

From: Rose Freeman [REDACTED]
Sent: 03 April 2012 12:50
To: TES Development Plan - Generic Email Account
Subject: Proposed Plan representation from Rose Freeman, The Theatres Trust

Follow Up Flag: Follow up
Flag Status: Green

Attachments: RepresentationForm.pdf



RepresentationForm.pdf (880 KB...)

Our Ref: RF/4069

Proposed Local Development Plan

Thank you for your email of 31 January consulting The Theatres Trust on the publication of the Local Development Plan. The Representation Form does not expand for all the text that we have so our response is in full below.

The Theatres Trust is The National Advisory Public Body for Theatres and was established by The Theatres Trust (Scotland) Act 1978 'to promote the better protection of theatres'. Regulation 25 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008, Schedule 5, paragraph 11, sets out the requirement of all planning authorities that before determining an application for planning permission for development they must consult The Theatres Trust 'where the development involves any land on which there is a theatre as defined in the Theatres Trust 1976.'

We do not support the Plan.

Thank you for including theatres in the description of Social and Community Facilities in the Glossary. However there is no policy that relates to the protection and enhancement of existing social and community facilities.

Paragraph 2.2.2 on page 17 states that the Plan will 'deliver improved retail, leisure and cultural facilities to serve the City and its hinterland'. Both Perth and Pitlochry have excellent theatre facilities which, despite the new concert hall, deserve acknowledgement in a suitable policy for their protection and enhancement as 'anchors' in your cultural offer and to reflect the Vision Statement at para.2.2.2.

Policy PM1B on Placemaking at (g) mentions existing infrastructure should be retained that contribute to the local townscape but is unspecific.

Policy RC1 on Town and Neighbourhood Centres should refer to the importance of existing town centre uses other than retail for their contribution to the vitality of towns and the evening economy.

Policy RC4 on Retail and Commercial Leisure Proposals could be merged with RC1 and its content is very similar.

Most of the texts for the settlement descriptions say that 'The Plan policies encourage the retention and development of town centre uses that ensure continued viability and vitality'. We cannot find any policy that does this for social and community facilities.

Scottish Planning Policy states on page 11 at item 52. on Town Centres and Retailing that:

'Town centres are a key element of the economic and social fabric of Scotland, acting as centres of employment and services for local communities and a focus for civic activity, and make an important contribution to sustainable economic growth. Town centres should be the focus for a mix of uses including retail, leisure, entertainment, recreation, cultural and community facilities, as well as homes and businesses. Retail and leisure uses are fundamental to the concentration of other

activities located in town centres and planning authorities should support a diverse range of community and commercial activities in town centres. The range and quality of shopping, wider economic and social activity, integration with residential areas and the quality of the environment are key influences on the success of a town centre.'

Changes

Section 3.7 deals with Community Facilities and there is an extensive policy for the protection and enhancement of open spaces but a very insubstantial policy CF3 that provides no protection and enhancement for existing facilities, only that their redevelopment or loss may take place under certain conditions. This policy does not reflect the Vision at para.2.2.2 and we suggest this policy is extensively re-worded.

We therefore suggest that the present wording of Policy CF3 is retained but that the following is added before the loss or change of use.

Where demand for facilities arising from new development occurs, additional community and cultural facilities will be provided through enhancement of existing or co-located facilities. Where this is not achievable or feasible, new community and cultural facilities will be provided that are within easy walking distance of the new development.

Community and Cultural Infrastructure cover a wide variety of services and facilities which can include:

- * Education facilities
- * Health & Social Care facilities
- * Police, Fire & Ambulance facilities
- * Libraries, Museums & Galleries
- * Community centres
- * Youth, Children's and Childcare facilities
- * Arts venues and cultural centres
- * Extra Care & other older peoples housing needs
- * Local pubs & clubs
- * Places of worship
- * Training centres
- * Public & private sports & recreation facilities
- * Civic & administrative facilities
- * Allotments/community gardens
- * Public conveniences

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	Rose Freeman, Planning Policy Officer
Address and Postcode	The Theatres Trust 22 Charing Cross Road London WC2H 0QL
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.	CF3	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.

We do not support the Plan.

Section 3.7 deals with Community Facilities and there is an extensive policy for the protection and enhancement of open spaces but a very insubstantial policy CF3 that provides no protection and enhancement for existing facilities, only that their redevelopment or loss may take place under certain conditions. This policy does not reflect the Vision at para.2.2.2 and we suggest this policy is extensively re-worded. - see our email for the rest of the text to this part - the box does not expand.

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

Thank you for including theatres in the description of Social and Community Facilities in the Glossary. However there is no policy that relates to the protection and enhancement of existing social and community facilities.

Paragraph 2.2.2 on page 17 states that the Plan will 'deliver improved retail, leisure and cultural facilities to serve the City and its hinterland'. Both Perth and Pitlochry have excellent theatre facilities which, despite the new concert hall, deserve acknowledgement in a suitable policy for their protection and enhancement as 'anchors' in your cultural offer and to reflect the Vision Statement at para.2.2.2.

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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.

From: Sheila Wright
Sent: 26 March 2012 15:20
To: TES Development Plan - Generic Email Account
Cc: Councillor Caroline Shiers
Subject: Local Development Plan
Follow Up Flag: Follow up
Flag Status: Green

Sent on behalf of Councillor Caroline Shiers

Local Development Plan – Submission from Councillor Caroline Shiers

Page 282 to 285, Blairgowrie – Rattray

1. I would like to see more utilisation of brownfield sites as development land in order to reduce the amount of Greenfield land required to be made available.

Specifically, I would like to see the land at Westfields of Rattray, Site (B021) in the Draft Plan (3.22ha land) for 80 houses in a mixed development included in the Final Local Development Plan.

This would reduce the necessity for so much land at H63 being required to be made available for housing.

I am unhappy that this site has not been included despite its inclusion in the Draft Plan.

Councillor Caroline Shiers

Local Development Plan – Blairgowrie and Glens

Cllr Caroline Shiers

1. Further to my earlier comments I would like to see the brownfield site at Westfield's of Rattray which was included in the Draft Plan, reintroduced to the Development Plan. One of the biggest concerns expressed to me by local residents is that of the use of prime agricultural land and greenfield sites for housing development is unacceptable when there are a number of empty and brownfield sites within the existing town centre and in the surrounding areas; which could be utilised for housing. The Westfield's of Rattray site was deemed suitable for inclusion in the Draft Plan and I would like to see it reintroduced to the Development Plan.
2. The importance of providing adequate affordable housing within the town is hugely important and again, I believe there is scope in utilising some of the vacant sites within the town for this purpose.
3. The roads network around the town and especially the bridge across the Ericht are under huge pressure and the A924 Alyth Road through Rattray will be put under further pressure by new development in Rattray and further out towards Alyth. I am concerned that the Development Plan needs to take account of this in order to reduce the pressure on the roads in the town centre.
4. More efforts must be made to facilitate cycle paths and improve the Wellmeadow traffic management to allow traffic to flow. Pressure on parking spaces within the town is also a concern which will require to be addressed.
5. Site E31 – there are a number of possible sites of archaeological interest on this site and if development is to be carried out then there must be provision made for a full and comprehensive archaeological survey to be carried out.
6. Site E31 – with reference to this site there are also concerns that this site is prone to flooding and a full flood risk assessment requires to be carried out.
7. Educational Provision – with the increase in housing proposed during the lifetime of the Development Plan I am concerned that not enough provision has been made for a site for a new Secondary School and associated leisure centre which will be required to be provided to service the increased population of East Perthshire.
8. The loss of key recreational areas around Blairgowrie and Rattray has also been raised by a number of residents. It is important that full consideration is given to providing appropriate open space; play areas and footpaths to access the recreational areas outside the town.
9. Play park provision. It is essential that play areas are provided in the Blairgowrie town area as these are lacking for a community this big especially in the area around the new campus. Further development will only make this requirement even more essential.

From: Joanne Murdoch [REDACTED]
Sent: 05 April 2012 17:21
To: TES Development Plan - Generic Email Account
Subject: Proposed Local Development Plan
Follow Up Flag: Follow up
Flag Status: Green

Contact Details:- Phillip & Joanne Murdoch, Birchfield, Scroggiehill, Almondbank, Perth, PH1 3NL

Telephone Number:- [REDACTED]

email address:- [REDACTED]

*We would like to make a representation on the Proposed Local Development Plan Site Ref: Almondbank 06 8938, Site Number 059
Proposed Plan Chapter 5.5, Page Number 88*

We would like to express our support for the boundary changes around our property at Birchfield, Scroggiehill, Almondbank as outlined in the Proposed Local Development Plan. (Page 88)

This slight extension to the village boundary will mean that the land we own and are currently using for recreational purposes will all be within the village boundary. It would also mean that in future years it could potentially be used and developed for housing and the change in boundary would make this process easier in the future.

We feel that the new proposed boundary as detailed in the proposed local development plan is more appropriate to the village and definitely appears to be a natural boundary around our property as it encompasses it all rather than splitting in through the middle.

Regards

Phillip & Joanne Murdoch

08962/1
9

DAVID LITTLEJOHN
HEAD OF SERVICE
PLANNING & REGENERATION
PERTH AND KINROSS COUNCIL

Mr T Rawlings

Woodside

Spittalfield

Perth

RECEIVED

PH1 4JX

22 FEB 2012

20th February 2012

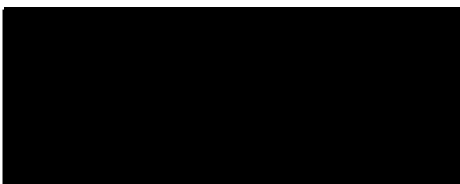
To: The Local Development Plan Team

Re: The proposed development plan in Spittalfield ref MU6

Could you please indicate whether it would be possible to include inclusion to the plan, the possibility of a dwelling 3 bedroom single storey on the ground marked on your plan at Woodside, Spittalfield. We did make a planning application about 3 years ago but there seemed to be a problem with boundaries which have now been resolved on the ordnance survey plan. The site area is approximately 45 metres by 15metres (675 square metres) and is marked in red on the enclosed plan.

Many thanks for your time in looking at this.

Yours sincerely



20 FEB 2012

Mr. Thomas Rawlings

Perth & Kinross Council

PROPOSED LOCAL DEVELOPMENT PLAN

Map showing location of proposed development site

PERTH & KINROSS
COUNCILThe Environment
Service

This map is for notification only and must not be reproduced or used for any other purpose

Perth and Argyll ConservancyAlgo Business Centre
Glennearn Road
Perth PH2 0NJDevelopment Plan Team
The Environment Service
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GDConservator
Syd House

2 April 2012

Dear Sirs

Perth and Kinross Proposed Local Development plan

Thank you for providing Forestry Commission Scotland with an opportunity to comment on the proposed Local Development Plan. We are very pleased to be asked and hope that you will take on board our constructive comments.

I would like to make the following general comments. We also have further and more detailed site specific comments that are appended to this letter.

We welcome the inclusion of policy NE2 on Forestry, Woodland & Trees and the generally positive references in the proposed plan to the contribution that forestry and woodlands can make to a range of economic, social and environmental outcomes. In particular we welcome the commitment to an expansion in woodlands and to the preparation of a forestry and woodland strategy as supplementary guidance to the LDP. We are working closely with the Council on the preparation of the forestry and woodland strategy and will continue to support them to deliver a strategy that delivers woodland expansion and management that contributes to a wide range of objectives.

We would also suggest that a suitable reference is included somewhere in the Plan (perhaps in the proposed Forestry and Woodland strategy supplementary guidance, although within policy NE2 would be ideal) to confirm that any proposals where woodland removal is applied for, that these will be considered against the advice and guidance provided in the Scottish Governments Control of Woodland Removal as confirmed by NPF2 and the combined SPP. We would also suggest that in Policy NE2A that reference is made to best practice as contained in BS5837 "Trees in Relation to Construction"

We welcome the commitments to protect existing trees and woodland, and would welcome the inclusion of "woodlands" in the first sentence of Policy NE3

We welcome the inclusion of policy NE4 on Green Infrastructure and the intention to prepare supplementary guidance on this topic. We would be very keen to work with the Council on the preparation of this supplementary guidance, drawing on our experience of supporting the development and implementation of the Central Scotland Green Network. We would suggest that it would be helpful to include a reference in policy NE4 to the importance of seeking ways to secure and deliver multiple benefits through the development, protection and management of green infrastructure. This is a key element of the green network/infrastructure concept and the current wording fails to highlight this sufficiently. It may also be helpful to refer to the principles set out in the vision for the Central Scotland Green Network

(<http://www.centernalscotlandgreennetwork.org/Vision/vision.html>) in policy NE4 or in the forthcoming supplementary guidance. In relation to the forthcoming supplementary guidance it will be particularly important that this provides clear advice to developers on how green infrastructure should be proactively considered and incorporated into masterplans and development briefs/frameworks for significant development sites/areas from the outset. For example, some of the very large areas proposed for development around Perth and some of the other larger settlements.

We welcome the commitment to the production of supplementary guidance on "Renewable and low carbon energy generation ... " etc but note that there is no reference to this in policy ER1. We would expect the supplementary guidance to cover all types of renewable energy production (including that from woody biomass). It would be helpful if the wording of policy ER1 could make this clear that this is the intention.

In policy ER4B (Restoration of Mineral Workings) we would like to see reference made to positively and proactively considering alternative after uses which will deliver environmental improvements, rather than simply restoring the site to the previous use, when preparing restoration plans. This would be in line with paragraph 235 of the combined SPP. We believe that there are strong links to be made here to the proposed policies NE2 (Forestry, Woodlands and Trees) and NE4 (Green Infrastructure).

In terms of the wording of the policies I would like to suggest some alternative wording

1. Policy NE2A

- a. Para (a) Delete 'forests and'. This currently implies that there is a difference between a Forest and a woodland

- b. Para (b) after 'existing' include **trees and**. After 'especially' change 'woods' to **those**.
- c. Para (c) after 'seek to expand woodland cover' delete ALL remaining text and rewrite with '**with reference to the guidance contained in the Perth and Kinross Forestry and Woodland strategy**'.
- d. Para (d) delete 'protection and'. This is covered under the proposed revised para (b)
- e. Para (e) After 'Conservation Areas and', include **trees**. New sentence at the end of **sites** that should read. Delete 'and secure new tree planting in association with development'
- f. After 'major developments' include '**and secure new tree planting in association** part (c) to simply refer to "seek to expand woodland cover in line with the guidance contained in the Perth & Kinross Forestry and Woodland Strategy". The current wording of part (c) of the policy seems unduly restrictive on the types of woodland expansion that will be supported.

2. Policy NE2B

- a. After 'Tree surveys' include '**prepared by competent and qualified arborists**'
- b. After 'seeks to' in the 'Note' section, include '**ensure that there is a presumption in favour of protecting woodlands and trees in compliance with paragraphs 146-148 of Scottish Planning policy and Scottish Government's Control of Woodland Removal policy**'.
- c. 3rd last bullet point – drop 'native' from the text
- d. 1st, 2nd last and last bullet points. Delete 'forests', unless you can define the difference between a forest and a woodland
- e. New Bullet. To identify trees and woodlands of high nature conservation value in the Perth and Kinross area.

3. Policy NE3

- a. In introductory paragraph, after 'wetlands' include '**woodlands**'

4. Policy NE4

- a. Para (a) suggests to me that new developments will include new areas of green infrastructure and in our mind this is the wrong way round. I would suggest a change of wording to '**Any new development must take into account existing green infrastructure, protect and enhance this infrastructure and ensure that 'green' connectivity within and out-with the site is maintained and appropriately improved**'.

5. Policy NE5

- a. Para (b) after constitutes delete 'woodlands or forestry' and replace with 'woodland creation and management'

6. Policy ER5

- a. At the end of the main paragraph I would suggest inclusion of 'Woodland creation using the right tree in the right place that supports the Scottish Forestry Strategy will be supported'

Yours sincerely

Michael T Strachan
Policy and Development officer



Perth Draft LDP – Sites with perceived issues

The site notes are based on local knowledge of these areas and recent aerial photographs. There has been no time to carry out any site proofing. These are the sites that were felt to be most contentious following a discussion with SNH.

Scone H29 and also route of new road

1. The route of the proposed relief road cuts through an area of prime red squirrel habitat, and to protect this habitat I would suggest that the line of the road moves South West and into the H29 area.
2. Within the H29 area there are areas of woodland and trees, in particular 2 shelterbelts running SSW to NNE in the centre of the site, important field trees left of centre, and on the western edge an area of woodland appears to be proposed for development. We cannot condone any tree removal and would expect the proposed design for housing to incorporate, strengthen and protect the existing green infrastructure. To this end, we would advocate advance planting and involvement in the overall design process.

Ballinluig H40

1. The draft plan indicates an extensive area for housing that would require removal of about 50% of the woodland cover on this site. This is not acceptable and contravenes Scottish Government policy on woodland removal.
2. We would consider supporting a much reduced area that is effectively the western part of the site only and to the immediate east of the recently constructed housing. In essence an area of approximately 25% of what is being proposed.

Strathtay settlement boundary

1. The proposed revised settlement boundary although not explicit in terms of where any housing would be supported, includes an area of woodland. Again we cannot support woodland removal and would request that the line is redrawn to remove the wooded area (NW boundary on western part of the village)

Pitlochry H39

1. The area of woodland identified on the east side of the site has been felled under a CONDITIONAL felling licence approved under the Forestry Act 1967. This places a burden on the landowner to replant this site or an alternative area of land of at least the same size, suitable for trees within the estate boundary.
2. It would be good to see an increase in woodland infrastructure and networks as part of the overall landscape plan for the site
3. Close liaison with the Forestry Commission should be maintained with regards to the conditional felling licence. Tree planting on site should not be seen as a condition of planning until confirmation from FCS that the condition of the Felling Licence has been met.

Blairgowrie H63

1. There are no threats to woodlands from this proposal, but I would like to see advance planting of the proposed site on the western edge as indicated in the draft plan. FCS are happy to offer advice on this.
2. There is an opportunity in the overall site plan to create a habitat network that could link the area of woodland to the north into the proposed area for planting on the western edge, and also down the eastern boundary

Blairgowrie MU5

1. There is an area of woodland on the western edge of the southern part of the site that could be expanded, but also opportunities to create links into other areas of woods and trees out-with the site
2. Advance planting should be considered as soon as possible to get a green structure in place

Ochils Hospital

1. Major reservations about how houses etc could be built on this site without causing significant damage to the woodland and creating unstable trees.
2. No reference to Scottish Government Woodland removal policy
3. Bearing in mind the problems surrounding other sites in Perthshire where trees have been removed to allow for property development, there is a need for a partnership approach on this site to avoid a repetition of problems and public concern

Dunkeld E12 and 13

1. No problems with the site designated for 'employable activities', but I would like to see how woodlands could be incorporated into the site design to provide screening and also habitat links for wildlife.

Aberfeldy E10

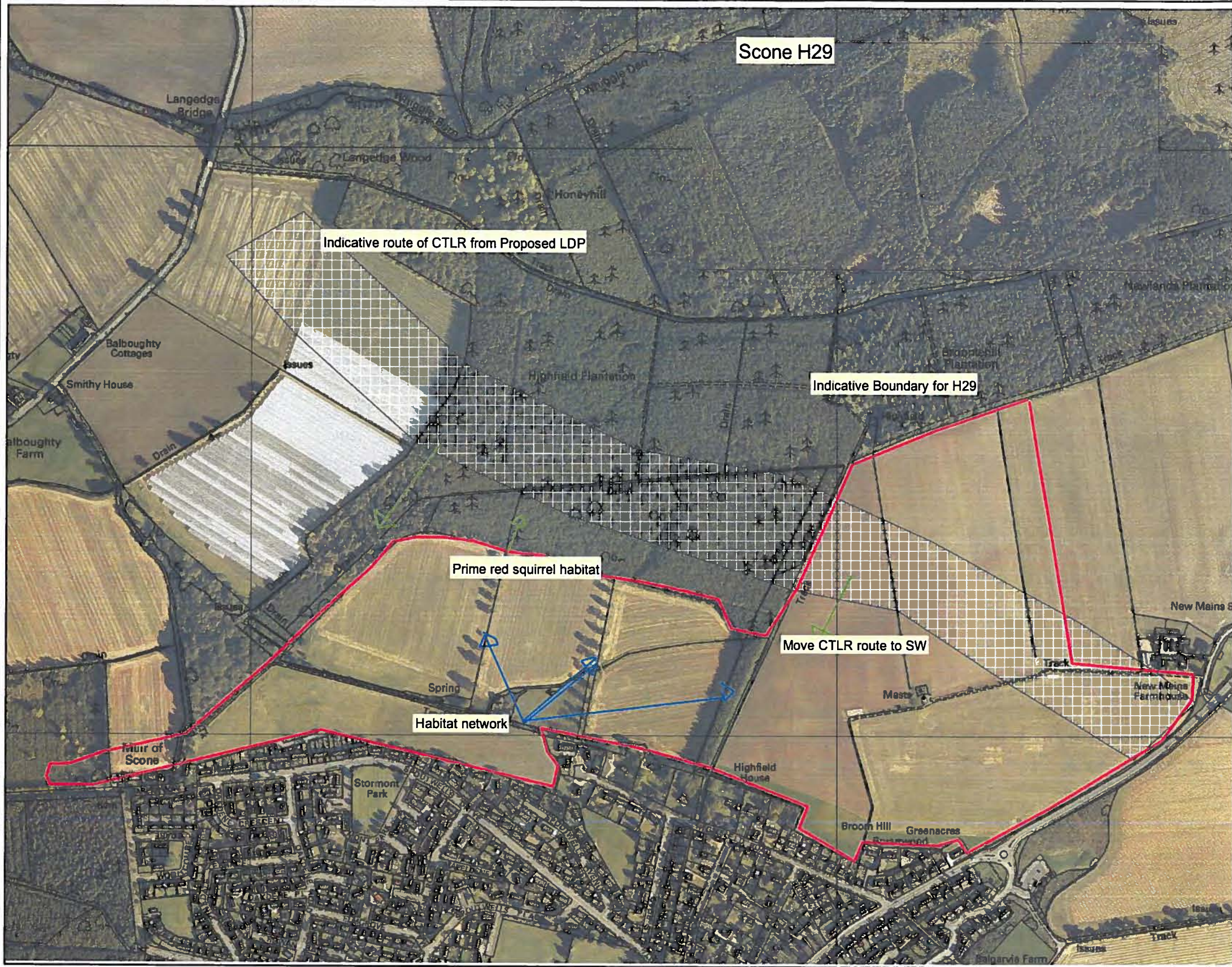
1. No major concerns about this site, but I would encourage additional tree planting on both the NE boundary to strengthen the existing woodland element, and also consideration for some advance tree planting on the SW edge and also within the site

Aberfeldy H37

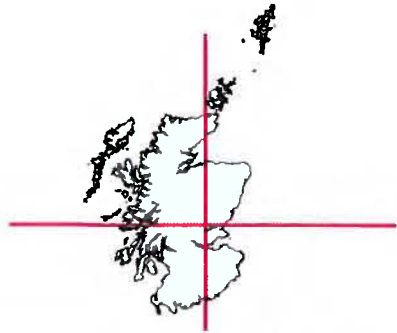
1. There are considerable reservations about including this site as one for housing. It is split east west by a small watercourse that also forms a tree covered habitat network linking the woodlands to the south of the site and beyond to the River Tay riparian zone to the north.
2. The only acceptable option here could be to allocate only the eastern part of the site for development and to ensure adequate protection measures at the same time for the watercourse and associated trees.

Berthapark H7

1. Forestry Commission request that they are involved with the detailed planning of this site and to be included in all aspects of woodland management and creation.

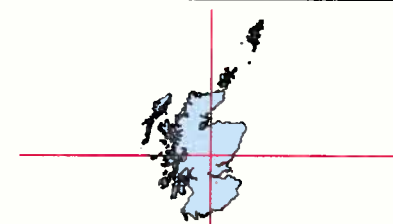


Conservancy
Boundary





Conservancy
Boundary

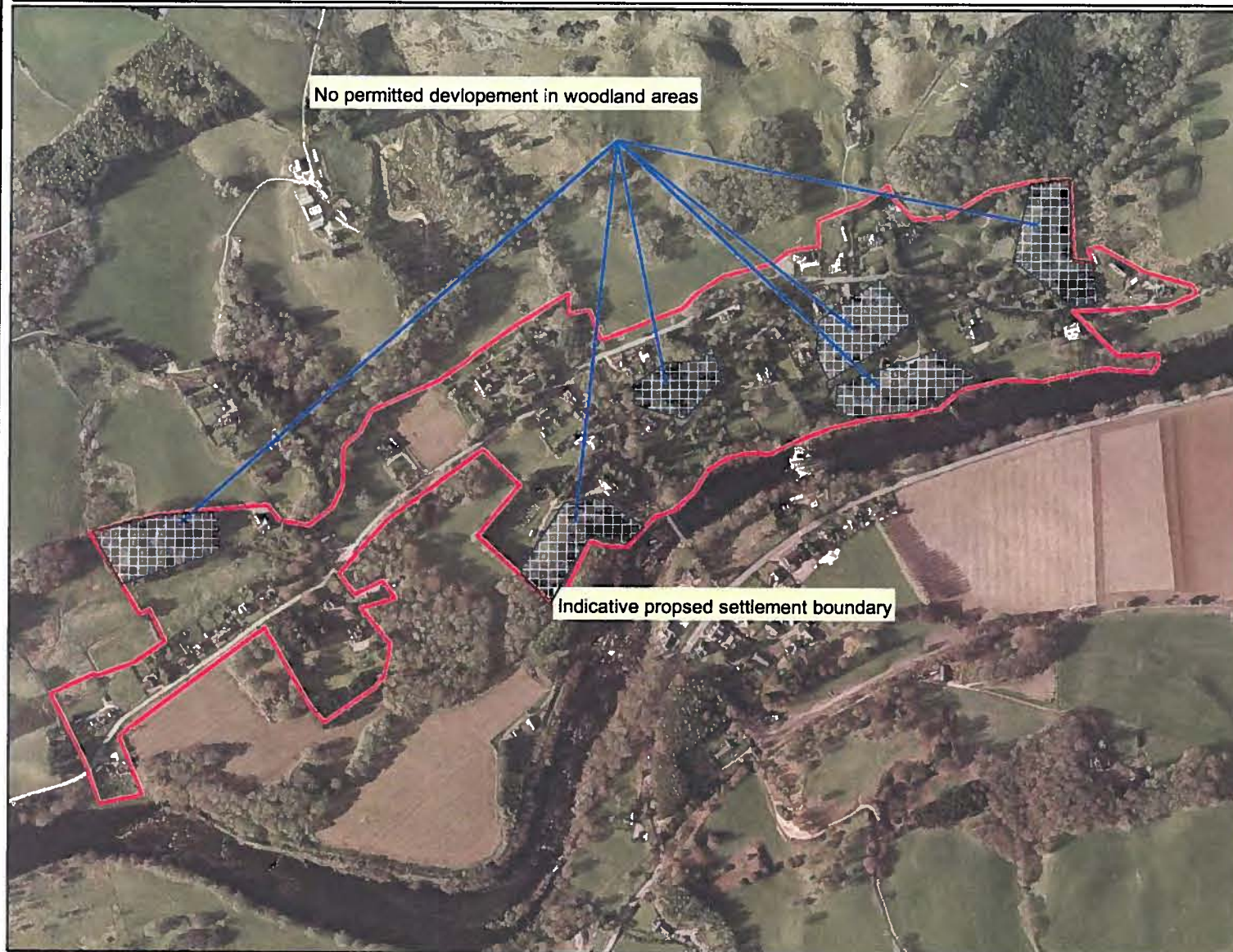


Scotland

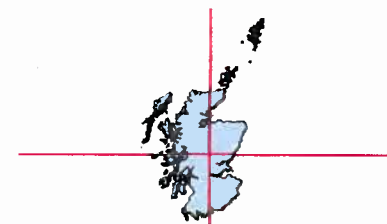


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Strattay settlement boundary



 **Conservancy Boundary**



Scotland



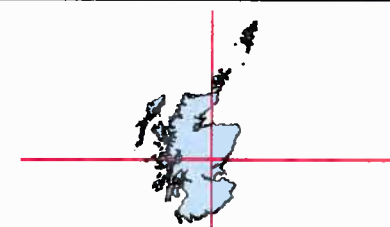
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Blairgowrie H63



Conservancy Boundary



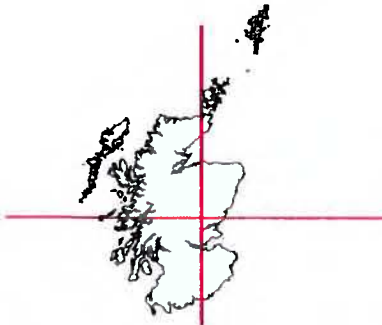
Scotland



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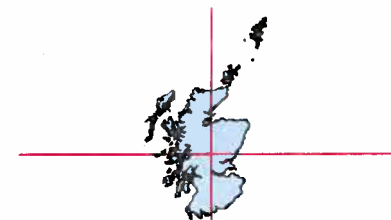


Conservancy
Boundary





Conservancy
Boundary



Scotland



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Perth and Argyll ConservancyAlgo Business Centre
Glenearn Road
Perth PH2 0NJEuan McLaughlin
Development Plan Team
The Environment Service
Perth and Kinross Council
Pullar House
35 Kinnoull Street
Perth
PH1 5GDConservator
Syd House

3 April 2012

Dear Euan

Perth and Kinross Proposed Local Development plan

Thanks for your Email of April 2nd, and hopefully my answers below will resolve your queries. These should be considered as additional to the comments that are currently in the draft plan.

Scone H29 and also route of CTRL

1. The proposed route of the CTRL is the one shown on the proposed plan for Scone. I have copied it as best I can onto an aerial photograph to put it into context. The big issue is the loss of woodland and also the loss of prime red squirrel habitat. Moving the route to the SW would help to accommodate this, but would eat into the area designated for housing. In this instance you should defer to the Scottish Government policy on Woodland removal.
2. Site Developer requirements.
 - a. I would like to see advance planting of any new agreed areas of woodland
 - b. I would also propose retention of woodlands on site and incorporation of these into the overall design.

Ballinluig H40

1. I have enclosed a map that suggests the limit for development at this location, and also a suggestion that the woodland area becomes more managed. The linkages that this area of woodland provides should not be broken, but should be enhanced

Strathtay Settlement Boundary

1. While we remain supportive of an indicative settlement boundary, we would suggest that the Council identifies all areas within settlement boundaries that provide for greenspace and green infrastructure. The aerial photograph has therefore been annotated to suggest an option. Again, we could not support tree/habitat removal/destruction to accommodate housing.

Pitlochry H39

This is not an easy one to articulate, but I will try. Pitlochry estate (the Landowner) received a Felling Licence to remove an area of conifers that ran parallel to the Moulin road – roughly where H39 is written on the PKC map. The felling licence was conditional on the applicant planting and maintaining an alternative area of land with trees and once completed then the 'burden' of the Felling Licence would be lifted. So, how to word this for developer requirements?

1. The developer of this site must confirm in writing that the burden of the Felling Licence as covered by the Forestry Act (1967) has been removed
2. The proposed landscaping of the site and green networks must take into account and incorporate existing features on and off site and provide for habitat and access links.
3. Advance planting of the site to establish the networks should be considered.

Blairgowrie H63

1. Hopefully the annotated aerial photograph will provide an overview of what I think would be good on site
2. Developer requirements – Creation of a green network comprising trees and open space that will provide for habitat and access links both on site and off site
3. Advance planting of green networks

Blairgowrie MU5

1. Developer requirements should include
 - a. Advance planting of woodland areas
 - b. Establishment of a green network to provide links both on and off site
 - c. Rather than creating one large area of community woodland (as suggested) there might be more benefit in provision of a number of smaller areas that could help to break up the pattern of development on site.

Ochils Hospital

Not an easy one to fully assess without seeing the current planning permission. What I would suggest though is

1. Forestry Commission Scotland must be contacted to ensure that the 'comprehensive woodland management plan and specific proposals for implementation' meet the standards required of the UK woodland assurance

scheme. Perth and Kinross Council should defer any further planning approval until Forestry Commission have completed their assessment and provided written feedback to PKC.

Dunkeld E12 and 13

1. Landscape improvements to the site should use tree species traditionally used in the area and support the designed landscape of Dunkeld House.

Aberfeldy E10

1. Tree planting should be considered in advance of construction and should seek to maximise the green and access networks of the area. Tree species should be a mixture of traditional varieties used in the area.

Aberfeldy H37

This site is split north south by a tree lined burn and as such this important habitat should not be broken. I would therefore advocate that only circa 50% of this site (eastern part) is suitable for development – please see annotated aerial photograph.

1. Advance planting of trees should take place
2. Western part of the site should be planted with trees and shrubs to provide for an enhanced habitat network, and to allow for public access and enjoyment.

Bertha Park H7

1. I would like to see advance planting of new woodlands on site
2. A fully integrated green network plan for the site that ties into the proposed wider Perth green network plan
3. A detailed phased programme of works that will improve and enhance the green networks

I hope that these comments are of use to you, and that my aerial photographs make sense

Yours sincerely

Michael T Strachan
Policy and Development officer



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Address and Postcode	c/o Colliers International, 39 George Street, Edinburgh, EH2 2HN
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.	Strathearn Area: Auchterarder Proposals Map	or			
Site ref.		or			
Chapter	8	Page no.	247	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.

Change to Auchterarder Proposals map (page 263) - The settlement boundary should be extended west to the A824 junction with the A9, mirroring the current settlement boundary of Auchterarder as per the boundary consistent with the adopted Strathearn Area Local Plan 2001. The boundary extent west should include Turf Fields in the ownership of Gleneagles Hotel, as explained below.

Change corresponding text at page 261 under heading of "Spatial Strategy Considerations", 5th paragraph.

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

The 5th paragraph on page 261 of the Proposed Plan refers to the proposed settlement boundary adjustment at Auchterarder stating "The settlement boundary has been adjusted to take account of recently completed residential sites and, where necessary, to maintain a separation distance between the town and the A9 trunk road".

The Gleneagles Hotel wishes a change to the proposed settlement boundary shown on the Auchterarder settlement plan. The boundary should be extended west to the A824 junction with the A9, mirroring the current settlement boundary of Auchterarder as per the adopted Strathearn Area Local Plan 2001. The current settlement boundary extends beyond Auchterarder Golf Course and includes adopted local plan employment land allocation ED1 sitting on the A824 western approach into the town.

The reason for this proposed change relates to land in ownership of Gleneagles Hotel lying immediately north of the adopted local plan allocation ED1. This land is referred to as "Turf Fields" and has been promoted by the objector to the LDP Main Issues Report stage dated January 2011 and again in a letter to Mr David Littlejohn (Colliers letter dated 9th November 2011). Turf Fields has been identified as a potential future development opportunity for key-worker accommodation that would be consistent with Proposed Plan Policy ED5 and Policy RD6.

In the objector's response to the LDP Main Issues Report stage (January 2011), Turf Fields was put forward as a suggested site for staff accommodation for the hotel's workforce. This was submitted specifically in response to the MIR question 15 which sought views about the potential requirement of tourism and businesses to make provision for their workforce, either through dedicated staff accommodation or through provision of affordable housing in the local area. This emphasis was again included in written representation to Mr David Littlejohn of Perth and Kinross Council (Colliers letter dated 9th November 2011).

The hotel is encouraged to note the Proposed Plan Policy RD6 supports proposals for particular needs housing and accommodation. The Turf Fields are proposed to provide infrastructural support to the forthcoming 2014 Ryder Cup for car parking. It would however cease to be used beyond the event and may be left vacant and undeveloped. Therefore it could be agreed that any future proposal for Turf Fields could provide for particular needs housing and accommodation associated with the hotel workforce and thus be supported by proposed plan Policy RD6 and Policy ED5.

At page 12 and 13 of the objector's LDP MIR submission the hotel sets out its proposals for Turf Fields in this context, and a site plan of the Turf Fields site was provided in the same response at Appendix 2 of that submission. The Turf Fields proposal was also earlier promoted by the hotel, in the pre-MIR call for sites stage in 2009. The hotel considers the development of Turf Fields would be for particular needs housing and accommodation relating to the hotel's own workforce under Policy RD6 and ED5.

The hotel wishes the Turf Fields site is identified on the Auchterarder settlement plan (for key worker accommodation), and the settlement boundary revised to bring the site into the future settlement boundary.

Save a copy

Print

Submit



30 March 2012

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

By email to: developmentplan@pkc.gov.uk

Dear Sir / Madam

**PERTH AND KINROSS LOCAL DEVELOPMENT PLAN:
PROPOSED PLAN CONSULTATION**

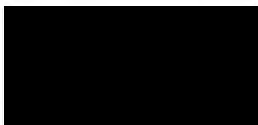
REPRESENTATIONS ON BEHALF OF THE GLENEAGLES HOTEL

Colliers International acts for The Gleneagles Hotel. Please find enclosed completed representations in relation to the Perth and Kinross Local Development Plan Proposed Plan consultation.

If you require any further information, or wish to review any aspect of these representations, or references to previous submissions made on behalf of the hotel in respect of the comments being made, then please contact me in the first instance.

Please can you acknowledge safe receipt of the representations.

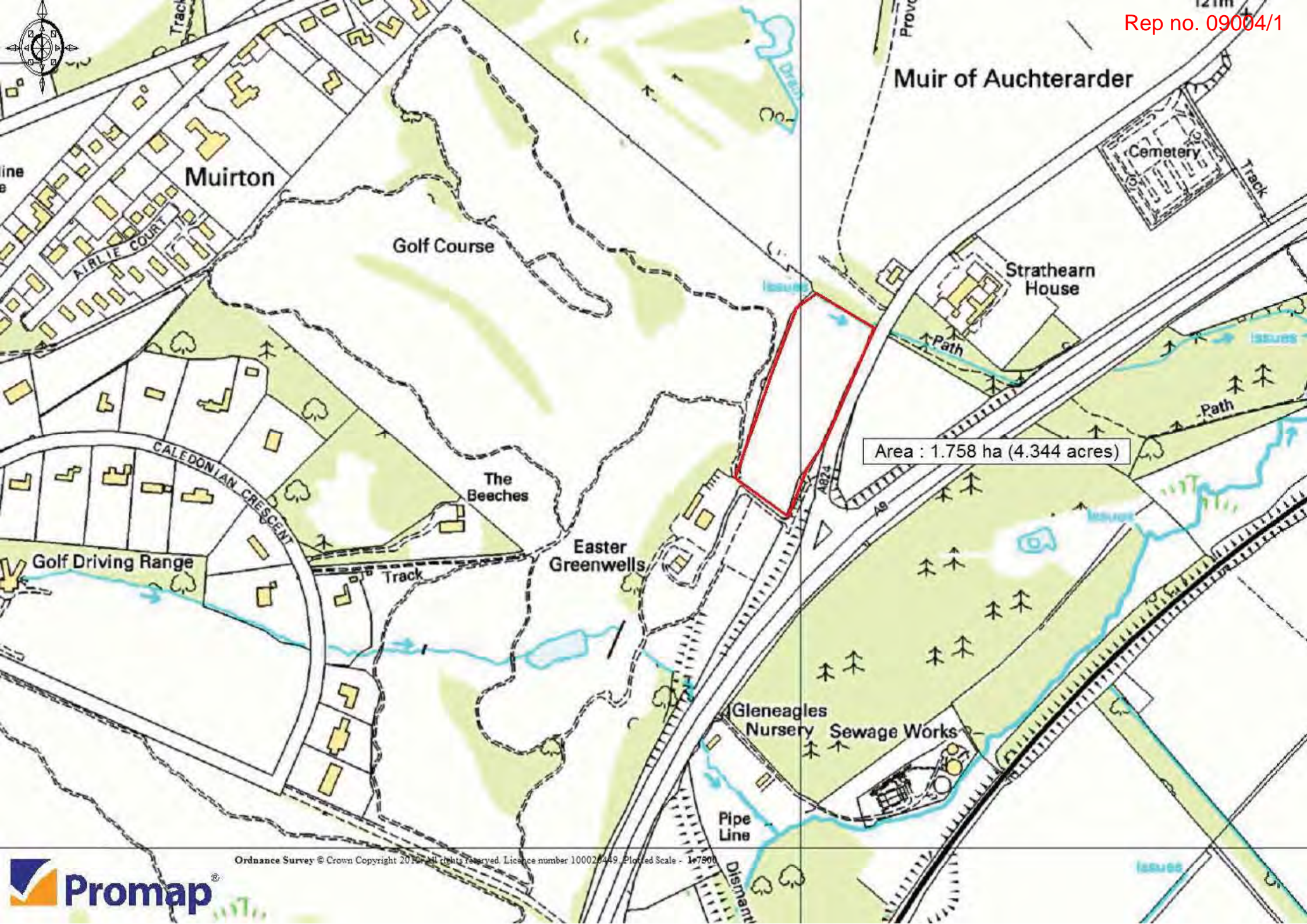
Yours sincerely



NEIL GRAY MRTPI
Associate Director

Enc. Representation forms (8 no.) and red line boundary plan for Turf Fields

cc. Bernard Murphy, General Manager, The Gleneagles Hotel



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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.	ED5 – Major Tourism Resorts	or			
Site ref.		or			
Chapter	3	Page no.	28	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.

Support Policy ED5 as it provides positive encouragement to existing businesses to formulate or implement asset management plans at these particular locations.

Policy ED5 is also supported for its emphasis about protecting the resort facilities' landscape setting, which it is quoted in the plan "is integral to their tourism offer will be protected from developments with the potential to adversely impact upon it".

Policy ED5 sends out a very positive message about the value placed by the Council and the community at large, about the resorts as visitor attractions and economic development assets for Perth and Kinross and the wider economy. Not only does it demonstrate how the Council values the resorts as assets themselves which may need to change and grow over time; it also underlines the value the Council attaches to these resorts which must also be protected from inappropriate development affecting the resorts themselves, e.g. managing the setting or amenity of the resort itself.

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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.	Policy RD6 – Particular Needs Housing Accommodation	or			
Site ref.		or			
Chapter	3	Page no.	33	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.

Change - the hotel wishes to see an additional reference in the category a) list to include "key-worker accommodation".

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

The hotel generally agrees with the emphasis of Policy RD6 which supports proposals for particular needs housing and accommodation. However, the hotel wishes to see additional reference in the category a) list to include "key-worker accommodation". This is considered to be a relevant category of particular needs housing accommodation that is unique to Perth and Kinross Council's major tourism resorts, as per Proposed Plan Policy ED5.

In the objector's case, the hotel employs over 500 staff, many being residents from within the locality (Auchterarder or wider Strathearn area). However the hotel also provides key worker accommodation on site, where it is required. This enables staff to be available, reduces the need to travel and further contributes to the local economy through their accessing local services and facilities. This arrangement helps promote sustainability by reducing travel to work and retaining spend on local services in Auchterarder and surrounds.

Consequently, the Gleneagles Hotel considers that tourism and or business growth proposals (such as those brought forward in future under Proposed Plan Policy ED5) should also be encouraged to make provision for accommodation of their workforce, through dedicated staff accommodation. In this way the hotel considers that it would have a positive impact on the wider housing market in the Auchterarder area - as burdens would be reduced on local accommodation such as the disproportionate cost of homes or the availability of the right types of homes were its hotel staff accommodated in specific needs accommodation.

These measures could be addressed if criteria a) of Policy RD6 were to be expanded to provide support for "key-worker accommodation".

Key-worker accommodation at resorts, would reduce the need to travel from outwith the area, encourage non motorised travel, encourage best use of available land and deliver improved infrastructure as a result.

Gleneagles Hotel promotes the Turf Fields proposal (See Representation 7) as an example of "key worker accommodation" proposed as part of resort growth plans consistent with Proposed Plan Policy ED5 (Major Tourism Resorts). If the Turf Fields proposal were to be advanced as "key worker accommodation" then the resultant positive impacts to the local housing stock and amenity would be:

- provision of additional key-worker accommodation
- free's up additional housing stock to the wider private housing market in Auchterarder and surrounds
- free's up the hotel's existing real estate attached to the hotel itself, allowing for enhancement and improvement of the property that would be consistent with the Proposed Plan Policy ED5.
- New key-worker accommodation at Turf Fields would "fit" into the undulating topography - the new accommodation would be low rise (as opposed to high rise currently) and make for a better quality of residential amenity for key-workers and would therefore not be visible or prominent and detract from the area's visual quality
- The Turf Fields site (see Representation 7) is proposed for future temporary development associated with the infrastructural requirements of the forthcoming Ryder Cup 2014 event (car parking). It would therefore be developed and subsequently left vacant upon close of the Ryder Cup 2014 event.

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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.	HE4 – Gardens and Designed Landscapes	or			
Site ref.		or			
Chapter	3	Page no.	39	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.

Support Policy HE4 because it is important to attract new and retain existing visitors to Perth and Kinross who value the integral role that Gardens and Designed Landscapes offer in terms of the wider landscape and cultural setting of places.

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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.	ER6 – Managing future landscape change	or
Site ref.		or
Chapter	3	Page no. 49 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.

Support Policy ER6 because in addition to designated national and local landscapes, the hotel considers that non-designated landscapes also carry value, which must be managed, and if necessary, protected from inappropriate development.

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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.	Strathearn Area spatial strategy	or			
Site ref.		or			
Chapter	8	Page no.	241	Paragraph no.	8.1.17

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.

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

Support Strathearn Area Spatial Strategy, subtext comment about Tourism – particularly the Proposed Plan's emphasis of seeking to protect and enhance tourism developments at Crieff Hydro, Gleneagles Hotel, Taymouth and g-West.

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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.	Local Development Plan Key Objectives (Vision&Objectives)	or			
Site ref.		or			
Chapter	2	Page no.	18	Paragraph no.	2.3

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.

Support the Key Objective under “Place” with reference to “Protect and enhance the character, diversity and special qualities of the area’s landscapes to ensure that new development does not exceed the capacity of the landscape in which it lies”.

The Gleneagles Hotel is a major economic development asset for Perth and Kinross and the wider economy. This has been, and will continue to be rooted in the hotel’s landscape setting, which has attracted visitors from across the world.

The Hotel wishes to emphasise that although the hotel sits within the Gleneagles Historic Garden and Designed Landscape (HGDL) designation, it considers that high landscape setting value ought to be placed equally upon places where there is no formal landscape designation, especially where it can be demonstrated that these places are at the core of attracting visitors from across the world, thereby boosting the area’s tourism and wider supply-chain economy.

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Policy ref.	Strathearn Spatial Strategy - Gleneagles	or			
Site ref.		or			
Chapter	8	Page no.	267	Paragraph no.	8.11.2

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.

Support for the Spatial Strategy Considerations on page 267

The hotel is encouraged by the positive support and encouragement emphasised in the Proposed Plan in relation to the text "Tourism plays an important role in the settlement and is a major provider of employment opportunities, particularly at the Gleneagles Hotel, which is specifically identified for its contribution to the provision of visitor accommodation. The Plan seeks the retention and expansion of this important economic driver within the Strathearn area".

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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	The Gleneagles Hotel
Address and Postcode	c/o Colliers International, 39 George Street, Edinburgh, EH2 2HN
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	Strathearn Area Spatial Strategy Considerations - Gleneagles	or			
Site ref.		or			
Chapter	8	Page no.	267	Paragraph no.	8.11.2

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.

Change the third paragraph of 8.11.2 of the Spatial Strategy Considerations - Gleneagles. The last sentence of the same paragraph 8.11.2 should be amended to reflect an important protection requirement, to read:

“The Plan also seeks to protect the immediate village setting around Gleneagles Hotel, including an area of open space to maintain the character and amenity of the settlement...”

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

The Gleneagles Hotel is seeking a change to the third paragraph of the Spatial Strategy Considerations - Gleneagles. Whilst there is support for the Plan's statement at the third paragraph about the village being included in the Garden and Designed Landscape relating to the Gleneagles Hotel, the hotel is of the view that there is a need to ensure that the hotel, its grounds and most importantly, its setting, is protected from development that may be to the future detriment of the overall quality of the hotel and its image as a location of high environmental quality.

Therefore, the hotel requests the last sentence of the same paragraph be amended to reflect this important protection requirement, to read:

“The Plan also seeks to protect the immediate village setting around Gleneagles Hotel, including an area of open space to maintain the character and amenity of the settlement...”

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

Name	Persimmon Homes East Scotland
Address and Postcode	c/o Colliers International, 39 George Street, Edinburgh, EH2 2HN
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

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

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

Change proposed housing capacity number for Proposal H46 from "125" to "100" units.

Include in 'Site Specific Developer Requirements' (page 205, table H46) to: "undertake development of a masterplan through consultation with the Community and Council submitted at the time of a planning application"

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

Supporting document Appendix 8- "Residential Development Site Comparison MIR Sites H47 & OP16 (Lathro Farm) and H46 (Lands between the M90 and West Kinross)" April 2012 prepared by Brindley Associates accompanying this submission outlines Persimmon Homes' views about Proposal H46 - West Kinross.

In principle, Persimmon Homes does not object to the identification of Proposal H46 as a housing proposal as there is an acknowledgement that the plan needs to identify a number of sites in strategic locations to meet the plan's housing land requirement.

Persimmon Homes questions PKC's proposal for this site to deliver a greater number of houses within the plan life (H46 current proposed 125 units in the plan life), than Proposal H47 (current 120 units in the plan life); or other sites in the Kinross HMA.

Site H46 is not in control of a house-builder and thus one could question the effectiveness of delivery of the site within the plan life. If the plan is to meet national and SDPA housing land policy requirements then there must be greater certainty and weight attached to sites that are capable of delivery in the plan period, or face the consequences of under-provision, which in turn may threaten the implementation strategy which includes provision of much needed infrastructure improvements in Kinross.

The supporting document also compares the effectiveness of sites H47 and H46 in relation to their position and location close to the M90, where it has been established, noise mitigation measures would be necessary to reduce adverse impact on residential amenity. Whilst it has been demonstrated both sites can accommodate the necessary noise attenuation measures on-site, the effectiveness of H46 as a site for development must be questioned in terms of its scale, shape and form to deliver a residential environment consistent with national policy on place-making (Designing Places and Designing Streets) and at the density and capacity proposed.

The net effect of our comparison of the wider benefits of delivering H46 and H47 is that there is limited additional community benefit being provided by H46 beyond structural planting and screening to the M90. Whereas site H47 is offering over 20 hectares of new community woodland and wetland with path network and connections between the two towns; space for new play and community facilities within the development and improved access from the South Street/A922 lying opposite the community campus.

In relation to the 'Site Specific Developer Requirements', Persimmon Homes would wish consistency of approach by PKC to the list of requirements. As has been explained, H46 is currently proposed to deliver a 'larger housing development' than H47 within the plan life. In terms of the scale of the proposal, a planning application for either of the sites would classify them as 'major development'. The Development Management Regulations would require such applications to be subject to Pre-Application Consultation and additional community consultation practice. Therefore it would be both logical and fair for identical developer requirements relating to masterplanning and community consultation/participation to be requested for both proposals.

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Name	Persimmon Homes East Scotland
Address and Postcode	c/o Colliers International, 39 George Street, Edinburgh, EH2 2HN
Telephone no.	[REDACTED]
Email address	[REDACTED]

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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"/>			or	
Chapter	4- Spatial Strategy	Page no.	64	Paragraph no.	4.3.10 "windfall"

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.

Change the wording of the paragraph 4.3.10 describing the Council's approach to windfall as a contributor to the overall supply. The change sought is to the last sentence to reflect a more flexible approach to windfall allowance, reworded to state:
 "It is expected that in Perth and Highland HMAs, more than 10% of the land supply will be met by windfall sites. In all other HMA areas, windfall will be examined in terms of the contribution to flexible land supply in circumstances where allocated development plan sites in these HMAs can demonstrate an ability to provide increased supply from identified sites themselves".

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

The reason for requesting the change is because if the LDP allocates sufficient sites in the right places, there is less likelihood of developers seeking out windfall opportunities. We accept that there will always be an element of windfall and would recommend that either ZERO or 5% be allowed for in the calculations.

This will also ensure that a 'generous' supply of sites are allocated, and plan-led. We would also direct PKC to PAN 2/2010 para 62. Windfall sites 'are not counted towards meeting the housing land requirement' They should be seen as a bonus, over and above the allocated sites, and will contribute to the 'generous' supply required by Scottish Government.

The Proposed Plan states on page 67 under 'Greenfield land and housing density', "Scottish Government guidance and good planning practice encourage new development to utilise brownfield land where possible. However, the availability of brownfield sites in PKC is extremely limited. As a result, much of the pressure for new development will be accommodated on greenfield land around the towns and villages of the area"

The Housing Needs and Demand Assessment (HNDA) and the Main Issues Report of the plan state that Perth and Highland have the largest contribution towards supply from windfall sites. Therefore, the assumption for 10% of the overall land supply across PKC is not appropriate and should be varied across the different HMA's with higher allowances in Perth and Highland HMAs and lower OR ZERO allowances across Strathearn, Kinross and Strathmore and the Glens HMAs.

By reducing the windfall proportion downward of 10% in HMAs with all their allocations on greenfield sites (all HMAs except Perth and Highland) this would prevent developers from seeking out future sites not allocated in the plan, which could result in creating undue uncertainty for communities. A plan-led approach is essential.

Persimmon makes further comment about the effect of this proposed change, in relation to how allocated sites can help meet the housing land requirement, without the need for windfall, and without compromising the development site's residential amenity or landscape impact in the submitted documents accompanying this representation.

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Name	Persimmon Homes East Scotland
Address and Postcode	c/o Colliers International, 39 George Street, Edinburgh, EH2 2HN
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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.	OP 16 - Stirling Road	or			
Chapter	7	Page no.	209	Paragraph no.	Proposals map

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.

Remove Op16 Proposal and change land in control of Persimmon Homes to new housing allocation Proposal Hx (refer to accompanying Appendix 1 Indicative Landscape Masterplan document showing ownership and proposals for this land)

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

In its current form, the OP16 proposal is described on page 208 as a 3.8Ha site allocated for employment use and residential on no more than 75% of the site.

Within the OP16 proposal boundary shown in the Proposed Plan, land in control of Persimmon Homes (about 0.6Ha accessed from Fleming Court) shown in the submitted concept masterplan, is identified as a housing allocation H5, with indicative high density capacity for 27 affordable housing units, in the adopted Kinross Area Local Plan (2004) (KALP).

Also within the OP16 proposal boundary shown in the Proposed Plan is land in control of a 3rd party, which is currently identified in the KALP as existing industrial business site (Policy 71).

Persimmon Homes, as a developer and house-builder, committed to delivery of the KALP H5 allocation does not support the current proposal to 'join together' the two land use proposals. This in effect brings two landowners / developers together; raises issues about delivery and timing. It also raises issues about compatibility of uses, which it has been shown in the information provided in support of these representations, how noise impact can be adequately mitigated (such as acoustic barrier/landscaping between the proposed housing and industrial estate).

There is concern about the re-generation capability of the existing industrial estate at Stirling Road (identified in KALP as an existing industrial business site). It is not clear from the plan whether the site would be re-developed or whether it would be re-marketed and enhanced given that the site is described as "The buildings at Stirling Road may not be fit for purpose to meet future employment needs". Persimmon Homes is not satisfied with the overall approach to the proposed allocation.

Persimmon Homes would prefer that the existing KALP H5 allocation is simply brought forward into the new Local Development Plan as a housing proposal. This can be achieved by:

- identifying a new housing proposal Hx and allocating that land in control of Persimmon for affordable housing at a high density capacity of 30 units.; OR
- include the KALP H5 allocation within the Local Development Plan Proposal H47 as shown in Persimmon's Appendix 1 Indicative Landscape Masterplan and revise the number of housing units and explanation of delivery requirements for affordable housing arising at the Lathro Farm site.

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Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="198"/>	Paragraph no.	<input type="text" value="7.1.8 'Housing'"/>

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.

At "Housing" Change to the wording of the first sentence of paragraph, which states "TAYplan has identified that in order to provide housing to accommodate projected population increases approximately 70 houses will be required per year". Change the figure quoted from 70 to "80 houses will be required per year".

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

The reason for requesting the change is because the Reporter currently conducting the TAYplan SDP examination, has identified an issue relating to the scale and distribution of housing in relation to SDP Policy 5: Housing.

In his letter to TAYplan dated 7th February 2012, under Issue 15 (Appendix 2 for reference), he requests TAYplan authority's view about the impact on the plan's strategy, Environmental Report and other studies, in the event that build rates are projected to be higher than the levels used by TAYplan in preparing the SDP.

In their response, by letter dated 27th February 2012, (Appendix 2 for reference), TAYplan discuss the distribution of average annual housing market build rates. TAYplan confirm the figures were projected on the basis of General Register of Scotland (GROS) 2006 population and household projections. The Reporter has queried what impact, if any, would be the result of projecting GROS 2008 population and household figures. In his view, the Reporter had asked TAYplan to comment on an upward increase in build rates. In the case of Kinross Housing Market Area, this was requested for a level of 70 increased to a level of 80 (i.e. 10 units per year increase in build rate).

The requested change to para 7.1.8 "Housing" reflects the effect of the proposed TAYplan changes mooted by the Reporter. When applying the increased build rate for Kinross HMA and allowing for the PKC proposed adjustments ((10% shift to neighbouring HMAs), except for 10% windfall allowance which Persimmon is seeking change), the net effect is an increase in the housing land requirement from 980 to 1,098; and the overall net result being an increase in additional allocations required from 662 to 780 units i.e. 420 additional houses over and above the Plan requirement of 360.

Therefore the LDP Housing Land Strategy should reflect the Reporter's suggested changes, subject to final report of Examination and the approval of Scottish Ministers of the findings of the SDP itself.

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

Developer Contributions Supplementary Guidance (Dec 2011)

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

Policy ref.				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.

Ensure there is a clear link established between LDP Policy PM3 Infrastructure Contributions and the Supplementary Planning Guidance (SPG).

Delete paragraph 3.14

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

In principle Persimmon supports the broad assumption that developers should be required to remediate the impacts of their developments in order to make them acceptable in planning terms.

However Persimmon considers the use of Planning Agreements under Section 75 of the Town and Country Planning (Scotland) Act 1997 has been extended beyond the scope of the tests of planning purpose, relationship to the development, scale and kind and reasonableness set out in Circular 1/2010.

Persimmon considers the methodology to calculate the impact of new development on infrastructure and services should have regard to the net new impact, not simply total impact.

Paragraph 3.14 is not acceptable to Persimmon and should be deleted: 'There are times where it may be appropriate to require additional revenue costs from developers.' The SPG provides some guidance about the type of additional revenue costs e.g. paying for a subsidised bus service or part funding of a community development worker.

It is not appropriate for housing developments, or other land uses, to subsidise private enterprise.

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Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="2"/>	Page no.	<input type="text" value="20"/>	Paragraph no.	<input type="text" value="2.4.5"/>

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.

At the section, on page 20 para 2.4.5 beginning “Demographic Change” - Persimmon wish to see:
Change the second paragraph of the “Demographic Change” section.

That paragraph refers to how TAYplan has adopted the Scottish Government’s 2006 based population and household projection. Persimmon suggests the Proposed Plan adopts, at least, the Scottish Government’s 2008 based population and household projection (GROS 2008).

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

The reason for requesting the change is because the 2006 based figures are now out-of-date, a weakness of the strategic requirement proposed in TAYplan, which has been flagged-up by the Scottish Minister’s appointed Reporter examining TAYplan (the Strategic Development Plan).
(See attached correspondence Appendix 2, between TAYplan, DPEA and Persimmon Homes).

Planning for growth does not automatically mean that it will happen. However, a clear message can be sent to the industry that PKC is ‘open for business’.

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05 April 2012

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

By email to: developmentplan@pkc.gov.uk

Dear Sir / Madam

**PERTH AND KINROSS LOCAL DEVELOPMENT PLAN:
PROPOSED PLAN CONSULTATION**

REPRESENTATIONS ON BEHALF OF PERSIMMON HOMES EAST SCOTLAND

**PROPOSAL H47 – LATHRO FARM, KINROSS
PROPOSAL OP16 – STIRLING ROAD, MILNATHORT**

Colliers International acts for Persimmon Homes East Scotland. Please find enclosed completed representations (Nos 1-13) in relation to the Perth and Kinross Local Development Plan Proposed Plan consultation.

The representations should be considered alongside the enclosed supporting documents:

- Lathro Farm, Kinross: Indicative landscape masterplan (Brindley Associates) April 2012
- Access Review, Lathro Farm Kinross (Fairhurst) April 2012
- Noise Assessment for Sites H47 and OP16 (Charlie Fleming Associates) March 2012
- Comparative site assessment of Sites H47, OP16 and H46 (Brindley Associates) April 2012
- Flood survey update map (Kaya Consultants) April 2012
- Indicative proposals for SUDs and drainage (Fairhurst) April 2012
- Calculations in relation to the Housing Land Requirement (Colliers)
- Correspondence between TAYplan, DPEA and Persimmon Homes in relation to the TAYplan Examination February/March 2012

This is because the submissions set out justification and demonstrate why the requested changes to the Proposed Plan should be accepted.



If you require any further information, or wish to review any aspect of these representations, or references to previous submissions made on behalf of Persimmon Homes East Scotland in respect of the comments being made, then please contact me in the first instance.

Please can you acknowledge safe receipt of the representations.

Yours sincerely



NEIL GRAY MRTPI
Associate Director

Enc. Representation forms (13 no.) and supporting documents

cc. Iain McGouldrick, Persimmon Homes East Scotland

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

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Email address	[REDACTED]

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Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text" value="Proposal H47"/>	or			
Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="205"/>	Paragraph no.	<input type="text" value="H47 Lathro Farm"/>

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.

Change to site capacity number from 220 (120 up to 2024) to "a range 320-350 (220 up to 2024)"

Change 2nd sentence of same table which reads "Development of this site will be in phases with 120 in the life of the plan" to read:

"Development of this site will be in phases with 220 in the life of the plan"

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

The accompanying indicative landscape masterplan (Appendix 1), and Colliers document reports the reasons why it is considered the site can deliver a higher capacity of development and why it is considered appropriate to do so.

Persimmon Homes has demonstrated in the accompanying documents how further refinement to the previously submitted proposals, based on careful examination of flood risk, noise attenuation, drainage requirements, access to the site, accessibility of the site to key services and scale of the land to accommodate these constraints and mitigations has produced a net result of a higher capacity development. Persimmon considers the development can accommodate in the range of 320-350 houses within the net development area, based on a medium density of development. This approach is consistent with Scottish Government guidance in Designing Places and Designing Streets policies which encourages development which is highly accessible, and where the landscape capacity and other environmental issues allow, to be more dense where appropriate.

With respect to the strategic housing land requirement, it has already been argued in these representations, how TAYplan as it currently stands, does not provide for a generous supply of housing land; nor will it plan for population and housing growth to meet the most up to date GROS 2008 population and housing projections. It has also already been argued that planning guidance does not support the method of including a 10% allowance for windfall sites in calculating housing land requirement. The combination of these matters, brings Persimmon Homes to the view that there will be a higher housing land requirement across PKC, including Kinross HMA.

PKC has acknowledged that it must provide the plan's housing land requirement mostly from greenfield sites. PKC has also already acknowledged that a modest increase in the housing land requirement will not adversely impact on the environmental capacity of the area to accommodate the increase.

As a major housebuilder in control of the site, Persimmon Homes believes it can deliver a greater capacity of houses to meet the planning policy guidance across a range of housing types (from lower density family homes (detached/semi-detached) to higher density closer to the main access and community facilities. As a greenfield site, Persimmon Homes also believes it makes good planning for the future to provide the right number of new homes, at a sustainable level of development (scale and phasing) to ensure the most efficient use of greenfield land rather than require PKC to seek additional new housing sites on greenfield. Persimmon Homes also believes that the scale of development being proposed is the only way to ensure long-term delivery of the necessary infrastructure improvements and changes to the Kinross HMA. There must be a balance struck between the number of houses required to protect and sustain the environment and residential amenity, with the number of houses required to help PKC deliver its strategy and for the developments themselves (with developers and partners) to deliver the infrastructure at the scale required.

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Chapter	<input type="text" value="7"/>	Page no.	<input type="text" value="205"/>	Paragraph no.	<input type="text" value="Table H47 Lathro F"/>

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.

Change the following "Site Specific Developer Requirements" listed in Table Ref H47:

Fifth bullet: Remove "Gallowhill Road" from the required road connections. Change "Lathro Land" to read "Lathro Lane (emergency access)"

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

The accompanying concept masterplan, and reports outline the reasons why it is considered the fifth bullet of site specific developer requirements must be changed.

Appendix 7 of the submission outlines a further access review undertaken by Fairhurst which has examined PKCs proposal for three access points to be established, particularly the proposal to form an access from Gallowhill Road.

Fairhurst has concluded that owing to physical landform constraints (Gallowhill Road falls to change in gradient to the north and south of the road) making the engineering of an access unviable. Gallowhill Road is also poorly sighted by existing resident's parked cars making any new access potentially unsafe.

Fairhurst has also concluded that the Roads Authority guidelines do not require developments of the proposed scale to have more than one road access. Therefore it is proposed that Lathro Lane is identified as a secondary 'emergency access' as has been proposed in the accompanying indicative landscape masterplan document (Appendix 1).

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Policy ref.	<input type="text"/>	or			
Site ref.	Proposal H47 Lathro Farm, Kinross	or			
Chapter	7	Page no.	198	Paragraph no.	7.1.14 Table of prop

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 allocation of Proposal H47. However change entry on table on page 198 for Proposal H47.

Change no. of units from "220" to "320-350"

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

The reason for seeking this change is explained in the accompanying Appendix 1 and supporting submissions (Colliers International April 2012) submitted in support of Proposal H47 Lathro Farm.

The documents demonstrate a number of areas where it is considered the capacity of Proposal H47 can be increased, without compromising the Plan's housing land strategy or spatial strategy of TAYplan. Nor would the proposed change be to the detriment of the capacity of the landscape to accommodate the increase, or would it result in reduction in residential amenity or adverse environmental impact.

The accompanying indicative masterplan (Appendix 1) demonstrates how the site capacity can be increased without detriment to the Plan's policies:

- The Strategic Housing Land Requirement should be modified, and revised upwards to reflect GROS 2008 projections. This results in a greater housing land requirement for the Kinross HMA
- In acknowledging the lack of large scale brownfield sites, and the fact that PKC needs to find a generous supply of greenfield sites, Proposal H47 can provide a higher density of development, to increase the capacity from PKC's Proposed Plan suggesting circa 220 units (120 in the life of the plan, rising to 220 by 2024), to a revised capacity of 220 units in the life of the plan, rising to 320-350 units by 2024. This is based on the following flexible characteristics of the site all under one developer's ownership as documented in the accompanying Concept masterplan documents:

- 13Ha of land can accommodate houses allowing for on-site provision of drainage and other infrastructure.

- the form and layout of the development site, as demonstrated, allows for higher density development nearer to the main road and footpath network linking town and countryside and neighbouring residential areas. The Persimmon proposals apply the Proposed Plan density ratio for medium density, at a rate of 25 units per hectare. At 13 hectares this would result in a capacity of 325 units. Persimmon is proposing a range within that figure of 320-350 units. Of these units, Persimmon is proposing 220 units can come forward within the life of the new plan.

- the net development area and layout/design of the site has been adjusted after closer examination of the form and topography, watercourses and noise attenuation requirements of the site. This has enabled a more efficient and effective site layout to demonstrate all the requirements of good planning practice can be accommodated in the site, subject to presentation of a planning application in future.

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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.

Change to Kinross/Milnathort Proposals Map, Proposal H47

Change the housing Proposal H47 boundary to reflect the development boundary illustrated in the accompanying Appendix 1 Indicative Landscape Masterplan.

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

The reason for seeking a change to the development boundary of Proposal H47 is because:

The current proposed boundary does not account for site specific characteristics (constraints and opportunities) which have been examined in detail by Persimmon's consultants. Persimmon has undertaken further detailed site assessment and applied good planning practice to produce a refined site design layout, see Appendix 1 Indicative Landscape Masterplan and supporting documents.

The Appendix 1 Indicative Landscape Masterplan submitted in support of these representations, shows how study of the topographical features of the site have identified potential areas for drainage attenuation (Appendix 6), and mitigation against flood risk (Appendix 6). Noise assessment work undertaken (Appendix 4) has also determined acceptable limits for locating houses that may be impacted by the nearby M90 motorway which has enabled the masterplan to incorporate design for mitigating potential noise impacts. This has allowed a refinement to the landscape structure proposed for the site, and the ensuing proposals for a major community woodland and open space resource.

The net effect of these further studies and masterplan refinements is a more effective design which responds to the site's constraints and opportunities.

The revised boundary for Proposal H47 would therefore enable a properly planned, and designed future development based on key principles of place-making and masterplanning.

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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Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="4 Spatial Strategy"/>	Page no.	<input type="text" value="65-66"/>	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.

In the "Housing land strategy" section seek change to the TAYplan annual build rates identified on the diagram titled "TAYplan average annual LDP build rates".

The rates should mirror the annual build rates suggested by the Reporter conducting the examination of the TAYplan SDP. The Reporter has indicated for Kinross the change should be from "70" to "80".

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

The reason for requesting the change is because the Reporter currently conducting the TAYplan SDP examination, has identified an issue relating to the scale and distribution of housing in relation to TAYplan Policy 5: Housing.

In his letter to TAYplan dated 7th February 2012, under Issue 15 (See Appendix 2 of this submission for reference), the Reporter requests TAYplan authority's view about the impact on the plan's strategy, Environmental Report and other studies, in the event that build rates are projected to be higher than the levels used by TAYplan in preparing the SDP.

In their response, by letter dated 27th February 2012, (See appendix 2 for reference), TAYplan discuss the distribution of average annual housing market build rates. TAYplan confirm the figures were projected on the basis of General Register of Scotland (GROS) 2006 population and household projections. The Reporter has queried what impact, if any, would be the result of projecting GROS 2008 population and household figures.

In the Reporter's view, he had asked TAYplan to comment on an upward increase in build rates. In the case of Kinross Housing Market Area, this was requested for a level of 70 increased to a level of 80 (i.e. 10 units per year increase in build rate).

Therefore the LDP Housing Land Strategy should reflect the Reporter's suggested changes, subject to final report of Examination, and the approval of Scottish Ministers of the findings of the SDP itself.

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Chapter	<input type="text" value="4 - Spatial Strategy"/>	Page no. <input type="text" value="67"/>	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.

Change the table showing “TAYplan 2010-24 requirement Effective Housing Land supply shortfall” to better reflect the Reporter’s identified update to TAYplan Policy 5/Proposal 2 in the Proposed Plan.

Persimmon has provided its own indicative review of the figures in the accompanying document by Colliers setting out proposals for housing Proposal H47. Within that, a case is advanced and appropriate numbers suggested (in Appendix 3)

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

The Housing requirement 2010-2024 column and the Additional houses required column should be updated to reflect the position of TAYplan’s housing scale and distribution Policy 5/Proposal 2 in the Proposed Plan which is being examined by the appointed Reporter.; who has sought clarification of TAYplan about the application of GROS 2008 population and household projections, as opposed to the 2006 figures applied by the TAYplan authority.

For Perth and Kinross, the Reporter is suggesting an increase of 130 units per annum should the GROS 2008 figures be used. This relates to a +10 housing unit annual increase in the Kinross Housing Market Area.

The relevant period for the housing requirement should also be updated to coincide with the relevant TAYplan period of 2012-2032.

These changes assume the same figures of the Effective Supply at March 2011 audit are unchanged, however we would anticipate the Effective Supply at March 2012 or at the time of adoption of the LDP, these figures will change to reflect the most up to date position.

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Site ref.	<input type="text"/>	or			
Chapter	4 - Spatial Strategy	Page no.	67-68	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.

At "Greenfield land and housing density" suggest change:

Change to the wording of the last sentence of paragraph one, which states "This can be achieved through higher density development but this must not be at the expense of good design".

Change sentence to read "This can be achieved through higher density development where it can be demonstrated this is compatible with the form and layout of the settlement and has high accessibility to local services".

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

Persimmon Homes supports the Plan's section covering "Greenfield Land and Housing Density" in general terms. It supports the realisation of the Council that to deliver the future housing land requirement, will require significant amount of development from greenfield land.

The Council also recognise the finite resource quality of most greenfield land and therefore it is welcomed that there is an emphasis in the plan based on achievement of higher density development, which must not be at the expense of good design.

However, the Council has stated the lack of available brownfield sites in PKC and that it must release sufficient greenfield land to meet the TAYplan requirement.

In line with Scottish Planning Policy, paragraph 80 begins with "Planning authorities should promote the efficient use of land and buildings". In the case of many sites allocated in the Proposed Plan, within the principal settlements, such as Kinross it is argued it would be efficient use of greenfield land to encourage increased densities particularly where this may be compatible with the form and layout of the settlement and be of high accessibility.

SPP paragraph 83 advises "The density of new development should be determined in relation to the character of the place and its relative accessibility, with higher densities appropriate at central and accessible locations. Through good design it is possible to achieve higher density living environments without overcrowding or loss of amenity." Persimmon has submitted an indicative landscape masterplan (Appendix 1), further supporting information to demonstrate Proposal H47's ability to address noise, flood risk, accessibility, provision of major landscape and open space with woodland and wetland provision all located on a highly accessible main public transport route, to accommodate a higher density development.

Rather than adhere to the flexible density ranges as outlined in the Proposed Plan at page 68, where flexibility within the range would be assessed on a 'case by case' basis, Persimmon Homes wish that the plan encourages future development, via planning applications and/or development briefs for sites, where it will be up to the developer to demonstrate and justify any reasoning for the application of higher densities, guided by national policies such as Designing Streets (2010) and Designing Places (2009). These reasons should be made in relation to the character of the place and its relative accessibility.

In relation to a settlement such as Kinross and the proposed allocations of housing land in the plan at this settlement (Proposals H47, H46) these allocations are located on the edge of the town, adjacent to relatively new (medium density) suburban housing (if compared against the table on page 68 of the proposed plan). However the sites are highly accessible to the services and facilities of the town centre, and also in the case of Housing Proposals H47 in particular, this is located closer to the new community campus at Lethangie, comprising essential services close to the future development. It is therefore the view that Proposal H47, by virtue of its proximity to services and high accessibility can demonstrate that application of a higher density (medium) would not result in overcrowding or loss of amenity. The concept masterplan documentation submitted with these representations demonstrates the opportunity provided by the site Proposal H47 to offer this flexibility and retain the residential amenity and design without compromise.

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Address and Postcode	c/o Colliers International, 39 George Street, Edinburgh, EH2 2HN
Telephone no.	[REDACTED]
Email address	[REDACTED]

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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.	Proposal H57	or			
Chapter	4	Page no.	293	Paragraph no.	Proposal Map (Crieff)

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.

Change to Crieff Proposals Map, Proposal H57

Change the housing Proposal H57 boundary to reflect the development boundary illustrated in the accompanying Development Framework document prepared by HarrisonStevens.

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

The reason for seeking a change to the development boundary of Proposal H57 is because:

The current proposed boundary does not account for site specific characteristics (constraints and opportunities) nor does it accurately reflect the land in control of TWUK Ltd or the third party owners to the east. TW has undertaken detailed site assessment and applied good planning practice to produce an outline design to examine form and layout of the site.

The Development Framework document (HarrisonStevens) submitted in support of these representations, shows how further land in control of TW UK would not be constrained by topographical or landscape and visual impacts and how accessibility is high at this location, allowing Designing Places and Designing Streets policies to be applied to increase density.

The revised boundary for Proposal H57 would therefore enable a properly planned, and designed future development based on key principles.

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

Policy ref.	<input type="text"/>	or			
Site ref.	Proposal H57 - Wester Tomaknock	or			
Chapter	8	Page no.	240	Paragraph no.	8.1.14

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 Proposal H57 as a housing site at Wester Tomaknock, Crieff.

However Taylor Wimpey UK wish to see change to Table on page 240 listing proposed housing sites and indicative capacities.

Change H57 Wester Tomaknock from 60 units to a range of 100-120 units.

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

The reason for seeking this change is explained in the accompanying Development Framework document prepared by HarrisonStevens, submitted in support of Proposal H57 Wester Tomaknock.

The document demonstrates a number of areas where it is considered the capacity of Proposal H57 can be increased, without compromising the Plan's housing land strategy or spatial strategy of TAYplan. Nor would the proposed change be to the detriment of the capacity of the landscape to accommodate the increase, or would it result in reduction in residential amenity.

The accompanying Development Framework document demonstrates how the site area can be expanded to larger than the Plan's proposed developable area of 4ha, which in turn can enable a higher capacity of units, without detriment to the Plan's policies:

- The Strategic Housing Land Requirement should be modified, and revised upwards to reflect GROS 2008 projections. This results in a greater housing land requirement
- In acknowledging the lack of large scale brownfield sites, and the consequence that PKC needs to find most of its supply from greenfield sites, Proposal H57 can provide a higher density of development, to increase the capacity from circa 60 units, to a range of around 100-120 units, this is based on the following flexible characteristics of the site/land ownership as documented in the accompanying Development Framework:

- the net developable area of the site in control of TWUK and of the third party neighbour is measured to be larger than PKC has indicated, this offers a larger development site to work with.
- even allowing for strengthened edges through landscaping and open space provision, the available land in control of TW is not constrained in terms of topography or limits of acceptable landscape capacity as demonstrated in the supporting document
- a larger gross land area provided, can ensure more infrastructure to support and deliver the development without the need to find additional new greenfield sites
- the form and layout of the development site, as demonstrated, allows for higher density development nearer to the main road and footpath network linking town and countryside and neighbouring residential areas
- the development area has been adjusted after closer examination of the form and topography, watercourses and natural biodiversity of the area, and allowing formation of a new access - this has enabled a more efficient and effective site layout to demonstrate all the requirements of good planning practice can be accommodated in the site, subject to presentation of a planning application in future.

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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" value="Proposal H57"/>	or			
Chapter	<input type="text" value="8"/>	Page no.	<input type="text" value="251"/>	Paragraph no.	<input type="text" value="Table H57"/>

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.

Change to Site size from 5.6Ha to 10.2Ha

Change to site capacity from 60 to "a range 100-120"

Change para which reads "Significant landscaping requirements including a woodland strip will reduce its developable area to 4Ha or approximately 60 units" to read "Appropriate landscaping requirements including a woodland strip will reduce its developable area to 6.4Ha or approximately 100-120 units"

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

The reason for these changes is to make the Proposal H57 more accurately reflect the matters reported in the accompanying supporting Development Framework Document.

The PKC proposal currently shows H47 allocated over an area of 5.6Ha and with a proposed net developable area of 4Ha, allowing for extensive landscaping.

The TW proposal as submitted, relates to a total area of 10.2Ha of land in control of TW and the neighbouring land in 3rd party ownership, and within the Proposed Plan H57 allocation.

The Development Framework Document submitted with this representation, reflects a detailed site assessment of the entire 10.2Ha site, relating to landscape capacity and visual assessment; application of best practice principles in terms of layout and form; and application of best practice (Designing Streets and Designing Places) where it has been demonstrated the site is highly accessible and can accommodate higher density development within a larger development area.

In relation to the landscaping requirements to include a woodland strip, this will reduce its developable area, to 6.4Ha and is not disputed by TW, however the site area for landscaping itself can still be increased based on the land in its control which it has been demonstrated has the landscape capacity to accommodate a larger developable area. Applying PKC's greenfield land density policy indicating a medium density development of circa 20 units per hectare, over 6.4Ha, the TW proposal demonstrates that this would comfortably provide for the proposed 100-120 units and still provide the extensive landscaping and additional open space required by PKC.

The Development Framework Document shows how the Council's requirements listed in Proposal H57 can be met, along with the Plan's placemaking policies PM1 (Place-making), PM2 (Design Statements), RD1 (Residential Areas), RD4 (Affordable Housing), TA 1 (transport accessibility), CF 1 and CF2 (open space and public access).

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Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="8"/>	Page no.	<input type="text" value="239"/>	Paragraph no.	<input type="text" value="8.1.9"/>

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.

Change at "Strathearn Area - Housing":

Change to the wording of the first sentence of paragraph 8.1.9, which states "TAYplan has identified that in order to provide housing to accommodate projected population increases approximately 130 houses will be required per year". Change the figure quoted from 130, to "140 houses will be required per year".

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

The reason for requesting the change is because the Reporter currently conducting the TAYplan SDP examination, has identified an issue relating to the scale and distribution of housing in relation to SDP Policy 5: Housing.

In his letter to TAYplan dated 7th February 2012, under Issue 15 (attached for reference), he requests TAYplan authority's view about the impact on the plan's strategy, Environmental Report and other studies, in the event that build rates are projected to be higher than the levels used by TAYplan in preparing the SDP.

In their response, by letter dated 27th February 2012, (attached for reference), TAYplan discuss the distribution of average annual housing market build rates. TAYplan confirm the figures were projected on the basis of General Register of Scotland (GROS) 2006 population and household projections. The Reporter has queried what impact, if any, would be the result of projecting GROS 2008 population and household figures. In his view, the Reporter had asked TAYplan to comment on an upward increase in build rates. In the case of Strathearn Housing Market Area, this was requested for a level of 130 increased to a level of 140 (i.e. 10 units per year increase in build rate).

The requested change to para 8.1.9 reflects the effect of the proposed TAYplan changes mooted by the Reporter. When applying the increased build rate for Strathearn, the net effect is an increase in the housing land requirement from 1,820 to 1,960; and the overall net result being an increase in additional allocations required from 265 to 389 units.

Therefore the LDP Housing Land Strategy should reflect the Reporter's suggested changes, subject to final report of Examination and the approval of Scottish Ministers of the findings of the SDP itself.

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Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="4"/>	Page no.	<input type="text" value="64"/>	Paragraph no.	<input type="text" value="4.3.12"/>

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.

At "Greenfield land and housing density" suggest change:
 Change to the wording of the last sentence of paragraph 4.3.12 which states "This can be achieved through higher density development but this must not be at the expense of good design".

Change sentence to read "This can be achieved through higher density development where it can be demonstrated this is compatible with the form and layout of the settlement and has high accessibility to local services".

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

Taylor Wimpey UK supports the Plan's section covering "Greenfield Land and Housing Density" in general terms. It supports the realisation of the Council that to deliver the future housing land requirement, will require significant amount of development from greenfield land.

The Council also recognise the finite resource quality of most greenfield land and therefore it is welcomed that there is an emphasis in the plan based on achievement of higher density development, which must not be at the expense of good design.

However, the Council has stated the lack of available brownfield sites in PKC and that it must release sufficient greenfield land to meet the TAYplan requirement.

In line with Scottish Planning Policy, paragraph 80 begins with "Planning authorities should promote the efficient use of land and buildings". In the case of many sites allocated in the Proposed Plan, within the principal settlements, such as Crieff, it is argued it would be efficient use of greenfield land to encourage increased densities particularly where this may be compatible with the form and layout of the settlement and be of high accessibility.

SPP paragraph 83 advises "The density of new development should be determined in relation to the character of the place and its relative accessibility, with higher densities appropriate at central and accessible locations. Through good design it is possible to achieve higher density living environments without overcrowding or loss of amenity." Taylor Wimpey has submitted a development framework document to demonstrate the high accessibility and strong landscape capacity to accommodate higher density.

Rather than adhere to the flexible density ranges as outlined in the Proposed Plan at page 68, where flexibility within the range would be assessed on a 'case by case' basis, Taylor Wimpey UK Ltd wish that the plan encourages future development, via planning applications and/or development briefs for sites, where it will be up to the developer to demonstrate and justify any reasoning for the application of higher densities, guided by national policies such as Designing Streets (2010) or Designing Places (2009). These reasons should be made in relation to the character of the place and its relative accessibility.

In relation to a settlement such as Crieff, and the proposed allocations of housing land in the plan at this settlement (Proposals H55, H56 and H57), all the allocations are located on the edge of the town, adjacent to relatively new (medium density) suburban housing (if compared against the table on page 65 of the proposed plan). However the sites are highly accessible to the services and facilities of the town centre, and also in the case of Housing Proposals H56 and H57 in particular, these are located closer to new centres of community facilities at Broich Road, such as supermarket, leisure centre, high school comprising essential services close to these future developments. It would therefore be likely these sites (Proposal H56 and H57) by virtue of their proximity to services and high accessibility need to demonstrate that application of higher density would not result in overcrowding or loss of amenity. The development framework document submitted with these representations demonstrate the opportunity provided by the site Proposal H57 to offer this flexibility and retain the residential amenity and design without compromise.

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Site ref.	<input type="text"/>	or	
Chapter	<input type="text" value="Chapter 4 Spatial Strategy"/>	Page no. <input type="text" value="64"/>	Paragraph no. <input type="text" value="4.3.10 'windfall'"/>

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.

Change the wording of paragraph 4.3.10 describing the Council's approach to windfall as a contributor to the overall supply. The change sought is to the last sentence to reflect a more flexible approach to windfall allowance, reworded to state:

"It is expected that in Perth and Highland HMAs, more than 10% of the land supply will be met by windfall sites. In all other HMA areas, windfall will be examined in terms of the contribution to flexible land supply in circumstances where allocated development plan sites in these HMAs can demonstrate an ability to provide increased supply from identified sites themselves".

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

The reason for requesting the change is because if the LDP allocates sufficient sites in the right places, there is less likelihood of developers seeking out windfall opportunities. We accept that there will always be an element of windfall and would recommend that either ZERO or 5% be allowed for in the calculations.

This will also ensure that a 'generous' supply of sites are allocated, and plan-led. We would also direct PKC to PAN 2/2010 para 62. Windfall sites 'are not counted towards meeting the housing land requirement' They should be seen as a bonus, over and above the allocated sites, and will contribute to the 'generous' supply required by Scottish Government.

The Proposed Plan states on page 64 under 'Greenfield land and housing density', "Scottish Government guidance and good planning practice encourage new development to utilise brownfield land where possible. However, the availability of brownfield sites in PKC is extremely limited. As a result, much of the pressure for new development will be accommodated on greenfield land around the towns and villages of the area"

The Housing Needs and Demand Assessment (HNDA) and the Main Issues Report of the plan state that Perth and Highland have the largest contribution towards supply from windfall sites. Therefore, the assumption for 10% of the overall land supply across PKC is not appropriate and should be varied across the different HMA's with higher allowances in Perth and Highland HMAs and lower OR ZERO allowances across Strathearn, Kinross and Strathmore and the Glens HMAs.

By reducing the windfall proportion downward of 10% in HMAs with all their allocations on greenfield sites (all HMAs except Perth and Highland) this would prevent developers from seeking out future sites not allocated in the plan, which could result in creating undue uncertainty for communities. A plan-led approach is essential.

Taylor Wimpey makes further comment about the effect of this proposed change, in relation to how allocated sites can help meet the housing land requirement, without the need for windfall, and without compromising the development site's residential amenity or landscape impact.

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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.	<input type="text"/>	or			
Chapter	<input type="text" value="4 Spatial Strategy"/>	Page no.	<input type="text" value="64"/>	Paragraph no.	<input type="text" value="4.3.8"/>

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.

Change the table showing “TAYplan 2010-24 requirement Effective Housing Land supply shortfall” to better reflect the Reporter’s identified update to TAYplan Policy 5/Proposal 2 in the Proposed Plan.

TW has provided its own indicative review of the figures in the accompanying document setting out proposals for housing Proposal H57. Within that, a case is advanced and appropriate numbers suggested.

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

The Housing requirement 2010-2024 column and the Additional houses required column should be updated to reflect the position of TAYplan’s housing scale and distribution Policy 5/Proposal 2 in the Proposed Plan which is being examined by the appointed Reporter.; who has sought clarification of TAYplan about the application of GROS 2008 population and household projections, as opposed to the 2006 figures applied by the TAYplan authority.

For Perth and Kinross, the Reporter is suggesting an increase of 130 units per annum should the GROS 2008 figures be used. This relates to a +10 housing unit annual increase in the Strathearn Housing Market Area.

The relevant period for the housing requirement should also be updated to coincide with the relevant TAYplan period of 2012-2032.

These changes assume the same figures of the Effective Supply at March 2011 audit are unchanged, however we would anticipate the Effective Supply at March 2012 or at the time of adoption of the LDP, these figures will change to reflect the most up to date position.

The change is because the Reporter currently conducting the TAYplan SDP examination, has identified an issue relating to the scale and distribution of housing in relation to SDP Policy 5: Housing.

In his letter to TAYplan dated 7th February 2012, under Issue 15 (attached for reference), he requests TAYplan authority’s view about the impact on the plan’s strategy, Environmental Report and other studies, in the event that build rates are projected to be higher than the levels used by TAYplan in preparing the SDP.

In their response, by letter dated 27th February 2012, (attached for reference), TAYplan discuss the distribution of average annual housing market build rates. TAYplan confirm the figures were projected on the basis of General Register of Scotland (GROS) 2006 population and household projections. The Reporter has queried what impact, if any, would be the result of projecting GROS 2008 population and household figures. In his view, he had asked TAYplan to comment on an upward increase in build rates. In the case of Strathearn Housing Market Area, this was requested for a level of 130 increased to a level of 140 (i.e. 10 units per year increase in build rate).

Therefore the LDP Housing Land Strategy should reflect the Reporter’s suggested changes, subject to final report of Examination and the approval of Scottish Ministers of the findings of the SDP itself.

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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	Taylor Wimpey UK Ltd
Address and Postcode	c/o Colliers International, 39 George Street, Edinburgh, EH2 2HN
Telephone no.	[REDACTED]
Email address	[REDACTED]

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Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="4 Spatial Strategy"/>	Page no.	<input type="text" value="63"/>	Paragraph no.	<input type="text" value="4.3.7"/>

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.

In the "Housing land strategy" section seek change to the TAYplan annual build rates identified on the diagram titled "TAYplan average annual LDP build rates".

The rates should mirror the annual build rates suggested by the Reporter conducting the examination of the TAYplan SDP. The Reporter has indicated for Strathearn, the change should be from "130" to "140".

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

The reason for requesting the change is because the Reporter currently conducting the TAYplan SDP examination, has identified an issue relating to the scale and distribution of housing in relation to TAYplan Policy 5: Housing.

In his letter to TAYplan dated 7th February 2012, under Issue 15 (attached for reference), the Reporter requests TAYplan authority's view about the impact on the plan's strategy, Environmental Report and other studies, in the event that build rates are projected to be higher than the levels used by TAYplan in preparing the SDP.

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In the Reporter's view, he had asked TAYplan to comment on an upward increase in build rates. In the case of Strathearn Housing Market Area, this was requested for a level of 130, increased to a level of 140 (i.e. 10 units per year increase in build rate).

Therefore the LDP Housing Land Strategy should reflect the Reporter's suggested changes, subject to final report of Examination, and the approval of Scottish Ministers of the findings of the SDP itself.

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Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="2"/>	Page no.	<input type="text" value="20"/>	Paragraph no.	<input type="text" value="2.4.4"/>

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.

At the section, on page 20 beginning “Demographic Change” - TWUK wish to see:
Change the second paragraph of the “Demographic Change” section.

That paragraph refers to how TAYplan has adopted the Scottish Government’s 2006 based population and household projection. Taylor Wimpey UK suggests the Proposed Plan adopts, at least, the Scottish Government’s 2008 based population and household projection (GROS 2008).

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

The reason for requesting the change is because the 2006 based figures are now out-of-date, a weakness of the strategic requirement proposed in TAYplan, which has been flagged-up by the Scottish Minister’s appointed Reporter examining TAYplan (the Strategic Development Plan).
(See attached correspondence between TAYplan, DPEA and Taylor Wimpey UK Ltd).

Planning for growth does not automatically mean that it will happen. However, a clear message can be sent to the industry that PKC is ‘open for business’.

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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.	PM3 Infrastructure Contributions	or			
Site ref.		or			
Chapter	3	Page no.	24	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.

Make the Policy clearer in terms of how it links to Planning Circular 1/2012: Planning Agreements

Change reference to the need for a planning agreement, in favour of explaining how planning conditions must firstly be examined for their appropriateness

Add references to the appropriate Supplementary Planning Guidance, either published or in preparation, to allow the Policy linkage to be made clear.

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

The policy tests set out in Circular 1/2012: Planning Agreements are more detailed in their expectations of under what circumstances infrastructure contributions are required, compared with criteria a) and b) in Policy PM3.

Circular 1/2012 states how contributions should fairly and reasonably relate in scale and kind. This is not explained in Policy PM3.

The contributions must only be asked for when they are required to mitigate a detriment created by the development.

Policy PM 3 states that 'requirements of this policy may be secured through legal agreements'. Rather Circular 1/2010 paragraph 13 emphasises a need to exhaust the use of planning conditions first by stating 'Planning authorities should firstly consider whether the restriction or regulation can be achieved by the use of a planning condition. Planning conditions are preferable to a planning or other legal agreement, as they are simpler and can potentially save time and money.'

References or links to the appropriate topic-specific Supplementary Planning Guidance (SPG) to be read in conjunction with this policy should be listed.

TW is disappointed that key SPG relating to the house-building industry and which is most relevant to Policy PM3 has not been published for consultation. e.g Transport, Infrastructure and Community Facilities.

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

Developer Contributions Supplementary Guidance (Dec 2011)

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"/> 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.

Ensure there is a clear link established between LDP Policy PM3 Infrastructure Contributions and the Supplementary Planning Guidance (SPG).

Delete paragraph 3.14

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

In principle TW supports the broad assumption that developers should be required to remediate the impacts of their developments in order to make them acceptable in planning terms.

However TW considers the use of Planning Agreements under Section 75 of the Town and Country Planning (Scotland) Act 1997 has been extended beyond the scope of the tests of planning purpose, relationship to the development, scale and kind and reasonableness set out in Circular 1/2010.

TW considers the methodology to calculate the impact of new development on infrastructure and services should have regard to the net new impact, not simply total impact.

Paragraph 3.14 is not acceptable to TW and should be deleted: 'There are times where it may be appropriate to require additional revenue costs from developers.' The SPG provides some guidance about the type of additional revenue costs e.g. paying for a subsidised bus service or part funding of a community development worker.

It is not appropriate for housing developments, or other land uses, to subsidise private enterprise.

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