

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

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

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

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

Name	Shand Partnership c/o Emac Planning LLP
Address and Postcode	Ballinard House, 3 Davidson Street, Broughty Ferry, Dundee, DD5 3AS
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or
Site ref.	Land to North West of Crook of Devon (Ref: 02-9047)	or
Chapter	4 & 7	Page no. <input type="text"/> Paragraph no. <input type="text"/>

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

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

Please see attached statement

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

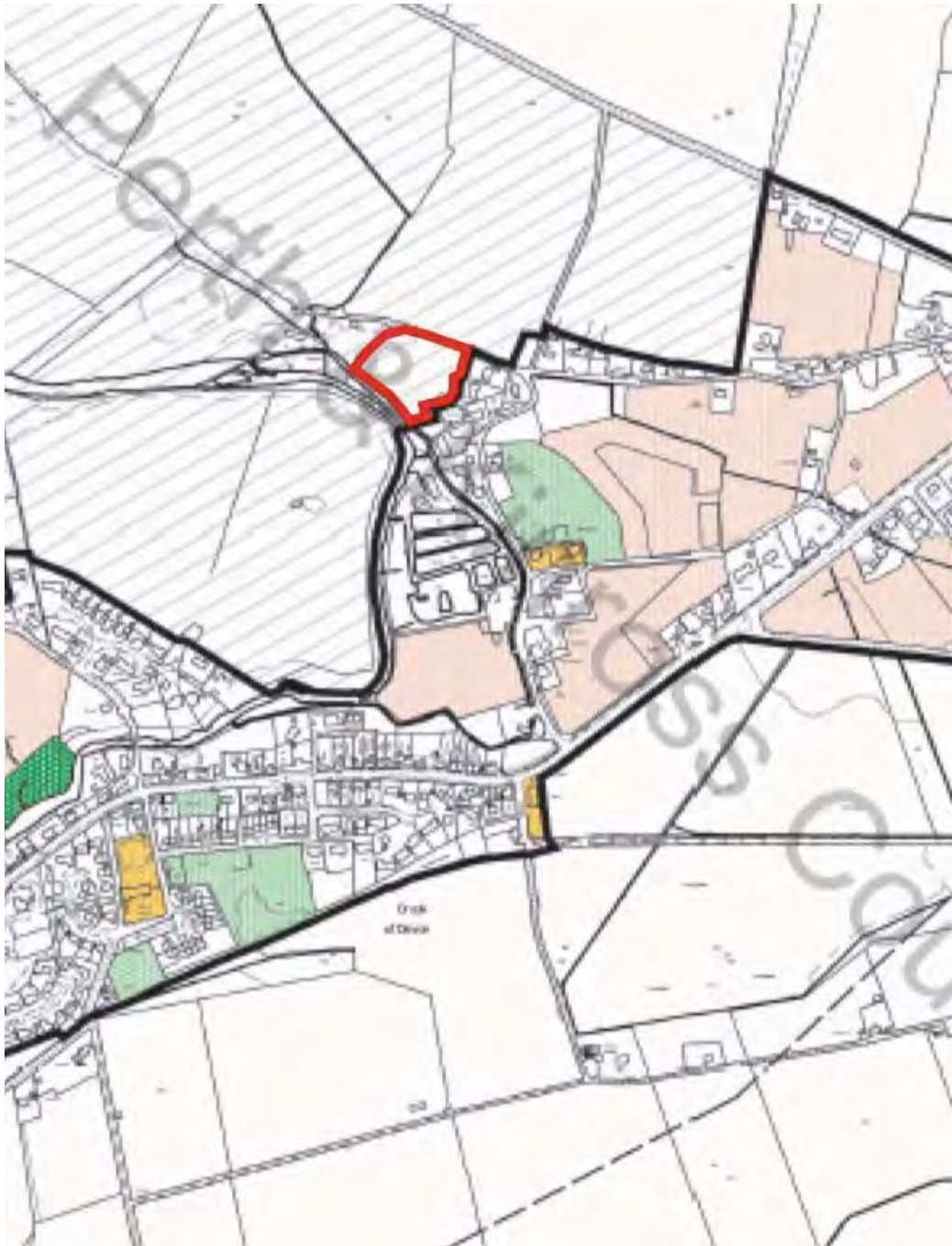
Please see attached statement

Save a copy

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Submit

APPENDIX 1: PROPOSED EXTENSION TO SETTLEMENT (PLAN)



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

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Name	Shand Partnership/E. Nelson c/o Emac Planning LLP
Address and Postcode	Ballinard House, 3 Davidson Street, Broughty Ferry, Dundee, DD5 3AS
Telephone no.	[REDACTED]
Email address	[REDACTED]

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Policy ref.	<input type="text"/>	or
Site ref.	Land to West of Blairforge (Ref: 01-9047)	or
Chapter	4 & 7	Page no. <input type="text"/> Paragraph no. <input type="text"/>

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Please see attached statement

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

APPENDIX 1: LAND TO WEST OF BLAIRFORGE: PROPOSED EXTENSION TO SETTLEMENT



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

Name	Alistair Smith
Address and Postcode	Ashtrees Wester Balgedie KINROSS, KY13 9HE
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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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.	Glenlomond	or			
Chapter	<input type="text"/>	Page no.	220	Paragraph no.	7.9

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

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7.9.3 Refers to the Public Waste Treatment Works. This is incorrect as the treatment works are private. As far as I am aware they have very little spare capacity if any. It is very unlikely that any new houses can be accommodated.

When Glenlomond was developed, the residents of Wester Balgedie objected due to the vastly increased traffic that would flow through Wester Balgedie. The original development at Glenlomond was for 45 houses and a nursing home of 48 beds. The number of beds has now increased to over 100 with the consequent increase of traffic due to increased staff, increased visitors and increased deliveries.

In addition traffic has increased substantially due to changed patterns such as courier deliveries with internet ordering and home deliveries of groceries.

In addition the Dryside Road has been hard surfaced right through to Fife, with additional traffic due to rat-running, tourists etc..

All this has generated substantially more traffic through Wester Balgedie all of which has made life in WB considerably more uncomfortable. Inevitably you can drivers who just ignore the village and race through the village making it very hazardous.

Consideration must be given to the residents of Wester Balgedie of the possibility of any further development in Glenlomond

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

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

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

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

Name	Alistair Smith
Address and Postcode	Ashtrees, Wester Balgedie KINROSS KY13 9HE
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

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Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	Wester Balgedie	or			
Chapter	<input type="text"/>	Page no.	236	Paragraph no.	7.18

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.

I would like to see an amendment to Policy CF1A by adding the following sub-clause:

(e) Development proposals resulting in the loss of these areas will also not be permitted where the open space land preserves and protects village settings for historic and conservation areas. This will include any proposal to use the land for gardens for adjacent housing

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

Policy CF1A refers to recreation land only. In the current Kinross Area Local Plan 2004, there is a Policy 88 which preserves land against use to protect the village setting and this is not covered by the new Policy.

While welcoming the designation of Open Space land within the Conservation Area of Wester Balgedie, it is important that this land is retained for the village setting as it is an important of the Conservation.

Apart from that I support the proposals for Wester Balgedie as they are imperative for the conservation of the last 'ferm toun' in Kinross-shire

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.

grant and geoghegan

chartered planning · development and architectural consultants

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

2nd April 2012

Our Ref – Bertha Park/JG/LL

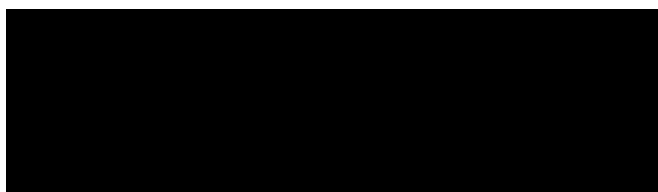
Dear Sir

**Perth & Kinross Council – Local Development Plan – Proposed Plan – January 2012
Representation by Springfield Properties Ltd**

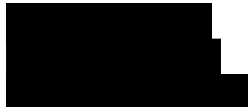
We have attached a representation from Springfield Properties Ltd on the Perth and Kinross Local Development Plan – Proposed Plan, related Supplementary Guidance and Draft Action Programme.

Whilst the representation is from Springfield Properties Ltd we are acting as agents and first point of contact. Could you please ensure that all correspondence is with ourselves in the first instance, using my personal direct contact details below.

Yours Faithfully,



Joe Geoghegan BA (Hons) MRTPI





Please reply to the Larbert office

30th March 2012

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

Dear Sir

**Perth & Kinross Council – Local Development Plan – Proposed Plan – January 2012
Representation by Springfield Properties Ltd**

This letter sets out Springfield Properties representations on the Perth & Kinross Local Development Plan – Proposed Plan, related Supplementary Guidance and Draft Action Programme.

Springfield commented on the Main Issues Report regarding the promotion of Bertha Park as a strategic expansion site for Perth. The comments were supported by;

- Bertha Park – supporting information document
- Landscape and Visual Impact Assessment
- Site Landscape Analysis
- Transport Statement

These documents are referred to again as they demonstrated the planning and landscape fit of the site and provided analysis for short and longer term transport strategies with a first phase of up to 300 homes via the existing access to the site from Ruthvenfield Road.

Springfield is very pleased to see Bertha Park identified in the Proposed Plan as a strategic site for the expansion of Perth and looks forward to working with the Council and all stakeholders to bring the site forward effectively and expeditiously. This representation is made to assist that happening.

Springfield

Springfield Properties is promoting the development of Bertha Park with the full support of the landowners – A Ritchie & Sons. This provides the Council with a very significant opportunity and level of certainty regarding the delivery of Bertha Park. Springfield will act as lead developer and there is only a single ownership involved. This can ensure the long term delivery of development at Bertha Park without the added complexities of multiple land ownerships and multiple developers.

Springfield has the capacity and capability to deliver Bertha Park.

The construction and housebuilding arm of a successful property group based in Elgin, the company has experienced steady growth through the last two decades and reported a profit every year. Planned expansion into Central Scotland included the take over the Scottish operations of Redrow in 2011. Springfield is active on 20 sites and is promoting another 15 sites throughout Scotland spanning an area bounded by Kilwinning/Dalkeith in the South and Macduff/Alness in the North.

In 2011/12 turnover is projected to be £53m with 189 private homes sold and 174 affordable homes built on contract. The workforce numbers 214. In total about 400 people work on Springfield projects at any one time.

Springfield is customer focused across all its markets delivering quality and value. It has a proven record of consistently delivering on time and within budget. Control of projects is maintained by employing a wide range of skills in house including: architectural design/drawing; planning/land buying; quantity surveying; civil engineering; and kit manufacture. Where commercially possible the company works with a directly employed workforce of which 10% are apprenticed. Where external expertise is required the company maintains long term relationships with respected consultants.

Since 2002 the company has built over 750 affordable homes in the North East of Scotland for RSLs and local Councils and is promoting a further 750 throughout Scotland. The company promotes opportunities for RSLs and is skilled in bringing together the long term partnerships which deliver these projects

Springfield's biggest development to date is Elgin South, now almost complete, it was developed from land in multiple ownership in 1995 to a prime development today of over 1100 homes with a wide range of community facilities and employment opportunities. Through its property investment companies the Springfield Group has invested in the planned infrastructure to deliver affordable and mainstream housing, road network improvements, offices, retail, day care, sports facilities and the largest health care centre in the north of Scotland.

The company has been chosen to be the development partner at An Camas Mor, Aviemore, the first major housing development to take place in a national park in the UK. Led by Springfield a team including the landowner and a variety of external consultants is currently working on a planning submission for the first 200 homes. The final masterplan could see up to 1500 homes built.

The company has a record of remaining ahead of building regulations and 2012 will see Springfield handover the first 2016 compliant home in Scotland at the Fife Housing Fair in Dunfermline. The company has worked in partnership with architects, academics and the timber industry to develop a compliant build system which is commercially viable.

Proposed Plan – Vision and Strategy

Springfield supports the vision statement in the Plan and welcomes the recognition that it wishes to be able to respond to any economic upturn by ensuring that a lack of effective housing land does not become a constraint. Given the challenges of delivering Bertha Park it is also pleasing to see the Council recognise that overcoming infrastructure constraints will require co-operation between the public and the private sector to share the costs of providing the necessary infrastructure.

Springfield also supports the hierarchical spatial strategy which is required to comply with the Tay Plan. The Proposed Plan recognises that the spatial strategy requires strategic sites to enable it to be successful. Springfield is pleased that Bertha Park has been accepted as such a site.

Springfield supports and can deliver the strategic aspirations for the site in terms of it being a sustainable mixed use community providing housing, social, community and employment uses.

Bertha Park – Site Designation

Springfield has no fundamental concerns about the requirements set in Policy H7 for Bertha Park, however there are points that need clarification and adjustment.

It will be very important for a degree of development to be possible in the early stages to release investment for the ongoing development of the site and for meaningful Developer Contributions to be possible for the delivery of infrastructure. The designation states that the Cross Tay Link Road and the new crossing of the River Almond would be required at the commencement of the development with phasing details require to be agreed.

Work already carried out by Arup and submitted as part of Springfield's representations on the Main Issues Report showed there is potential for up to 300 homes to be accessed direct via the existing access from Ruthvenfield Road and this was agreed at the time with the Councils Roads officers. Springfield wish to see this reflected in the designation. It is requested that up to 300 houses be allowed as the commencement of development on the site prior to the CTRL junction on the A9 being completely in place along with a new crossing of the River Almond.

The designation also requires the investigation of a district heating system and combined heat and power infrastructure using renewable resources. Springfield is happy to investigate the feasibility of this but would appreciate seeing this balanced against other ways of achieving a sustainable reduction in environmental impacts which could for instance be achieved through a more sustainable approach to sewerage systems. If the ultimate aim is to enhance sustainability and if it emerges there are difficulties with the provision of a district heating system/combined heat and power plant then the designation should make it clear that this is not a mandatory requirement but an option to be looked at as part of a balanced approach to sustainable development.

There is an area of land (approximately 8 hectares) under the control of the landowners of Bertha Park which has been omitted from the proposed designation (see attached Plan). This area of land, although small in relation to the overall designation, is significant in that its location could be of value when looking at options for a park and ride scheme and the CTRL/A9 junction. Additionally it could be of benefit to have this land identified as a possible option for a district heating/combined heat and power plant or as an acceptable location for housing if it is not required for other purposes. It is as well defined and contained by structural landscaping as the remainder of the land within the proposed designation. It is requested that it be added to the H7 designation.

Bertha Park - Master Plan

Springfield supports the requirement for a Master Plan for the site. However the text preceding the designation (paragraph 5.2.6) states that the Master Plan for Bertha Park would require to be integrated with the Master Plans for Perth West and the E38 Ruthvenfield Road employment designation. There is no indication in the plan as to how this integration would be achieved. It is suggested that the Council should indicate in the Plan that it will provide a framework for the integration of the Master Plans to avoid potentially competing commercial interests holding up the process.

Springfield wishes to commence work on the Master Plan for Bertha Park straight away and wishes to engage actively with the Council, consultees/stakeholders to allow a planning application to be submitted as soon as is possible around the examination in public and adoption of the Plan. Springfield wish to agree the framework for the Master Plan with the Council and also agree proposals for community engagement reflecting current National Planning Policy, Advice and Guidance.

As some of the infrastructure required to release these major designations will involve land outside of the control of the parties it would be helpful for the Council to indicate in the plan that it will be prepared to promote compulsory purchase of land if required to ensure the delivery of joint infrastructure.

Developer Contributions

The promotion of mechanisms for Developer Contributions is fundamental to the development of Bertha Park and other strategic sites to allow equitable and fair contributions for the infrastructure required but at the same time allow development to take place, particularly initially, to release the necessary capital to fund development and Developer Contributions. Springfield's preferred approach is for some form of "roof tax" with public bodies funding major elements of infrastructure with the costs being recouped through the roof tax based on predefined triggers e.g. no more than a specified number of houses to be completed prior to contributions being delivered through the roof tax in relation to defined and specified elements of infrastructure.

In order for this critical issue to be resolved it is very important for the Council to bring forward the Supplementary Guidance which the Plan states will be prepared during 2012. Springfield would wish to see this brought forward and consulted on as soon as possible so that it can be taken forward in tandem with a production of a Master Plan for the site.

Draft Action Programme 2012 – 2024

The Council has issued a Draft Action Programme for the period 2012 – 2024 for comment. Whilst supporting the principle of the Action Programme there are actions in it which Springfield wish to comment upon and/or see brought forward.

The timescale for the Master Plan and other important site actions for Bertha Park are identified for 2015. Springfield intends to start work on the Master Plan straight away and the timescale should be altered to 2012. This would also help tie in with the proposals for the major employment site E38 which is identified for site actions, including a Master Plan, in 2012. The Proposed Plan promotes integration between the Master Plans and this could be hampered if the Master Plan for Bertha Park is held back up to 2015 whilst the Council is proposing to push forward a Master Plan for E38 during 2012. The same can be said for the Master Plan for Perth West which is identified for 2015 and needs to be brought forward to tie in with the Master Plans for Bertha Park and the E38 designation.

There are other actions which Springfield would like to see brought forward to Spring/Summer 2012 as they are critical to the delivery of Bertha Park and other strategic sites;

- PM3 - preparation of supplementary guidance for contributions to transport infrastructure, community facilities and green infrastructure.
- ED1A - preparation of supplementary guidance on employment uses most suited to mixed use allocations.

- ER1 - preparation of supplementary guidance on renewable energy and low carbon energy generation.
- EP3 - investigation of the sewerage system and water supply networks.

TA1 – The CTRLR needs to be brought forward substantially from 2020 to assist the release of the strategic development sites including Bertha Park. The same can be said of the timescale of 2014 for the Western Edge Link Road under TA1 which is identified for 2014.


Conclusions

Springfield supports the vision and spatial strategy in the Proposed Plan and in particular the proposed designation for Bertha Park. We wish to work with the Council and all stakeholders to deliver the designation as soon as possible and with this in mind we would like to see the following incorporated in the Proposed Plan;

- The designation for Bertha Park should allow for up to 300 homes to be released via Inveralmond prior to the CTRLR/A9 and Almond crossings being in place.
- The requirement for a district heating system/CHP plant for Bertha Park should be identified as an option as part of a mix of infrastructure requirements aimed at promoting sustainable development.
- An additional area of approximately 8ha should be added in to the designation.
- The Council should promote a framework for the integration of the Masterplans for Bertha Park, Perth West and site E38.
- The Proposed Plan should make it clear that the Council will promote compulsory purchase if required to release land for infrastructure critical to the delivery of strategic sites.
- Various actions in the Draft Action Plan should be brought forward as listed above.

We look forward to an ongoing dialogue with the Council and all stakeholders to deliver the plan and in particular Bertha Park.

Yours faithfully



Annie Russell
Land Manager
Springfield Properties PLC

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

keppie

19 March 2012

Our Ref: GMAC / AMN / 208493

Perth & Kinross Council
Planning & Regeneration
Pillar House
35 Kinnoull Street
Perth
PH1 5GD

Dear Sirs,

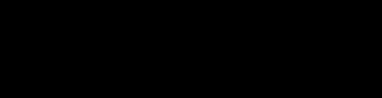

**Perth & Kinross Local Development Plan 2012
Objections and Support from Mr & Mrs Thomson**

We enclose in this PDF submission, the objections and support on behalf of the above client.

The submission includes the relevant representation forms, a Planning Statement on behalf of the client and, a number of documents in support of our position.

We trust this is in order, and we look forward to hearing from you further in due course, however should you require any clarification, please do not hesitate to contact Gordon MacCallum at Keppie Planning on the number below.

Yours faithfully


Gordon MacCallum
Director


cc: Mr & Mrs G Thomson

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

Name	Keppie Planning & Development (for Mr & Mrs G Thomson)
Address and Postcode	160 West Regent Street Glasgow G2 4RL
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.	Alyth and New Alyth Proposed Plan	or			
Site ref.	Airlie View (Site 1 on attached statement)	or			
Chapter	9.2	Page no.	279 & 280	Paragraph no.	9.2.1

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.

Settlement boundary re-drawn at Meethill Road, Alyth to allow for settlement expansion, and the re-drawing of boundary to exclude land at Isla Road / Annfield Place (Site C in the Main Issues Report) 100 units and Alyth Glebe, Site B for the same reasons.

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

The Council has required to delete 2 of their sites proposed in the Main Issues Report, known as Site B Alyth Glebe and Site C Isla Road / Annfield Place.

Both sites have been deleted due to SEPA objections and significant flood risk concerns, as outlined in Appendix C, Table C7, page 74 attached as document K(2) to our client's submission.

Simply put, these 2 areas as shown on document K(3) are non-effective for a number of reasons, firstly they are not developable due to flood risk, secondly, not in the confirmed or option of a volume housebuilder and, thirdly, marketability terms, unsuitable.

Whilst we agree in having the Town Boundary re-drawn to accommodate future growth, the areas identified should be effective and appropriate. We therefore seek to have land at Meethill Road, Alyth (Site 2) per the attached plan, document K(4) replace the 2 areas preferred by the Council for all the reasons set out in our attached statement.

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

Name	Keppie Planning & Development (for Mr & Mrs G Thomson)
Address and Postcode	160 West Regent Street Glasgow G2 4RL
Telephone no.	
Email address	

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text" value="Alyth and New Alyth Proposed Plan"/>	or			
Site ref.	<input type="text" value="Proposed Plan Site 2 Meethill Road (on attached statement)"/>	or			
Chapter	<input type="text" value="Chapter 9.2"/>	Page no.	<input type="text" value="280 & 281"/>	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.

None - see below

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

We support the statement in para. 9.2.1 on page 279 that land identified at Airlie View as shown on the Proposals Map, within the Town Boundary, could come forward as appropriate for development. This area is effective from a housebuilding perspective and we fully support its inclusion within the Town Boundary, as of course, has been the case within the Adopted Local Plan. However, the status of such sites have been clarified through this LDP.

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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keppie

20 March 2012

Our Ref: GMAC / AMN / 212414

Perth & Kinross Council
Planning & Regeneration
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

Dear Sirs,

**Perth & Kinross Local Development Plan 2012
Objections and Support from Branston Ltd, Abernethy**

We enclose in this PDF submission, the objections and support on behalf of the above client.

The submission includes the relevant representation forms, a Planning Statement on behalf of the client and, a number of documents in support of our position.

We trust this is in order, and we look forward to hearing from you further in due course, however should you require any clarification, please do not hesitate to contact Gordon MacCallum at Keppie Planning on the number below.

Yours faithfully

Gordon MacCallum
Director

cc: Mr E Ritchie, Branston Ltd, Abernethy

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	Keppie Planning & Development per Branston Ltd
Address and Postcode	160 West Regent Street Glasgow G2 4RL
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.	H 11	or
Site ref.	H 11 Newburgh Road (North)	or
Chapter	5.4 Abernethy	Page no. 85 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.

Reduction of housing site H 11 to reflect the ownership of Branston Ltd who have intentions to expand their operations into site H 11 on the land which they bought from Wilburn Homes in 2010.

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

Site H 11 should be altered to reflect the ownership and intention of Branston Ltd to expand their operations within the site on land purchased for providing additional production/processing facilities.

Branston Ltd have no objections to the remaining ground being zoned for housing and will be happy to work alongside the owner, Mr Ian Bett, or any future housebuilder to ensure that both uses can coexist in harmony, as has been done with the existing operations and surrounding properties.

As far as the effectiveness of housing sites is concerned, this should reflect land ownership and the intentions of Branston Ltd at some point during the lifetime of this Local Plan, to seek to expand their operations. In short, part of H 11 is not available as illustrated in Plan 1, Document K1. The full attached statement will explain matters more comprehensively.

-- SEE ATTACHED STATEMENT --

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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	Keppie Planning & Development per Branston Ltd
Address and Postcode	160 West Regent Street Glasgow G2 4RL
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.	E 4	or
Site ref.	E 4 Newburgh Road	or
Chapter	5.4 Abernethy	Page no. 85 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 the allocation of existing brownfield site at Newburgh Road which adjoins the current operations of Branston Ltd, Abernethy

Branston Ltd will require to expand their operations in the near future and this site in addition to other land nearby is required for industrial use.

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

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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	Keppie Planning & Development per Bellway Homes Ltd
Address and Postcode	160 West Regent Street Glasgow G2 4RL
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.	H 69	or			
Site ref.	H6 Ardler Road 1.2 hectares	or			
Chapter	9.14 Meigle	Page no.	301 - 302	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.

The boundary of the site and its capacity needed to reflect site constraints.

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

This site, H68, appears to have developability issues on at least part of the site. There is no volume builder involved and its ability to achieve a development of houses questionable.

This area could be re-zoned as white land where a suitable extension to the settlement could come forward as a planning application if there was a viable development interest.

The site in the control of Bellway at Ardler Road should substitute/replace both sites identified H68 and H69 for the reasons stated in the attached Statement of Objection on behalf of Bellway Homes Ltd.

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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	Keppie Planning & Development per Bellway Homes Ltd
Address and Postcode	160 West Regent Street Glasgow G2 4RL
Telephone no.	[REDACTED]
Email address	[REDACTED]

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Chapter	9.14 Meigle	Page no.	301 - 302	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.

The boundary of the site and its capacity needed to reflect site constraints.

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

This site, H68, appears to have developability issues on at least part of the site. There is no volume builder involved and its ability to achieve a development of houses questionable.

This area could be re-zoned as white land where a suitable extension to the settlement could come forward as a planning application if there was a viable development interest.

The site in the control of Bellway at Ardler Road should substitute/replace both sites identified H68 and H69 for the reasons stated in the attached Statement of Objection on behalf of Bellway Homes Ltd.

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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keppie

4 April 2012

Our Ref: GMAC / AMN / 212409

Perth & Kinross Council
Planning & Regeneration
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

Dear Sirs,

Perth & Kinross Local Development Plan 2012
Objections of CALA Homes (East) Ltd
Wellbank, Hatton Road, Rattray, Blairgowrie

We enclose in this PDF submission, the objections and support on behalf of the above client.

The submission includes the relevant representation forms, a Planning Statement on behalf of the client and, a number of document in support of our position.

We trust this is in order, and we look forward to hearing from you further in due course, however should you require any clarification, please do not hesitate to contact Gordon MacCallum at Keppie Planning on the number below.

Yours faithfully

Gordon MacCallum
Director

cc: Derek Lawson, CALA Homes East Ltd

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	Keppie Planning & Development per CALA Homes (East) Ltd
Address and Postcode	160 West Regent Street Glasgow G2 4RL
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text" value="H63"/>	or			
Site ref.	<input type="text" value="H63 Glenalmond Road, Rattray"/>	or			
Chapter	<input type="text" value="9.3 Blairgowrie/Rattray"/>	Page no.	<input type="text" value="282-285"/>	Paragraph no.	<input type="text"/>

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

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

Deletion of site H63 and replacement with the CALA site at Hatton Road, Rattray as described in the attached Statement.

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

The CALA site at Hatton Road, Rattray should be included within the Local development Plan as an effective housing site, either as an addition to the supply, or as a replacement for site H63 for the reasons set out in the attached Statement.

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

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Name	Keppie Planning & Development per CALA Homes (East) Ltd
Address and Postcode	160 West Regent Street Glasgow G2 4RL
Telephone no.	[REDACTED]
Email address	[REDACTED]

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2. Which document are you making a representation on?

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

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

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

Policy ref.	Perth & Kinross Spatial Strategy	or			
Site ref.	Land at Hatton Road, Rattray	or			
Chapter	4	Page no.	61-66	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.

Site at Wellbank, Hatton Road, Rattray added to the housing land supply.

There is a shortfall of 285 units of effective supply within the Plan period to 2024.

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

The site at Wellbank, Hatton Road scored exceptionally well in the site evaluation matrix and is fully effective in terms of National Planning Policy. This site will deliver the land supply required within the Plan period. The site will be appropriately screened from the caravan park which adjoins both the CALA site at Rattray, existing housing with the town and site H63 which is in our view, incorrectly preferred for release by Perth & Kinross Council.

(See attached Statement)

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

Name	Sam Mercer Nairne
Address and Postcode	Meikleour House Meikleour Perth PH2 6EA
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="4.3"/>	Page no.	<input type="text" value="64"/>	Paragraph no.	<input type="text" value="4.3.11"/>

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

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

I would like to see a specific provision made for small sites in all areas, not just the Highland area, at a level at least equal to the percent of completions they represented historically.

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

Small developments, particularly in rural areas, are vital in promoting both rural development and architectural diversity and quality. The proposed plan focuses almost entirely on developments of more than 10 houses, let alone 5 houses. I appreciate it is impractical to try to identify all developments of 5 houses or less over the plan period, but by providing no allowance for them there is a danger that there will always be a presumption against them.

If the 'windfall sites' were reserved exclusively for small developments and the plan made it explicit that it has not considered any individual development of less than 5 houses, we could resolve this issue.

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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	Sam Mercer Nairne
Address and Postcode	Meikleour House Meikleour Perth PH2 6EA
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

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Supplementary Guidance	<input type="checkbox"/>	SEA ER Addendum 2 - Appendices	<input type="checkbox"/>

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	<input type="text"/>	or			
Chapter	<input type="text" value="9.15"/>	Page no.	<input type="text" value="303"/>	Paragraph no.	<input type="text" value="9.15.1 to 9.15.2"/>

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.

I would like to see the Meikleour village boundary as detailed in chapter 9.15 drawn more loosely to allow modest in fill development as per the attached plan.

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

Employment opportunities within the village have recently increased considerably with the redevelopment of The Old Dairy, immediately to the south of the village. This has been enabled by grant funding from the Government through the Scottish Rural Development Program and provides 15 offices / industrial units for local businesses. At the time of writing (March 2012), 7 are already completed and occupied. Tenants include mechanics, builders, landscape gardeners and farmers amongst others.

This is helping to rejuvenate the area, but without greater housing availability in the village, employment opportunities are being taken by those further afield. I would therefore like to be able to develop a limited amount of residential housing in the village, in a conservation minded fashion, to allow employment to remain local.

Additionally, the village pub / restaurant / hotel has, like many other businesses in the leisure industry, suffered from poor economic conditions for several years. A greater local market, with more people living in the village, would serve to safeguard this much loved, but too infrequently used, treasure.

In summary, Meikleour village has suffered from decades of decline in employment with the closure of its school, garage and post office and now, finally, is turning the corner. To allow it to flourish over the coming decade a modest amount of residential development will secure its future.

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9.15 Meikleour

9.15.1 Description

Meikleour is a small village of 140 inhabitants located 4 miles south of Blairgowrie and approximately 12 miles north of Perth. This compact conservation village has a number of listed buildings and it has few services except a hotel and part-time post office. The surrounding landscape is in predominantly agricultural use.

9.15.2 Spatial Strategy Considerations

A housing site within the settlement has yet to be completed. No new allocations are proposed and the boundary has been tightly drawn to allow consolidation of the previous development.

The village incorporates a Conservation Area designation which seeks to protect the character and historic integrity of the area.

9.15.3 Infrastructure Considerations

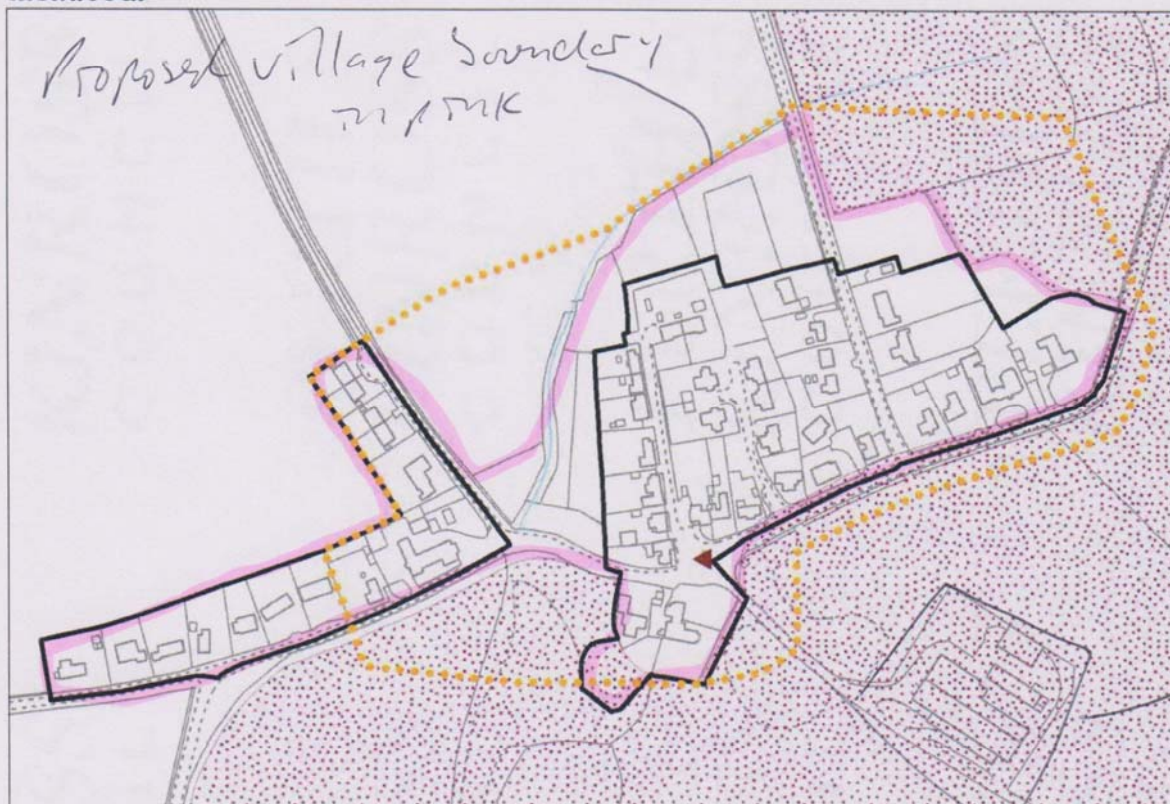
Drainage from all development should connect to Public Drainage System.

All development will be required to incorporate SUDS proposals and may require a Drainage Impact Assessment.

Any development of 5 or more houses will require to contribute towards affordable housing provision in accordance with the Council's Affordable Housing Policy.

All development will contribute towards the provision of on or off-site public space and play facilities where required, in line with Council guidance.

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

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

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	Emac Planning LLP
Address and Postcode	Ballinard House, 3 Davidson Street, Broughty Ferry, Dundee, DD5 3AS
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.	Op13	or			
Site ref.	Scottish Motor Auctions	or			
Chapter		Page no.	207	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 see attached statement.

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

Please see attached statement.

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Perth & Kinross Council
Proposed Local Development Plan

**Representations submitted
on behalf of
Motor Auction (Properties) Limited**

Scottish Motor Auction Site, Kinross

1.0 Executive Summary

- 1.1 This submission is made on behalf of Motor Auction (Properties) Limited in response to the publication of the Proposed Local Development Plan for Perth & Kinross. The submission specifically relates to the uses specified in the Proposed Plan for the site identified as 'Op13'.
- 1.2 Representations were previously submitted to the Main Issues Report in 2009, promoting the identification of the subject land for mixed use residential, employment, food and non-food retail uses.
- 1.3 It is considered that the subject land presents a viable and significant opportunity for the identification of sustainable redevelopment uses; the final mix of which will be determined through further planning engagement regarding the potential relocation of the existing use.
- 1.4 The re-development of the subject land potentially offers numerous benefits to the residents of Kinross including accessibility to local sources of employment, housing and new retail uses. Further benefits may of course be identified through further engagement with the Council and through public consultation exercises as the consideration of the site progresses.
- 1.5 The Proposed Plan has now been published for consultation and identifies the subject land as 'Op13' for 'Employment and high density residential on no more than 50% of the site'. Encouragingly, the Plan recognises that the buildings are no longer fit for purpose and therefore to improve the quality and range of employment land, appropriate residential development will be supported, where high quality employment uses are provided on the majority of the site. The usual developer requirements, i.e. Flood Risk Assessment, Transport Assessment, etc are included.
- 1.6 We also note that the Proposed Plan identifies the former High School (Op 12) for employment/retail/hotel/community/residential. We do however wish to maintain our position that the Scottish Motor Auction site offers a better and more deliverable opportunity for a mixed-use development, including retail.
- 1.7 In this regard, we welcome the Proposed Plans recognition that in the past a significant retail spend has leaked to Perth and Fife towns and although Sainsbury's has improved this situation, there is a need to improve the retail offer in Kinross through the provision of a larger supermarket close to the town centre.
- 1.8 We would contend that the most suitable retail site is the Scottish Motor Auction site and not the former High School. With reference to the usual sequential test for retail proposals, it is our position that the Scottish Motor Auction site can appropriately deliver a large format supermarket with a wide product range close to the town centre.
- 1.9 There is interest in the retail re-use of part of the site from four parties, one retail operator and three retail developers. All four parties are interested in developing part of the site for a medium sized supermarket as part of a larger mixed-use development.

- 1.10 It is therefore respectfully requested that the subject land be identified as an opportunity site capable of addressing a number of needs within the town in terms of potential **food and non-food retail; residential; and employment uses**. Such reappraising of uses will assist in the ongoing desire for the creation of a sustainable mixed community in Kinross. The former High School site should be identified for an appropriate mix of residential and community uses, i.e. excluding retail and employment.

2.0 Site Context

- 2.1 Kinross is located approximately 17 miles to the south of Perth and 27 miles north of Edinburgh on the M90 motorway, the main transport route from Perth to Edinburgh and has the usual range of amenities and services that you would expect in a town of this size, i.e. in terms of local employment, retail, community and education provision.
- 2.3 2007 saw the opening of a new Park and Ride facility on the western outskirts of the town next to Junction 6 of the M90. This facility supports TACTRAN's Regional Transport Strategy objectives of reducing congestion, improving accessibility and promoting use of more sustainable options for commuter and other travel demands.
- 2.4 The subject land extends to approximately 3.82 hectares is located near the south side of Kinross and is characterised as a busy employment site carrying out Motor Vehicle Auctions and until recently hosted Saturday Car Boot Sales and Sunday Markets. The site therefore currently operates as an employment generator and has an established retail use.
- 2.5 On it's northern and, partially, western boundary, the neighbouring use is residential. The remainder of the western boundary, i.e. fronting onto the High Street, is characterised by the 'S Koronka (Manufacturing) Limited' employment site on the Bridgend Industrial Estate.
- 2.6 To the south lies the River South Queich and beyond that the employment site of 'Todd and Duncan' Loch Leven Mill. The eastern boundary abuts an open area of scrubland leading down to the shore of Loch Leven.

3.0 Development Opportunity/ Proposal

- 3.1 Although presently operating as a Motor Auction Mart and, until recently, Car Boot Sales/Sunday Market, the site was previously the subject of a long-standing application for residential redevelopment. Such an approach fits well with the understanding that there are a variety of adjacent/neighbouring uses and as such, undoubtedly a variety of compatible uses, which could be acceptable on the site.
- 3.2 In terms of the planning application history of the site, i.e. application for a mixture of 197 private and affordable houses (Application Ref: 05/02457/FUL), the site is considered capable of accommodating either this residential re-use and or a mix of residential and/or employment and/or retail

- uses and as such, it is considered that the potential redevelopment for such uses should be recognised in the Local Development Plan.
- 3.3 Such an approach would be consistent with the Councils own desire to see an integrated and diverse reappraisal of the uses considered appropriate on a variety of sites within the general environs of south Kinross.
- 3.4 Many Local Plans throughout Scotland have utilised this approach, i.e. the identification of windfall sites as opportunities for redevelopment for mixed uses.
- 3.5 Given uncertainties related to the timing of such sites for development in the current market conditions and the range of potentially suitable uses, they effectively provide an opportunity to facilitate a variety of uses, without the dis-benefits and rigidity of being solely allocated for a single specific use.
- 3.6 Such an approach is considered to be eminently suitable for the subject land as it is clearly appropriate for its existing employment and retail uses but also, through the submitted planning application, it is clearly also suitable for sole or partial residential use.
- 3.7 The site is shown in the Proposed Plan as 'Op13' and the inset plan for 'Kinross/Milnathort', on page 209 of the Plan, accurately identifies the extent of the area proposed for development. A masterplan is purposefully not included at this stage to enable full engagement on the principles to be evolved through the community masterplanning process.
- 3.8 It is considered that a various use opportunity site allocation is wholly consistent with the aims and objectives of national policy, guidance and advice in that:-
- It would facilitate the re-appraisal of uses on this key site in the south Kinross area;
 - Various uses are appropriate on what is in effect a windfall, brownfield site;
 - Such an allocation would have no detrimental environmental impact and would give rise to a positive impact on character and amenity;
 - Redevelopment of the site for the stated uses will generate additional employment. The current use employs 38 full time and 18 part time employees whilst by way of comparison a 3,500 sq m retail use would generate 206 full time equivalent jobs.
 - It would be consistent with sustainable transport policies; and would deliver a high quality use, whatever that use or mix of uses may be.

4.0 Impact on Local Infrastructure

- 4.1 Taking into account infrastructure requirements in the allocation of additional development sites is an important aspect in the consideration of emerging local development plan allocations. This will logically be carried out through the Local Development Plan process and be informed by the SEA. Notwithstanding, it should be noted that there are not considered to be any technical reasons why the Scottish Motor Auction site cannot be delivered for the ongoing current retail use and for the potential new mixed uses.

5.0 Access

- 5.1 The site lies to the east of High Street at the southern end of the town apposite the Bridge Industrial Estate and immediately north-east of the Queich Bridge and through any redevelopment proposals it is proposed to retain the existing access to the site.
- 5.2 Historically the site has operated as a Car Auction Mart and Sunday Market/ Saturday Car Boot Sales site and in 2008, SMAG appointed Dougall Baillie Associates (DBA) to prepare a Transportation Statement for the proposed residential development.
- 5.3 The purpose of the report was to support application ref: 05/02457/FUL for residential development although it is also worth noting the findings of this report in relation to existing and any other proposed use of the site.
- 5.4 The report assessed the availability of bus services, parking provision and access to the site and aimed to identify the change in vehicle trips caused by the proposed redevelopment from the existing car auction/Sunday market/car boot sales uses to residential use. The report also considered the effects of this change on the local road network.
- 5.5 As way of background, it should be noted that the existing uses on site generate approximately 300,000 vehicle movements per annum.
- 5.6 The report concluded that public transport accessibility to the site is very good, with north and southbound bus stops located directly at the site entrance, and significantly, public transport modes present a viable alternative to the use of the private car by residents at the proposed development site. In this regard, the report notes that there are a considerable number of bus services to and from Kinross that can be accessed by residents or future retail users through any redevelopment of the site.
- 5.7 In terms of the application proposals for circa 200 houses, the local road network would comfortably accommodate the traffic predicted to be produced by the proposed residential development without any requirement for off-site road improvements.
- 5.8 Furthermore, analysis of the site access junction indicates that, under the proposed residential development, the junction would operate well within capacity.
- 5.9 As intimated above, 2007 saw the opening of a new Park and Ride facility on the western outskirts of the town next to Junction 6 of the M90. The site allows people to park up their cars or bikes for journeys to Edinburgh and Perth thereby relieving some of the congestion on the busy M90. It is served by both Scottish City link and Megabus.com express coach routes operating between Edinburgh and Perth and a number of local bus services also divert via Kinross Park and Ride site. This facility supports TACTRAN's Regional Transport Strategy objectives of reducing congestion, improving accessibility and promoting use of more sustainable options for commuter and other travel

demands.

- 5.10 In addition, the Kinross Link Road was approved by Perth & Kinross Council in August 2011 under planning reference 10/02175/FLL. Work started on the road the week beginning 19th March 2012 and is programmed to be complete in July 2012. The new road will provide a direct link to the Park & Ride facility at the junction between Station Road/Junction Road and the M90. Essentially, it will act as an inner relief road and allow traffic from the M90 easier access to the site and therefore remove traffic, including HGV's, from the town centre.

6.0 Services and Infrastructure

- 6.1 Water provision and water and wastewater removal remain the responsibility of Scottish Water. It is understood, however, that appropriate mains drainage provision is available and there are no current constraints. It is intended that a Sustainable Urban Drainage System be employed for the site's drainage.
- 6.2 In terms of the risk of flooding, the site is currently considered to be at risk of direct and indirect flooding from a 200-year flood event.
- 6.3 However, in satisfaction of this issue in relation to the above noted application ref: 05/02457/FUL, Jacobs Engineering UK Limited prepared and submitted a Flood Risk Assessment and concluded that appropriate measures can be put in place, without the need for third party land, to suitably address such an event with respect to Scottish Planning Policy.
- 6.4 The subject land is therefore deliverable.

7.0 Retail Impact

- 7.1 The consolidated SPP provides a statement of Scottish Government policy in respect of town centres and retailing. The SPP places emphasis on safeguarding the vitality and viability of the town centre and promotes a sequential approach to site selection for new retail developments. It indicates that the sequential approach should be used when selecting locations for all retail and commercial leisure uses unless the development plan identifies an exception. The sequential approach requires that locations are considered in the following order:
- Town centre;
 - Edge of town centre;
 - Other commercial centres identified in the development plan;
 - Out of centre locations that are or can be made easily accessible by a choice of transport modes.
- 7.2 We welcome the proposed Plans recognition that a significant proportion of the food retail spend for the town and the wider Kinross-shire area has leaked to Perth and towns in Fife, particularly Dunfermline and Glenrothes. Although the Sainsbury's store has improved this situation there remains an identified need to improve the retail offer in Kinross through the provision of a larger format supermarket with a wider product range close to the town centre.

- 7.3 We disagree that the old High School site in Kinross is considered to be the optimum site with potential to be redeveloped for a supermarket. The only justification that we can find for this is that “it is well related to the town centre” (PKC LDP MIR 2009). There is no detailed assessment of the opportunity to deliver retail or other uses on the site or indeed any assessment of the retail opportunity presented by the Scottish Motor Auction site.
- 7.4 What we do know is that the former High School is recognised by the Council as a key building within the Kinross Conservation Area and new proposals will be required to “consider” the retention of the listed building. We would suggest that the view of Historic Scotland will be that the listed building should not be demolished as its balanced arrangement of Dutch-gabled boys and girls entrances to the High Street will require to be retained. Within this context, i.e. retention of the historic buildings, the viability of securing major retail interest is questionable and at best, limited. In contrast the buildings on the SMAG are not considered fit for purpose, will be demolished and there is ongoing site interest from major retail operators.
- 7.5 With specific reference to the sequential test, it is clear that there are no other town centre sites suitable for a major retail use. Edge of town centre retail is therefore appropriate and it is recognised that both sites are a similar distance from the town centre.
- 7.6 Finally, the significant retail use of the current site is material in the ongoing consideration and reappraisal of future uses through this emerging Local Development Plan.

8.0 Sustainable Development

- 8.1 To deliver sustainable development, essential infrastructure needs to be in place or at least be capable of being delivered to support the development.
- 8.2 It is material that there are not considered to be any technical reasons why the Scottish Motor Auction site cannot be delivered for the proposed mixed uses. We see no evidence that the old High School site can similarly be delivered.

9.0 Local Development Plan Spatial Strategy

- 9.1 The Spatial Strategy of the Local Development Plan needs to build upon the TAYplan strategy by adding the additional level of detail considered more appropriate. The MIR identified the spatial issues as being Housing Land Supply and Distribution; Economic Development Land Supply and Distribution; Retailing; and Key Infrastructure. The subject land can embrace all these issues and deliver an appropriate level of development whilst not compromising the environmental carrying capacity of the settlement.

10.0 Summary

- 10.1 It is considered that the subject land presents a viable and significant opportunity for the creation of a sustainable windfall redevelopment site within the settlement of Kinross.

- 10.2 With the release of this land, i.e. mixed use retail, including supermarket use, and/or residential and employment development, it must be recognised that in line with the Adopted and the previous Draft Local Plan strategies, the opportunity exists to promote an integrated planning approach. All these aims accord with the current Structure Plan strategy and emerging TAYplan strategy.
- 10.3 Comprehensively masterplanned, a responsible view can be taken to a long-term solution to the delivery of historically planned growth for the settlement and Motor Auction (Properties) Limited would be happy to engage with Perth & Kinross Council on all aspects of the sites delivery.
- 10.4 It is therefore respectfully requested that the subject land be identified as a various use opportunity, including food and non-food retail and employment and housing uses, to effectively plan for the immediate, medium and long term future of Kinross and assist in the creation of a sustainable mixed community.

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

Name	Stewart Milne Homes Limited c/o Emac Planning LLP
Address and Postcode	Ballinard House, 3 Davidson Street, Broughty Ferry, Dundee, DD5 3AS
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or
Site ref.	Cross Tay Link Road (Embargo on A93/A94)	or
Chapter	<input type="text"/>	Page no. <input type="text"/> Paragraph no. <input type="text"/>

5.1.17(1)

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

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

Please see attached statement

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

Please see attached statement

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PERTH AND KINROSS LOCAL DEVELOPMENT PLAN

REPRESENTATION ON BEHALF OF
STEWART MILNE HOMES LIMITED

CROSS TAY LINK ROAD: EMBARGO ON A93/A94 (PARA 5.1.17(1))



BALLINARD HOUSE, 3 DAVIDSON STREET, BROUGHTY FERRY, DUNDEE DD5 3AS
APRIL 2012

Client: Stewart Milne Homes Limited

Issue: Cross Tay Link Road Embargo on A93/A94 Corridors (Para 5.1.17(1)):

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1.0 Introduction

- 1.1 This submission is made on behalf of Stewart Milne Homes Limited in response to the publication of the Proposed Local Development Plan.
- 1.2 The following statement sets out Stewart Milne Homes Limited's position in relation to the embargo on planning consents for further greenfield housing for sites of 10 or more outwith Perth on the A93 & A94 corridors until such time as the construction of the Cross Tay Link Road is a committed project. Proposed Plan paragraph 5.1.17(1) refers. Stewart Milne Homes Limited object to this as an unreasonable constraint to the timely delivery of an appropriate and required housing land supply by SPP and TAYplan.
- 1.3 The Proposed Plan provides no indications of timescale for the lifting of the embargo and there is no definitive action that will determine what is a "committed project". The only indication of timescale that can be found is in the Draft Action Programme where 2020 is listed under the heading "timescale" but with no further explanation of what will happen then. Whether this is the date of committing, commencement or completion of the project is unclear.
- 1.4 Strategically, it is material that representations have been submitted to the TAYplan from Homes for Scotland and others, including Stewart Milne Homes Limited, suggesting that the TAYplan should set more ambitious growth targets and recognise that smaller settlements, not currently identified in the settlement hierarchy, can contribute to the requirement for growth where identified within a Local Development Plan. These strategic policies, Local Development Plan proposals and third party representations are all influenced and unreasonably constrained by an embargo with a seemingly unclear action and timeframe for resolution.

2.0 Housing Land Supply

- 2.1 It is noted that the Plan states that the biggest single constraint facing the Perth Area is the capacity of the roads infrastructure in and around Perth. The Council has commissioned traffic modelling work for the Perth area and is looking at solutions which will remove constraints to ensure that the national trunk road network is not compromised.

- 2.2 One of the package of measures identified is the Cross Tay Link Road which connects the A9 to the A93 & A94, i.e. requiring the construction of a new bridge across the River Tay north of Perth. There is no indication of timescale or commitment to this project although it is noted with some concern that this embargo, and the embargo on the A85 corridor to the west of Perth, affects the majority of housing sites in the Perth Area which is the strongest housing market area within the Plan.
- 2.3 As the lifting of the A93/A94 embargo has no definitive timeframe for resolution it is therefore impossible to proceed with viable development proposals or calculate the Council's commitment to maintaining the desired 7 year effective land supply as set out in para 5.1.11 of the Proposed Plan.
- 2.4 Paragraph 66 of Scottish Planning Policy (SPP) states that the Scottish Government is committed to increasing the supply of new homes and the planning system should contribute to raising the rate of new house building by identifying a generous supply of land for the provision and range of housing in the right places.
- 2.5 Paragraph 70 of the SPP goes onto reaffirm that the delivery of housing through the development plan to support the creation of sustainable mixed communities depends on this generous supply of appropriate and effective sites being made available to meet need and demand and on the timely release of allocated sites.
- 2.6 The effect being that the allocation of a generous supply of land for housing in the Development Plan will give the flexibility necessary for the continued delivery of new housing – even if unpredictable changes to the effective land supply occur during the life of the Plan. [SPP para 71].
- 2.7 Full consideration of the scale and location of the housing land requirement in development plans well ahead of land being required for development should assist in aligning the investment decisions of developers, infrastructure providers and others.

- 2.8 It is therefore essential that appropriate and early release of housing can be facilitated through this Local Development Plan to ensure that the final TAYplan housing land requirement is met.
- 2.9 Homes for Scotland, Stewart Milne Homes and others will continue to work with Perth & Kinross Council to develop funding models that may help deliver infrastructure. However, we remain deeply concerned that the Proposed Plan relies heavily on housing land releases that are embargoed until such time as major infrastructure works are committed projects. It may be that Perth & Kinross Council have to take a pragmatic approach to ensure the delivery of housing land supply in the form of short to medium term pain.
- 2.10 Paragraph 4.3.14 of the Proposed Plan seeks to take a long-term view to meet housing land requirements and we would agree that the strategic sites will take time to deliver. However, what is not clear is the short-term plan to maintain a 5-year effective land supply at all times. A table is required within this chapter to demonstrate that the annual numbers will deliver this. This should be broken down into private and affordable housing, with annual figures for each, demonstrating that their allocations deliver the final housing requirement when set.
- 2.11 Paragraph 5.1.9 of the Proposed Plan seeks to set out how the current Proposed TAYplan requirement of approximately 510 houses per year will be facilitated. The tables provided in paragraph 5.1.10 and 5.1.11 shed very little light however on how this will be achieved. This is a combination of lack of information and the presentation and calculation of that information.
- 2.12 First, the tables should be split into 5-year periods to ensure that a full analysis can be undertaken of the identified sites ability to timeously deliver the housing requirement. The current presentation of information masks any potential problems in delivery. Second, windfall allowances should not be included. Such sites can only be included where they have planning permission and are considered to be effective. Third, any sites that are subject to a constraint/embargo should be highlighted and the timescale for the lifting of that constraint/embargo identified. Only then can a full analysis be undertaken of the effectiveness of individual sites and the ability

or not of these sites to fulfil the housing land requirement and whether additional sites require to be identified.

3.0 Deliverability

- 3.1 It is considered that the various sites, such as that promoted by Stewart Milne Homes at Burrelton, present viable and significant opportunities at a variety of scales for the creation of sustainable housing and mixed-use expansion to settlements throughout Perth & Kinross.
- 3.2 This cannot be achieved however with the imposition of an embargo to development, the lifting of which is outwith the control of developers seeking to implement sites which are otherwise technically and commercially viable.
- 3.3 With the release of the various land opportunities, i.e. for further housing and potentially employment development, it must be recognised that the opportunity exists to resolve settlement drainage constraints; fund necessary school improvements; promote the provision of an appropriate level of affordable housing; assist the local economy; and promote an integrated approach to improvements through environmental and traffic management. This cannot be delivered with the imposition of an unreasonable embargo to development.

4.0 Developer Contributions

- 4.1 Paragraph 71 of the SPP states that consideration of the scale and location of housing land in development plans must be made well ahead of land being required for development. This is essential to assist in the alignment of investment decisions of developers and infrastructure providers.
- 4.2 However, the necessity to plan ahead and make strategic infrastructure decisions should not be left open to misuse.
- 4.3 In the current financial climate it is essential that new development be encouraged in areas where existing infrastructure capacity already exists in the first instance. Where the need for investment is proven there must be a relationship with the contribution being asked for and this must be fairly and

reasonably related in scale and kind to the proposed development and in line with Circular 1/2010 'Planning Agreements'.

- 4.4 Notwithstanding this clear policy requirement, it is increasingly becoming of concern that the cumulative burden of the range of developer requirements that are emerging throughout Scotland will render a large number of new developments unviable. It is critical therefore that this policy framework is realistic and sites are deliverable in the required timescale.
- 4.5 Circular 1/10: Planning Agreements informs that the Development Plan should be the point at which consideration of the potential need for and use of planning agreements begins. Planning Authorities should include policies on the use of planning agreements in their development plans. These create an opportunity to involve the local community and the development industry in the process of policy development and the associated supplementary guidance and to clarify early the expected levels of contributions that might be sought from developers. [Circular 1/10: Planning Agreements].
- 4.6 When drafting their Development Plans and associated Supplementary Guidance planning authorities should therefore work with infrastructure providers, other local authority departments and consultees to undertake a robust assessment of infrastructure requirements, the funding implications and the timescales involved.
- 4.7 This Local Development Plan, i.e. the Proposed Plan itself must provide clear policy direction and we are critical of the approach where the Plan states that Developer Contributions will be required towards transport infrastructure although details of this are not yet clear. What is clear however is that £140 million worth of infrastructure cannot easily be funded from developer contributions from 7240 houses. With the doubt over when the embargo on the A93/A94 corridors will be lifted, i.e. when infrastructure improvement projects become "committed", the lack of clarity as to whether commercial developments require to contribute, and the lack of demonstrable detriment when problems already exist, the danger is that the vast majority of housing sites, which are otherwise considered to be effective, will simply remain undeveloped.

5.0 Proposed Change

- 5.1 It is fundamental to the planning system, the Scottish economy and the Perth regional economy that housing land is timeously delivered and Perth & Kinross Council should be looking at ways in which development can be delivered, not constrained.
- 5.2 Short to medium term concessions will be necessary and it is likely that smaller sites or parts of larger sites can be released without net detriment caused to the overall infrastructure network. By way of comparison, Aberdeen City Council and Aberdeenshire Council have taken a similar approach in advance of the delivery of the AWPR.
- 5.2 A 'trigger' policy with clear criteria should therefore be added to the Proposed Plan to allow sites to come forward when, in all other respects, they are deliverable.
- 5.3 Suggested solutions / triggers which should be considered include:
- No embargo.
 - If an embargo is imposed, can it be lifted earlier and within a certain timeframe, i.e. when land supply drops below a certain level and/or a length of time from adoption of Local Development Plan, for example, i.e. 2 years from 2014. The point being that if the Cross Tay Link Road doesn't happen or is delayed, surely not to develop any significant greenfield housing in these corridors is not an option.
 - Can exceptions be made to any embargo to allow sites to be released which are in all other respects deliverable and offer transport choice in terms of proximity to bus route and ease of access to Scone Park & Ride, e.g. Burrelton.
 - Can exceptions be made to housing sites with a history of allocation through a previous Local Plan, i.e. this commitment has already been taken into account in the traffic impact calculations and there should therefore be no impediment to delivery.

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

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

Name	Muir Homes Ltd
Address and Postcode	per Muir Smith Evans 203 Bath Street Glasgow G2 4HZ
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.	Auchterarder Sports Facilities	or			
Site ref.		or			
Chapter	8	Page no.	245 - 247	Paragraph no.	8.2

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.

Muir Homes Ltd wishes to see a change to the plan. Muir Homes Ltd therefore objects to the plan.

Specifically, Muir Homes submits that the plan for Auchterarder (after page 246) misrepresents the area which should be allocated for sports facilities. The stated area is adjacent to the northwestern corner of 'Development Framework Site 1'. Muir Homes submits that the plan should be amended to reflect the definition of the relevant area as set out in the Section 75 Agreement (see below), or alternatively to reflect the definition of the relevant area in the Development Framework (see below).

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

As supporting information, Muir Homes notes the following:

(1) The green area referred to above is significantly different in terms of its boundaries and scale when compared to the area defined in the P&KC's supplementary planning guidance as contained within the Castlemains & Kirkton Development Framework (see accompanying Appendix 1); and

(2) The green area referred to above is also significantly different in terms of its boundaries and scale when compared to the terms of the Section 75 Agreement with P&KC, which is about to be signed (see accompanying Appendix 2).

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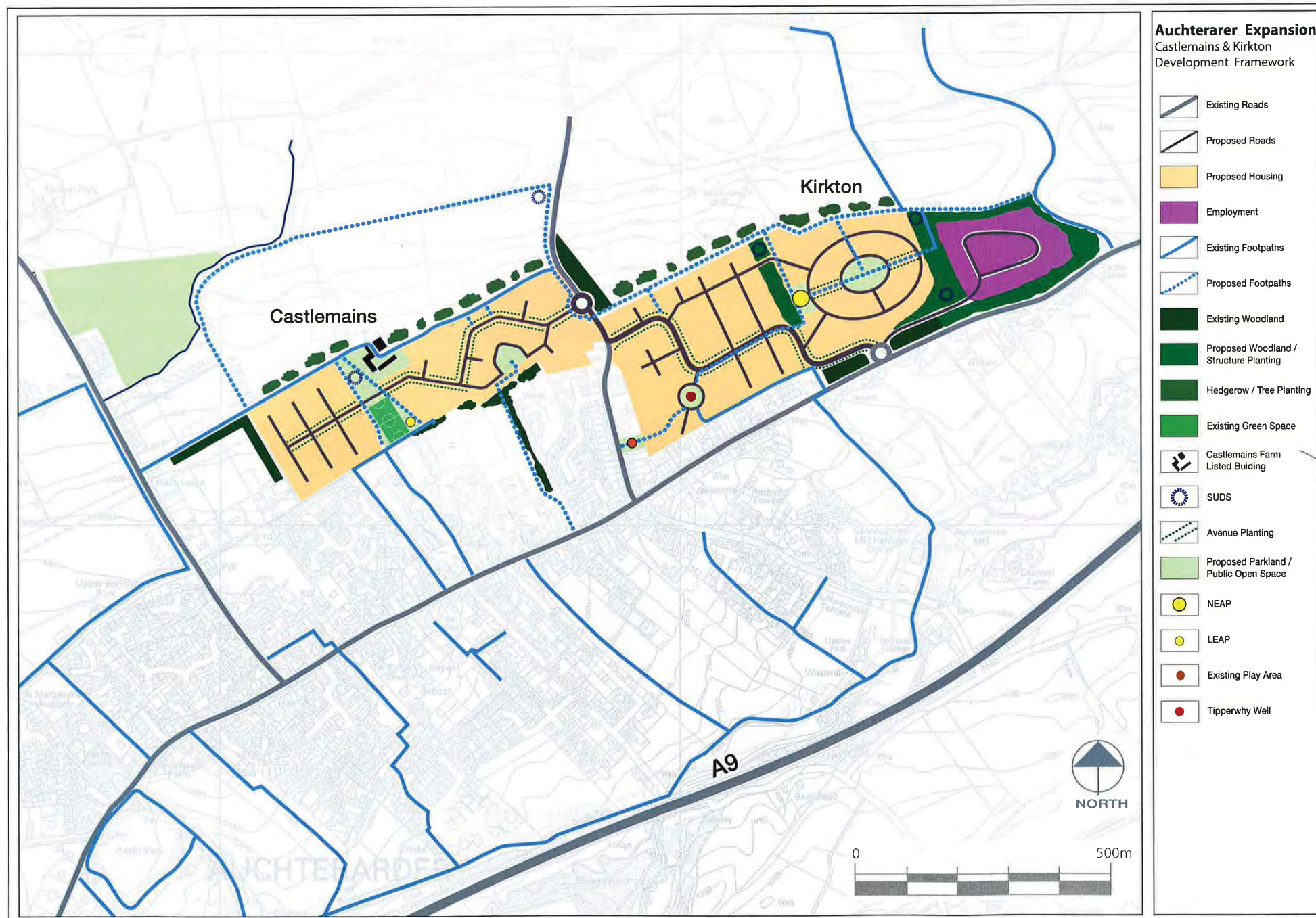
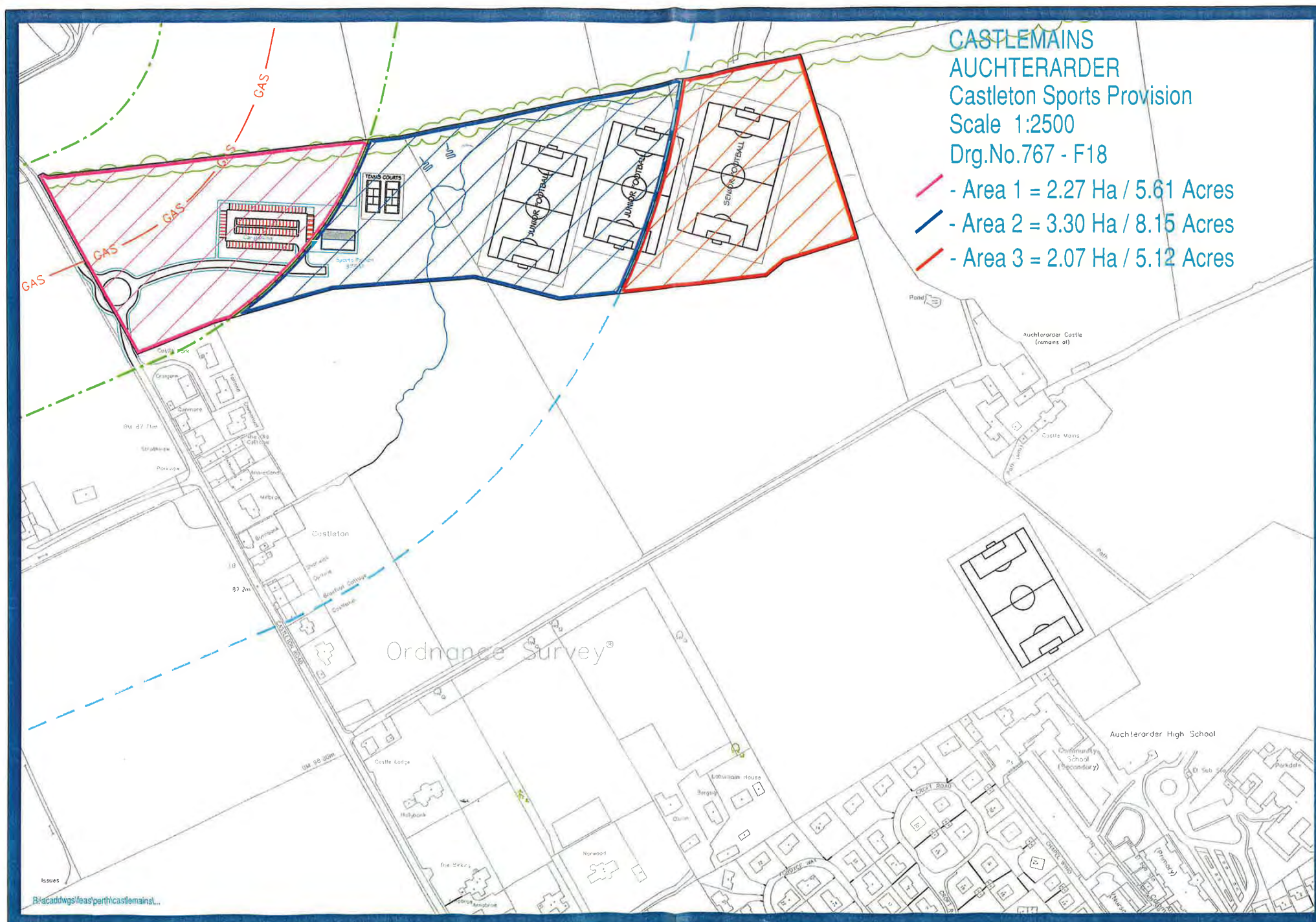


Figure 42. Castlemains & Kirkton Development Framework Plan



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

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Name	Muir Homes Ltd
Address and Postcode	per Muir Smith Evans 203 Bath Street Glasgow G2 4HZ
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	H10 (Abernethy)	or			
Chapter	5	Page no.	84 - 86	Paragraph no.	5.4

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.

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

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Address and Postcode	per Muir Smith Evans 203 Bath Street Glasgow G2 4HZ
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	H24	or			
Chapter	5	Page no.	122-123	Paragraph no.	5.23

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.

Muir Homes Ltd wishes to see change in the plan. Muir Homes Ltd therefore objects to the plan.

Specifically, an objection is lodged in relation to the allocation of site H24 within the Proposed Plan. It is submitted that site H24 should be deleted from the Plan and that the site promoted by Muir Homes at the Call for Sites and MIR stages should be allocated instead.

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

(1) Overview

It is submitted that there are insufficient sound planning reasons for the allocation of site H24 within the Proposed Plan.

Conversely, it is submitted that there are more sound planning reasons for the allocation of the site promoted by Muir Homes at the MIR stage of the LDP.

(2) Context

For ease of reference, site H24 is related to Site 503 at the MIR stage. The site promoted by Muir Homes is related to Site 502 at the MIR stage.

(In relation to Site 502, it should be noted that the council's MIR inaccurately represented Muir Homes' submission from the Call for Sites stage. Muir Homes consider that this (unintentional) misrepresentation adversely affected a proper consideration of Site 502 at the MIR and Proposed Plan stages, leading to the site promoted by Muir Homes being unreasonably rejected for the Proposed Plan.)

It is noted that, at this stage of the Proposed Plan, the council has not produced or published any document which explains the process which was applied to assessing the merits of the competing sites, nor any explanation as to why the site allocated was eventually chosen. The council has confirmed that that no such documents exist. The council has supplied the only relevant document for Inchture (attached as Appendix A to this submission). Muir Homes submits that this represents a wholly inadequate approach to the assessment of the relevant competing sites, particularly in the context of the submissions made by Muir Homes at the MIR stage, submissions which have simply not been acknowledged. Finally, it is noted that the document attached as Appendix A is not available on the council's website, and had to be requested.

(3) Representations and objection

(See paper apart)

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Perth & Kinross Local Development Plan**Proposed Plan****Representations**

**Submitted by Muir Smith Evans on behalf of Muir Homes Limited
April 2012**

Land at Inchtute**PAPER APART (3 pages)**

The Call for Sites stage

On 26 June 2009, Muir Smith Evans, on behalf of Muir Homes Limited, submitted a representation which proposed the release of a small area of land at Inchtute. This was at the Call for Sites stage.

Muir Homes Limited (MHL) stated that the identified site had the potential for a final phase of the overall development, previously approved at Inchtute (being developed by both MHL and Barratt).

MHL stated that, depending on the density and layouts which may be appropriate, it was estimated that the proposed site could accommodate between 20 and 30 units.

The Main Issues Report stage

The Main Issues Report showed two sites in Inchtute on which the council received representations at the Call for Sites stage.

Site 502 was based on the submission made by MHL in 2009 (see above). Site 503, was promoted by another party.

MHL, as part of its submissions in relation to the MIR, noted that, as a point of fact, Site 502 as delineated on the MIR plan misrepresented the original submission made by MHL. The site shown in the Main Issues Report was far larger (almost twice the size) of the site promoted by MHL. MHL also noted that the OS base plan used for Inchtute in the MIR plan was not up to date and did not include the housing which has been developed at Inchtute in recent years. The plan also did not take into account further residential development which has planning permission that had not yet been developed.

Attached to this Paper Apart is a copy of the plan submitted by MHL at the MIR stage. It shows, delineated in green, the actual land which had been promoted by MHL and, delineated and hatched in blue, the land which has actually been developed or has planning permission for development.

The Main Issues Report contained two Strategy Options for the Perth residential area, within which Inchtute is situated. Both of these options showed Inchtute being allocated for 15 housing units. The maps and tables referred to are on pages 73 – 75 of the MIR.

Submission by Muir Homes Limited in relation to Proposed Plan

Firstly, it is necessary to repeat the correction of the misrepresentation of the area of land originally promoted by MHL for housing land release, and to highlight the fact that the Proposed Plan continues to use the out of date OS plan.

Secondly, it is important to note that although MHL indicated, in the 2009 submission, that the site being promoted may be capable of taking 20-30 units (depending on the density) the actual number of units was a matter which was considered to be open for discussion with the council. In other words, a quantum of 15 (in line with the Strategy Options) is possible.

MHL notes that, in assessing the two sites (502 and 503) at the MIR stage, the assessment tables concludes that Site 503 accords with the Spatial Strategy (referred to above) but Site 502 does not. MHL was not been able to find any justification for such a conclusion within the MIR. The spatial strategy allocates 15 housing units to Inchtute. It does not indicate any preference for specific sites within the settlement.

It is the submission of MHL that, taking into account all of the above (including the area which is already being developed or is about to be developed), it makes far more sense in terms of the structure of the settlement of Inchtute to release the land being suggested by MHL (delineated in green on the attached plan) than it does to release Site H24 (previously Site 503 in the MIR). The site proposed by MHL would make much more sense in terms of integration with the existing development pattern and infrastructure as compared to Site H24 which is detached from the existing built-up areas.

In further support of this position, MHL notes that, at the MIR stage, the council's Site Assessment table for Site 503 (now H24) to concluded that the site has no infrastructure constraints. MHL submits that it is misleading. MHL has detailed knowledge of Inchtute, and submits that Site H24 (previously Site 503) **will** have constraints in relation to drainage, due (1) to the location of the site, (2) the level of the site in relation to other infrastructure in the area, and (3) the reluctance of Scottish Water to allow for more pumping for drainage in Inchtute.

In further support of this position, it should be noted that the area delineated in green takes account of the landscape form and the tree belts which currently exist.

Conclusion

MHL strongly contests the basis in which the council has arrived at the expression of a preference for Site H24 (previously Site 503).

MHL objects to the allocation of Site H24, submits that it should be deleted, and requests that the area delineated in green on the attached plan (effectively a reduced Site 502) should become the preferred allocation, in the Proposed Plan for further housing development in Inchtute.

In this respect, MHL would be content with this site being attributed an allocation of 15 housing units, in line with the Spatial Strategy referred to above.

(Paper apart ends)

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

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	H24	or			
Chapter	5	Page no.	122-123	Paragraph no.	5.23

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

Muir Homes Ltd wishes to see change in the plan. Muir Homes Ltd therefore objects to the plan.

Specifically, an objection is lodged in relation to the allocation of site H24 within the Proposed Plan. It is submitted that site H24 should be deleted from the Plan and that the site promoted by Muir Homes at the Call for Sites and MIR stages should be allocated instead.

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

(1) Overview

It is submitted that there are insufficient sound planning reasons for the allocation of site H24 within the Proposed Plan.

Conversely, it is submitted that there are more sound planning reasons for the allocation of the site promoted by Muir Homes at the MIR stage of the LDP.

(2) Context

For ease of reference, site H24 is related to Site 503 at the MIR stage. The site promoted by Muir Homes is related to Site 502 at the MIR stage.

(In relation to Site 502, it should be noted that the council's MIR inaccurately represented Muir Homes' submission from the Call for Sites stage. Muir Homes consider that this (unintentional) misrepresentation adversely affected a proper consideration of Site 502 at the MIR and Proposed Plan stages, leading to the site promoted by Muir Homes being unreasonably rejected for the Proposed Plan.)

It is noted that, at this stage of the Proposed Plan, the council has not produced or published any document which explains the process which was applied to assessing the merits of the competing sites, nor any explanation as to why the site allocated was eventually chosen. The council has confirmed that that no such documents exist. The council has supplied the only relevant document for Inchture (attached as Appendix A to this submission). Muir Homes submits that this represents a wholly inadequate approach to the assessment of the relevant competing sites, particularly in the context of the submissions made by Muir Homes at the MIR stage, submissions which have simply not been acknowledged. Finally, it is noted that the document attached as Appendix A is not available on the council's website, and had to be requested.

(3) Representations and objection

(See paper apart)

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Synopsis of representations - Abernethy	Response
Twelve representations on eight sites, Site 018 water supply issues above 50m contour, Site 021 one rep in support, Site 024 one rep in support, Site 025 one rep in support, Site 026 evaluation of archaeological potential mitigation may be required, Site 866 one rep in support, Site 997 one representation against (in support of a site at Longforgan), Scottish water indicate that the water treatment works have capacity no known flooding issues but further network investigations may be required.	Abernethy is a large village outside the core area with a good range of local services. The strategy of the plan is to concentrate the majority of development in the core area. Outside the core more limited development is allowed in the larger settlements where there are a range of services. Abernethy falls into this category and the plan identifies four housing sites for 132 houses and 0.5ha of employment land together with an open space framework for the village. The sites identified represent the best locations for appropriate expansion of the village during the life of the Plan

Synopsis of representations - Inchtute	Response
Four representations on two sites (502 & 503) indicating support for their identification with Scottish water indicating that network investigations are required and one indicating that archaeological evaluation may be necessary .	Inchtute is a large village outside the core area with a good range of local services. The village also lies in the Carse where TAYplan allows only limited development. The strategy of the plan is to concentrate the majority of development in the core area. Outside the core more limited development is allowed in the larger settlements where there are a range of services. While Inchtute falls into this category its location in the Carse means that only one small infill site for 16 houses well located to village facilities has been allocated in the plan.

Perth & Kinross Local Development Plan**Proposed Plan****Representations**

**Submitted by Muir Smith Evans on behalf of Muir Homes Limited
April 2012**

Land at Inchtute

PAPER APART (3 pages)

The Call for Sites stage

On 26 June 2009, Muir Smith Evans, on behalf of Muir Homes Limited, submitted a representation which proposed the release of a small area of land at Inchtute. This was at the Call for Sites stage.

Muir Homes Limited (MHL) stated that the identified site had the potential for a final phase of the overall development, previously approved at Inchtute (being developed by both MHL and Barratt).

MHL stated that, depending on the density and layouts which may be appropriate, it was estimated that the proposed site could accommodate between 20 and 30 units.

The Main Issues Report stage

The Main Issues Report showed two sites in Inchtute on which the council received representations at the Call for Sites stage.

Site 502 was based on the submission made by MHL in 2009 (see above). Site 503, was promoted by another party.

MHL, as part of its submissions in relation to the MIR, noted that, as a point of fact, Site 502 as delineated on the MIR plan misrepresented the original submission made by MHL. The site shown in the Main Issues Report was far larger (almost twice the size) of the site promoted by MHL. MHL also noted that the OS base plan used for Inchtute in the MIR plan was not up to date and did not include the housing which has been developed at Inchtute in recent years. The plan also did not take into account further residential development which has planning permission that had not yet been developed.

Attached to this Paper Apart is a copy of the plan submitted by MHL at the MIR stage. It shows, delineated in green, the actual land which had been promoted by MHL and, delineated and hatched in blue, the land which has actually been developed or has planning permission for development.

The Main Issues Report contained two Strategy Options for the Perth residential area, within which Inchtute is situated. Both of these options showed Inchtute being allocated for 15 housing units. The maps and tables referred to are on pages 73 – 75 of the MIR.

Submission by Muir Homes Limited in relation to Proposed Plan

Firstly, it is necessary to repeat the correction of the misrepresentation of the area of land originally promoted by MHL for housing land release, and to highlight the fact that the Proposed Plan continues to use the out of date OS plan.

Secondly, it is important to note that although MHL indicated, in the 2009 submission, that the site being promoted may be capable of taking 20-30 units (depending on the density) the actual number of units was a matter which was considered to be open for discussion with the council. In other words, a quantum of 15 (in line with the Strategy Options) is possible.

MHL notes that, in assessing the two sites (502 and 503) at the MIR stage, the assessment tables concludes that Site 503 accords with the Spatial Strategy (referred to above) but Site 502 does not. MHL was not been able to find any justification for such a conclusion within the MIR. The spatial strategy allocates 15 housing units to Inchtute. It does not indicate any preference for specific sites within the settlement.

It is the submission of MHL that, taking into account all of the above (including the area which is already being developed or is about to be developed), it makes far more sense in terms of the structure of the settlement of Inchtute to release the land being suggested by MHL (delineated in green on the attached plan) than it does to release Site H24 (previously Site 503 in the MIR). The site proposed by MHL would make much more sense in terms of integration with the existing development pattern and infrastructure as compared to Site H24 which is detached from the existing built-up areas.

In further support of this position, MHL notes that, at the MIR stage, the council's Site Assessment table for Site 503 (now H24) to concluded that the site has no infrastructure constraints. MHL submits that it is misleading. MHL has detailed knowledge of Inchtute, and submits that Site H24 (previously Site 503) **will** have constraints in relation to drainage, due (1) to the location of the site, (2) the level of the site in relation to other infrastructure in the area, and (3) the reluctance of Scottish Water to allow for more pumping for drainage in Inchtute.

In further support of this position, it should be noted that the area delineated in green takes account of the landscape form and the tree belts which currently exist.

Conclusion

MHL strongly contests the basis in which the council has arrived at the expression of a preference for Site H24 (previously Site 503).

MHL objects to the allocation of Site H24, submits that it should be deleted, and requests that the area delineated in green on the attached plan (effectively a reduced Site 502) should become the preferred allocation, in the Proposed Plan for further housing development in Inchtute.

In this respect, MHL would be content with this site being attributed an allocation of 15 housing units, in line with the Spatial Strategy referred to above.

(Paper apart ends)

Inchture

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Address and Postcode	per Muir Smith Evans 203 Bath Street Glasgow G2 4HZ
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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.	Overall policy approach to Strathearn / Auchterarder	or			
Site ref.		or			
Chapter	8	Page no.	239 - 247	Paragraph no.	8.1 & 8.2

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.

Muir Homes Ltd wishes to see a change to the plan. Muir Homes Ltd therefore objects to the plan.

Specifically, Muir Homes submits that the LDP needs to think ahead regarding how the future development of Auchterarder, during the next 15-25 years, might best be achieved in terms of the proper planning of the settlement as a whole and in terms of the provision and funding of infrastructure. Muir Homes submits that its previous representations made at various stages of the development process during the past 5 years remain relevant and should be incorporated in an amended Proposed Plan.

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

As supporting information, Muir Homes attaches a copy of the submission made to the council at the Main Issues Report stage (February 2011).

Muir Homes considers that the case set out within that document remains cogent and relevant and therefore adopts the copy document as supporting information.

In particular, Muir Homes:

(1) challenges the balance of land allocation between Crieff and Auchterarder, for all the reasons previously stated and set out in the above document; and

(2) highlights the merits of the allocating the sites promoted by Muir Homes as representing a common-sense approach to the likely future requirements of infrastructure within and surrounding the settlement.

In addition, it is noted that, at this stage of the Proposed Plan, the council has not produced or published any document which explains the process which was applied to assessing the merits of the competing sites, nor any explanation as to why the allocations promoted were eventually chosen. The council has confirmed that that no such documents exist. The council has supplied the only relevant document for Auchterarder (attached as Appendix A to this submission). Muir Homes submits that this represents a wholly inadequate approach to the assessment of the relevant competing sites, particularly in the context of the submissions made by Muir Homes at the MIR stage, submissions which have simply not been acknowledged. Finally, it is noted that the document attached as Appendix A is not available on the council's website, and had to be requested.

See attached copy document (from the MIR stage) as referred to above.

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

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

2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	Op7 (Newton Farm)	or			
Chapter	5	Page no.	80	Paragraph no.	N/A

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

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

Episo Boxes suggests that the text which reads "(Subject to retail impact assessment revealing capacity)" should be replaced with the following text: "(Subject to a retail impact assessment and a sequential assessment in relation to any floorspace which proposed the sale of comparison goods)".

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

Retail impact and capacity are two different concepts. They should not be linked the way they are in the current wording in the Proposed Plan.

If the council wishes to adopt a capacity approach, this should have been undertaken before the publication of the Proposed Plan. The identification of the Op7 site as being suitable for retail must be taken as an indication that the council has no problems with capacity (and the MIR previously gave an indication that this was so, particularly in relation to the requirement for a site for convenience retailing).

Retail impact does, on the other hand, remain a relevant consideration of specific development proposals which are the subject of future planning applications.

The addition of the sequential approach wording would make clear that the identification of the Op7 site as having potential for retail use does not superseded the sequential approach in relation to comparison goods.

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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	Episo Boxes LP
Address and Postcode	per Muir Smith Evans 203 Bath Street Glasgow G2 4HZ
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.	N/A	or			
Site ref.	St Catherine's Retail Park (North)	or			
Chapter	5	Page no.	75 & 76	Paragraph no.	5.2.4 (Retailing)

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.

Episo Boxes LP welcomes the Proposed Plan's identification of St Catherine's Retail Park as a Commercial Centre, and of the importance of the retail park as part of Perth's strategic shopping offer.

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