly and Luncarty as they have experienced population growth which provides the critical mass to sustain the enhanced shops and new village pub/restaurant.
- 8.2 ZAL welcomes the opportunity to provide new employment land as part of the expansion of Stanley village.

- 8.3 At present there is capacity in the Primary School for significant housebuilding and in the WWTW for up to 70 new houses. It is clear that these facilities will require upgrading. It is vital therefore that the housing allocation is sufficient to contribute to the financing of these works. The initial proposed allocation of 180 houses is considered insufficient and may result in delays to the implementation of the expanded facilities. ZAL urges PKC to increase the allocation to 280 houses in the first 10 years in order to ensure that housing land release and delivery of new facilities are synchronised.
- 8.4 Development in Stanley will help sustain and enhance the excellent range of services available. ZAL is in contact with the Community Council and the Stanley Development Trust and is aware of the aspirations of both groups in terms of improvements to the village. ZAL has worked with SDT in providing new footpaths and is keen to assist where it can in the future.
- 8.5 The landscape and visual impact of development at Stanley has been examined. Long term structural landscaping is in place to ensure that new development fits in the surrounding landscape and respects the character and appearance of the existing village.

9 Deliverable

- 9.1 Scottish Planning Policy makes effectiveness and deliverability the two key components of housing land allocation through the development plan process.
- 9.2 The land is in control of an owner who is ready to release the land for development. Part of H33 and H31 already benefit from planning consent. Therefore Stanley can make an early contribution to the housing requirement, free from the significant and as yet undefined time constraints posed by the CTRLR and A85/A9 junctions.

10 Summary

- 10.1 Zurich Assurance Limited welcomes the inclusion of Stanley within the Perth Core Area and the allocation of sites H30-H34. However, ZAL believes that there are significant constraints to the delivery of housing land elsewhere within the Perth Core Area that will result in delivery of approximate two thirds of the initial ten year supply being delayed considerably.
- 10.2 Stanley is free of such constraint and can make an early contribute to the supply of new housing in the area. There is no reason why the initial contribution to 2024 should be limited to 180 houses, and the work carried out by ZAL and its consultants throughout the preparation of the new Plan shows quite clearly that the development is deliverable.

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- 10.3 Therefore and in the interests of compliance with Scottish Government Policy in respect of allocation a generous supply of housing land with built in flexibility, and in maintaining a five year supply of effective housing land, ZAL urges PKC to increase the initial allocation to 280 houses, with a secondary phase of up to 170 houses post 2024.

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

Name	Zurich Assurance Ltd c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place Perth PH1 5NE
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"/>	or	
Site ref.	<input type="text" value="Perth Area Spatial Strategy"/>	or	
Chapter	<input type="text" value="5"/>	Page no. <input type="text" value="69"/>	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.

Objects to the distribution of housing land within the Perth Core with a significant proportion of housing land reliant on Cross Tay Link Road and other infrastructure, which may not be delivered in the specified period. Increased allocation sought for Stanley Village.

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

Please see attached document

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Perth & Kinross Council – Proposed Local Development Plan Consultation Response

Zurich Assurance Ltd

10 April 2012



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1 Introduction

- 1.1 TAYplan (Proposed) requires that approximately 510 houses will be needed each year in order to accommodate projected population growth. Therefore it is vital that the allocated sites are deliverable within the Plan period. Accordingly allocations to sites free from serious infrastructure constraint should be maximised. Therefore allocations to Stanley (H30-H34) should be maximised.
- 1.2 Paragraph 71 of the SPP encourages the provision of a generous supply of land, and paragraph 72 makes clear that a "minimum five year effective land supply" must be maintained "at all times".
- 1.3 Paragraphs 77 and 80 emphasise the importance of deliverability, whether the development can be achieved within required timescales, accessibility, and co-ordination of land release with investment in infrastructure.
- 1.4 PAN 2/2010 provides guidance on assessing the effectiveness of housing land. It clearly states that to be considered effective a site must be free from constraint such as vehicle access, must have committed public funding in place from the public bodies concerned if necessary, and be either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development.

2 Constrained Allocations

- 2.1 Table 1 illustrates the proposed housing allocations within the Perth Core Area to 2024 and beyond, and highlights the number of units that are constrained and cannot be delivered until new infrastructure is in place.

Table 1 – Perth Core allocations and 'constrained sites'

Perth Core Sites	to 2024	Beyond 2024	Constrained (2024)
Balbeggie	100	-	90
Bertha Park	750	2,500	750
Bridge of Earn	100	-	-
Oudenarde	-	Additional 400	-

Perth Core Sites	to 2024	Beyond 2024	Constrained (2024)
Luncarty	200	200+	125
Methven	105	-	-
Perth Airport	50	-	40
Perth sites	620	-	-
Perth West	550	2,500	550
Scone	450	350	350
Stanley	180	120	-
Total	3105	6070	1905

- 2.2 It is a significant concern that 1,905 of the 3,105 houses allocated for the Perth Core to 2024 are constrained until major new transport infrastructure is delivered. In accordance with the guidance set out in PAN 2/2010 it is considered that these sites fail the test of effectiveness. Note that Stanley is free from such constraints.
- 2.3 1,355 houses are constrained by the Cross Tay Link Road (CTLR). CTLR is not a committed project in the sense that:
- there is no funding in place
 - the final route has not been agreed
 - no detailed design work has been undertaken therefore no public consultation has taken place on it
 - Transport Scotland have not given any approval for CTLR and have raised doubts about the proposed CTLR corridor
 - Compulsory Purchase Orders are likely to be required
 - the road and associated bridge(s) have still to obtain planning consent
- and it is certain a Public Inquiry will have to be held before it can be considered 'committed'.

- 2.4 The Draft Action Plan has a CTLR delivery timescale of 2020 and a start date of 2018 has been mooted by Perth and Kinross Council. Given the outstanding work to be undertaken on the project and the extreme difficulties and challenges that will be faced in completing those tasks the indicated timescales are considered unrealistic based on the timescales historically involved in major transport projects. In the event of the CTLR requiring a public inquiry a more realistic timescale is probably 2022/23. Therefore the deliverability of housing land allocations at Scone, Luncarty, Bertha Park, Balbeggie and Perth Airport for the period to 2024 is completely unreliable.
- 2.5 The constraints to delivery are discussed in more detail below.

3 **Bertha Park – site H7**

- 3.1 Much of the Bertha Park allocation lies in a shallow valley to the north of the River Almond.
- 3.2 The allocation is largely hidden from most views from Perth and the adjacent A9 trunk road. The expansion of the site onto the higher ground to the north would render development here much more visible. The area around the loch is very attractive being a pleasant mix of rolling farmland, woodlands and Bertha Loch itself. This would be lost in the event that Bertha Park were to proceed to development.
- 3.3 There is a high risk of visual coalescence with Almondbank and Pitcairngreen which is a major concern.
- 3.4 Access to the site consists of a 'left in left out' slip from the A9 northbound and a minor road through Inveralmond Industrial Estate. The current access arrangements would not permit minor development far less the scale of development proposed. Accordingly development is constrained until The Cross Tay Link Road junction with A9 and a new crossing of the River Almond and a connection to the A85 are in place.
- 3.5 However, there is also a requirement set out in the Proposed Plan that any valuable minerals are extracted from the site prior to any development. This will require thorough site investigation, Environmental Impact Assessment, and securing statutory consents before extraction and restoration can take place.
- 3.6 With the timescale of at least 2020 until the required transport infrastructure being in place Bertha Park will have to deliver 750 houses in a minimum of 4 years - 0 per annum for the first six years and 188 per annum for the last four years. The prospects of delivery are considered unrealistic and the allocation is considered undeliverable within the required timescale.

4 **Scone – site H29**

- 4.1 This is a large 63 ha site situated on the northern edge of Scone. It is made up of two land parcels separated by a substantial belt of forestry plantation woodland. Each land parcel is subdivided by field boundaries made up of hedgerows. An extensive forestry plantation provides a substantial backdrop to all of the H29 allocation. Should it be removed as part of a felling programme then plainly this backdrop and setting for future development would be lost.
- 4.2 The eastern parcel occupies high ground up to 110m AOD with open slopes running south-easterly down to the A94. This area of land is very open and exposed and lies on a shoulder which rises above the current northern boundary of Scone. As a result it is open to long views from the A94 and from properties and small communities to the higher ground to the east such as Murrayshall and Muirhall. New development would be highly visible from the A94 notably for road users travelling south from Scone Airport direction. There is a long term risk of visual coalescence between Scone and Perth Airport.
- 4.3 The western parcel lies on south-westerly facing ground above the northern edge of Scone. This parcel of land lies within the Designed Landscape of Scone Palace and is therefore sensitive to new development with regard to potential impacts on the estate.
- 4.4 The major constraint to delivery of the development is the link to CTRL. The Proposed Plan states that no houses can be occupied until CTRL is "constructed". It is clear from "Shaping Perth's Transport Future" that CTRL is required to release development land on the east bank of the Tay, and that with the current road infrastructure such scale of development would lead to unacceptable impact on the road network.
- 4.5 The timescales involved in delivering CTRL and the first phase of housing do not tie up and there is little prospect of delivering 350 houses at Scone North before 2024. This allocation is considered undeliverable with the required period.

5 **Luncarty – site H27**

- 5.1 The site lies on the south side of Luncarty Village. It is a very open and flat site which offers little by way of landscape structure. It is made up of primarily arable farmland with few hedgerows, no woodlands and just a thin belt of trees along the banks of the River Tay to the south. The Proposed Plan indicates a large belt of landscaping to the east to satisfy the need to provide a buffer to the River Tay which is an SAC.

- 5.2 Development on this site would be clearly visible from the A9 and from the Perth-Inverness railway line and would require extensive landscape mitigation in order to reduce any adverse impacts on the approach to Perth from the north.
- 5.3 Access from the existing road network to the proposed new road indicated in the Proposed Plan is complex. This is already a difficult junction which is on a bend and simultaneously crosses the railway resulting in poor visibility. The existing junction is approximately 6m above the level of the proposed development site and is further constrained by a dwelling house on the south side of Scarth Road. The construction of a new junction and/or a roundabout and associated footways to the development in this location would necessitate a significant embankment to be constructed giving rise to potentially adverse visual impacts to the properties along Scarth Road and at the entrance to Luncarty Village itself.
- 5.4 There is also a requirement to provide a new junction to the A9, and only 75 houses can be built before this junction is in place. It is unclear how a new access to the A9 can be provided given the current junction spacing to Inveralmond roundabout. Transport Scotland is unlikely to support a left in left out arrangement onto the A9 and there are limited prospects of connecting to proposed CTRLR route given the constraints posed by the proximity of the railway and the River Tay.
- 5.5 Therefore there are significant constraints to the delivery of the proposed Luncarty allocation and prospects of delivery by 2024 are poor.

6 **Perth West – site H70**

- 6.1 This is a highly visible site to the west of the A9 on north facing agricultural land and development here will clearly be seen by users of the A9 arriving from Glasgow and the south and currently has an open aspect to the Broxden Roundabout. It will be equally highly visible from the A85 which runs along the northern boundary. Development would be clearly visible as the land rises to the south. The site is less visible from the A9 between Broxden and Inveralmond due to a comprehensive tree belt alongside the road and the fact that the road is in cutting for much of its length.

- 6.2 The key issue in landscape and townscape terms for this allocation is the establishment of the comprehensive expansion of Perth outside the Ring Road creating a major extension of the city into the rural hinterland. A critical issue of sustainable development is the potential connectivity of developments to the existing settlement. The potential problem for this site is how such connections can be forged across the A9 dual carriageway to ensure safe and comfortable pedestrian, cyclist and public transport access to the city. Vehicular access to the site from the surrounding road network will equally be challenging given the strategic nature of the A9 trunk road.
- 6.3 Access to the site is a major constraint. It is clear that development of this scale cannot be served by the A85 alone. However it is not likely that a new spur will be permitted from Broxden roundabout or that Transport Scotland will permit a new junction from the A9 into the site in such close proximity. Realistically, Perth West would need to be served from a new grade separated junction at Broxden with a link road connecting to the A85. Furthermore, the implications of Perth West on CTRL, the current proposed A9/A85 interchange and Inveralmond roundabout is unknown as it was not fully accounted for in the traffic modelling undertaken. Therefore delivery of 550 houses within the required timescale is unrealistic.

7 Conclusion

- 7.1 In James MacKinnon's letter to the Heads of Planning of 29 October 2010 it was made absolutely clear that the "Scottish Ministers continue to place a strong emphasis on the provision of new housing and therefore maintaining a supply of land in the right places which is free of all constraints and can be developed".
- 7.2 Whilst ZAL does not disagree with the principle of developing these sites, the allocation of such a large proportion of the first 10 years' housing land supply to sites dependent on CTRL and other infrastructure at the expense of land at Stanley, which meets the effectiveness criteria and is free from CTRL constraints is illogical, inappropriate, contrary to Policy set out in the SPP, PAN 2/2010 and the advice of the Scottish Ministers of 29/10/10.
- 7.3 There is a serious threat to delivery of housing and maintaining a 5 year supply of effective land.
- 7.4 Zurich Assurance Ltd seeks an increased allocation of 280 houses to 2024 and a further 170 beyond that period. Additional front-loading of development at Stanley would bring forward improvements to village services and enhance the local environment, whilst also contributing to the wider transport infrastructure requirements through developer contributions.

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

Name	Peter McRobbie c/o Bidwells (per Steven Cooper)
Address and Postcode	5 Atholl Place Perth PH1 5NE
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?

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

Policy ref.	<input type="text"/>	or
Site ref.	Donavoured Settlement	or
Chapter	<input type="text"/>	Page no. <input type="text" value="177"/> 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.

Objects to non inclusion of potential development site at Donavoured

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

Please see attached sheet

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1.0 Introduction

- 1.1 This objection is submitted on behalf of Peter McRobbie of Balnacree Farm Cottage, Donavourd.
- 1.2 The objection is in respect of the allocation of housing land within the Highland Perthshire Housing Market Area and in particular to the over-reliance on housing land from small and windfall sites, and the non-allocation of land at Donavourd, Pitlochry.

2.0 Housing Land Supply – Windfall/Small Sites Over Supply

- 2.1 The housing strategy for the Highland Area is set out on page 152 of the Proposed Plan. This sets out a housing requirement of 1120 houses.
- 2.2 With 100 completions in 2010-2011 and an effective supply of 190 there is effectively a requirement to find land for 830 houses in the new Plan.
- 2.3 The proposed strategy is to allow for 110 houses to come from windfall sites (10%) and 170 from small sites (15%). Whilst historically a high proportion of completions have come from such sites, my client feels it is unwise and contrary to Scottish Government Policy to continue to rely on windfall and small sites when opportunities exist to allocate suitable land for development.
- 2.4 Scottish Government Policy is set out clearly in the Consolidated Scottish Planning Policy (SPP). Paragraph 68 clarifies the role of the planning system in identifying a generous supply of land for housing. Paragraph 74 makes it clear that "Planning authorities should ensure that sufficient land is available to meet the housing requirement for each housing market area in full". Therefore it is considered that the Plan should seek to allocate suitable sites where identified.
- 2.5 The strategy set out in the Proposed Plan assumes 25% of the housing requirement will come forward as small or windfall sites. In so doing my client believes that the Proposed Plan does not allocate a generous supply of housing land, nor does it ensure that sufficient land is available to meet the housing requirement. Furthermore, and of particular concern is that such an over-reliance on unplanned development encourages unsustainable settlement patterns. Therefore the strategy for housing land in Highland Perthshire as set out in the Proposed Plan is contrary to Policy set out in the SPP.

3.0 Non-Inclusion of land at Donavourd

- 3.1 My client therefore proposes a change to the Plan to include the allocation of land at Donavourd, Pitlochry for development.
- 3.2 The site and its location are highlighted on the attached plan. The site extends to some 1.65ha. The proposed development would allow 5/6 generous house plots on the lower and flatter areas of land. The more undulating land in the centre would continue to be used for hay cropping or can be designated as open space. Finally a new green corridor will be created on the eastern boundary linking the existing woodland to the south, to the existing wetland to the north. There are also opportunities to connect the development site to the wider network of footpaths in the area.

- 3.3 There are three potential access points within my client's control as shown on the attached plan.
- 3.4 Donavoured is a logical location for development of this small scale. The site is in close proximity to Pitlochry and the services on offer there and is also served by the local bus route. Accordingly small scale development would meet with the objectives of a sustainable settlement strategy.
- 3.5 The site is effective in accordance with PAN 2/2010 in that:
- It is within the ownership of a single party and can be released for development immediately
 - The site is free from constraints related to slope, aspect, flood risk, ground stability, access and contamination
 - The site can be developed in the Plan Period
 - No public funding is necessary to allow development
 - The site is free of infrastructure constraints and housing is the sole preferred use.
- 3.6 In landscape and visual terms the site is well screened from the A9 and wider surroundings by existing tree cover and as such small scale low density development would be seen in context of the similar development which surrounds the site to the east and west and extends to the north, and would not appear obtrusive or incongruous in the wider landscape.
- 3.7 It therefore follows that the site is suitable for development. This is confirmed in the Environmental Report carried out by PKC in 2010 which has assessed the site and highlights it as being free from constraints – see attached extract from the Environmental Report.

4.0 Conclusion

- 4.1 My client has concerns that the housing strategy places an over reliance on small and windfall development. Relying on such unplanned development encourages unsustainable settlement patterns and is contrary to Scottish Government Policy.
- 4.2 Therefore a change to the Plan is proposed to include the allocation of land at Donavoured for 5-6 house plots. The site has been assessed in the 2000 Environmental Report and its development potential highlighted. It is free from environmental constraint and meets the terms of effectiveness. Allocation of the site is in accordance with Scottish Government Policy to allocate generous land supply sustainable settlement patterns and will contribute to the delivery of the housing requirement for Highland Perthshire.

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.

Donavourd Development

