

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](mailto: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 10<sup>th</sup> 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.

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

Name	David Horsfall / DACH Planning
Address and Postcode	South Lodge, Glendelvine, PH1 4JN
Telephone no.	[REDACTED]
Email address	[REDACTED]

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

### 2. Which document are you making a representation on?

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

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

N/A

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

Policy ref.		or
Site ref.	Forgandenny – H22 County Place	or
Chapter	5	Page no. 115-116 Paragraph no. All

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.

N/A

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

These representations are in support of the allocation of Site H22, County Place. The landowner would like to bring this site forward for development and would like to work with Perth and Kinross Council and the local community to create a quality residential environment.

New homes in this location would be compatible with the neighbouring land use and development in this location would represent a logical approach to the settlement strategy for Forgandenny. These new homes will help to sustain the community and local businesses and will contribute towards the housing need and demand.

This site is highly marketable and fully deliverable and will result in a high quality living environment within a landscape form capable of absorbing the development.

(Continued on attached paper)

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**Representations to the Perth and Kinross Local Development Plan – Proposed Plan**

**Section 1**

David Horsfall  
South Lodge, Glendelvine, PH1 4JN



**Section 2**

Representations to the PKC Proposed Plan

**Section 3**

Policy Reference: Forgandenny – H22 County Place

Site reference:

Chapter : 5 Spatial Strategy (Perth Area)

Page No: 115- 116

Paragraph:

**Section 4 – What is your representation**

Are you supporting the plan – yes

Would you like to see a change to the plan - No

These representations are in support of the allocation of Site H22, County Place. The landowner would like to bring this site forward for development and would like to work with Perth and Kinross Council and the local community to create a quality residential environment.

New homes in this location would be compatible with the neighbouring land use and development in this location would represent a logical approach to the settlement strategy for Forgandenny. These new homes will help to sustain the community and local businesses and will contribute towards the housing need and demand.

This site is highly marketable and fully deliverable and will result in a high quality living environment within a landscape form capable of absorbing the development.

### Reasons for supporting the plan

#### **Introduction**

The Fotheringham family have owned and farmed the site referred to as County Place (Ref H22) for over 50 years and they are happy for this land to come forward for housing development. The Fotheringham family also own the ground to the west of H22 and additional land could be made available if required.

Development of 30 new homes in this location would be compatible with the existing residential use and the economic benefits arising from this scheme would be a material consideration in support of this land allocation.

The Fotheringham Family would like to engage with the local community to agree the design principles before there is any developer involvement. The purpose of this early consultation exercise would be to give the local community the chance to influence the scheme and to open up channel of communication from the outset.

#### **Response to concerns raised by the local community**

A public meeting was held in Forgandenny Village Hall on Thursday 8<sup>th</sup> March 2012 in which a number of queries were raised about the nature of the proposed development. The following section will now consider these concerns.

#### Consultation

*Members of the community voiced concerns about the consultation process that had been undertaken by Perth and Kinross Council in relation to the proposed housing land allocation at H22 County Place.*

From the comments that were made it was clear that there are some misunderstandings about the new procedures brought forward under the 2009 Planning etc (Scotland) act and this confusion appeared to have eroded the trust and confidence of local residents.

The support of the local community is very important to the land owner and as a result they intend to consult with the local community at the earliest opportunity. Local residents will be given the opportunity to influence the design and layout. This consultation will also be used to discuss policies and government guidance that inform development in this location.

### Appearance of the Proposed Development

*Concerns were raised by members of the community about the height, scale, massing, layout and density of the new development in comparison to buildings in the surrounding area.*

New homes in this location will be developed to accord with policy PM2 of the emerging plan as well as Planning Advice Note 68 and Designing Streets. The impact of the proposed development upon the surrounding area will be evaluated early on within the design process and attention will be given to all of the design considerations raised by local residents.

### Affordable Housing

*The community group voiced concerns about the social considerations that could come about if a large number of affordable homes were built in this location.*

Advice on the need for affordable housing will be discussed with Perth and Kinross Council in accordance with Scottish Government Guidance and relevant information contained within the housing land audit. The land owner hopes to create a place with a well integrated mix of well designed new homes of different type and tenures.

### Density of Development

*The community group was concerned about the idea of a high density housing site that could have an adverse impact on the character of the village.*

The land owner intends to create a high quality residential environment informed by the local community, design professionals and practical guidance. The density of new development will be determined in relation to the character of the village and its setting, surrounding landscape and topography.

### Sewerage and Drainage

*The community raised concerns about drainage in this location and the possibility of flooding from new hard surfacing.*

Provision will be made for the proper disposal of surface water and sewerage. The land owner is not aware of any significant pluvial flooding that could prevent development in this location. Drainage will be assessed in further detail as part of the planning application process.

In accordance with SPP paragraph 197 and the Proposed Plan policy EP3C, the impermeable surface will be kept to a minimum and will include a Sustainable Urban Drainage System (SUDS).

### Loss of prime agricultural land

*The community discussed the existing agricultural use and whether or not the loss of agricultural land would be acceptable in this location.*

The agricultural land in this location falls within the category of 2(s) Prime Quality Land. This type of land is described as '*land capable of producing a wide range of crops with soil limitations*'. This assessment is consistent with the view of the land owner who confirms that the land cannot sustain cropping continually and is similar to much of land surrounding Forgandenny. At the time of writing these representations the ground is being used for grazing.

### **Conclusion**

Site H22, County Place, should be included within the forthcoming Local development Plan as this site offers the potential for the creation of a high quality living environment within a landscape form capable of absorbing the development.

The land owner intends to work with the local community and Perth and Kinross Council to bring forward a high quality development that will promote greener lifestyles and improve the character of the area. The development is also capable of contributing towards community infrastructure including public space, play facilities and additional car parking for the village hall.

The housing land strategy within this local development plan states that the current economic downturn is having a fundamental impact on the housing market and confirms the need for an adequate supply of housing land to ensure that it will be possible to respond to any upturn in the market. This development site is capable of contributing towards this housing land strategy by bringing forward high quality new homes on a site that is highly marketable and fully deliverable.

End

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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.	Cromwell Park	or			
Site ref.	E6 Cromwell Park	or			
Chapter	5	Page no.	87-88	Paragraph no.	5.5 Cromwell Park

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 E6 on the proposals map should be extended to cover the 1.6ha plot, as shown outlined blue on the attached plan. The entire 2ha site (outlined red) should be re-allocated within the emerging Local Development Plan as a site suitable for renewable energy facilities and companies within the green technologies sector and should be renamed 'Cromwell Environmental Enterprise Park'.

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

DACH Planning work with companies developing renewable energy projects across the UK and believe that this site has significant potential for an environmental enterprise park that would attract businesses from the renewable energy and green technology sector. The attached representations set out relevant considerations in support of this proposal.

(see representations and associated plan attached)

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.

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## **Representations to the Perth and Kinross Local Development Plan – Proposed Plan**

### **Section 1**

David Horsfall DACH Planning  
South Lodge, Glendelvine, PH1 4JN



### **Section 2**

Representations to the PKC Proposed Plan

### **Section 3**

Policy Reference: Cromwell Park  
Site reference: E6 Cromwell Park  
Chapter: 5 Perth Area Spatial Strategy  
Page No: 87-88  
Paragraph: 5.5 Cromwell Park

### **Section 4**

#### **Changes that should be made to the plan**

The following changes should be made to site E6 Cromwell Park.

Site E6 on the proposals map should be extended to cover the 1.6ha plot as shown outlined blue on the attached plan.

The entire 2ha site (outlined red) should be re-allocated within the emerging Local Development Plan as a site suitable for renewable energy facilities and companies within the green technologies sector and should be renamed ***'Cromwell Environmental Enterprise Park'***.

This site includes a single 21,000sqft industrial building that will be included within the development strategy for the site. The remaining buildings within the area outlined in blue were built during World War II and are past the end of their useful life. These redundant buildings will be demolished to make way for new units that will be brought forward on a pre-let basis.

#### **Reasons for requesting changes**

DACH Planning work with companies developing renewable energy projects across the UK and believe that this site has significant potential for an environmental enterprise park that would attract businesses from the renewable energy and green technology sector. The following sections will consider relevant site specific considerations along with the terms of this

emerging development plan and material considerations in support of this proposal.

The site is located beside the settlement of Almondbank, some 4 miles west of Perth. It is attractive to companies looking to locate in the area as it is in a central location within Scotland close to the A9, providing quick and easy access to the rest of the country.

The property is in single ownership and includes further employment land to the north of the site, which is currently used for light industrial purposes (Class 4, 5 & 6) and occupied by West Cumberland Farmers - Phoenix and Cygnet PB Ltd. These representations relate only to the lower site shown within the area outlined red on the attached plan.

The site was previously occupied by two Bellman Hangers, a parachute store, inflammable store and a garage that was used by the Royal Navy during the Second World War. The two Bellman Hangers were demolished and a 21,000sqft portal frame hanger (Unit E) was built to replace one of the hangers in the 1980s. The other buildings that remain on site are no longer fit for purpose and much of the site is under-utilised. Recently Unit E was used for the storage of white goods, and before that for food storage and distribution.

Modern practices and needs require modern operating facilities and the landowner would like to clear these older buildings and bring forward a unique new development site in this location.

The existing access is capable of accommodating a development of this nature in terms of highway safety. Given that the site currently operates without restriction, it would be unreasonable to restrict this development. Any impact of noise and disturbance from any additional traffic to near by residents would be addressed as part of any future planning application

The following section will now consider material considerations that would reinforce the case for allocating this site for renewable and low carbon energy generation facilities, companies from the green technology sector and appropriate waste/resource management infrastructure.

### ***Scottish Planning Policy (SPP) February 2010***

SPP sets out the government's overarching planning policies on delivering sustainable development through the planning system.

Paragraph 33, SPP states that the planning system should proactively support development that will contribute to sustainable economic growth and that planning authorities should take a positive approach to development, recognising and responding to economic and financial conditions and considering proposals that could contribute to economic growth.

Paragraph 48 states that planning authorities should support and promote proposals to bring vacant or derelict land back into productive use for development or to create more attractive environments.

SPP paragraph 184 confirms that planning authorities should support the development of a wide range of renewable energy technologies and guide development to appropriate locations. This guidance goes on to state that development plans should support all scales of development associated with the generation of energy and heat from renewable sources. Development plans should support the wider application of medium and smaller scale renewable energy technologies such as decentralised energy supply systems.

Paragraph 193 states that development plans should identify sites with the potential to accommodate biomass facilities which can be supplied from locally available resources, and should identify the factors that will be considered when making decisions on planning applications.

### **TAYplan Proposed Plan – DRAFT**

The vision set out in TAYplan is: *‘By 2032 the TAYplan region will be sustainable, more attractive, competitive and vibrant without creating an unacceptable burden on the planet. The quality of life will make it a place of first choice where more people choose to live, work and visit, and where businesses choose to invest and create jobs’*

This draft document directs local authorities to strengthen the economic base to support the renewable energy sector, improve accessibility to jobs and services. This document also supports a shift to a zero carbon waste economy by providing appropriate infrastructure.

TAYplan, page 8, advocates that developing land within principal settlements (brownfield or greenfield that is not protected for heritage, environmental or recreation purposes) is preferable to developing land outside of them even where this is brownfield.

At page 9 TAYplan seeks to focus new development towards the region’s principal settlements, Tier 1, which includes Almondbank. It goes on to confirm that land release should be prioritised towards principal settlements first, then land on the edge of principal settlements then finally other settlements may be considered.

TAYplan page 18 directs new strategic scale waste/resource management infrastructure to be within or close to the Dundee and Perth Core Areas reflecting the proximity of materials and customers for heat and other products. This site would provide an ideal opportunity for some of the more sensitive waste/resource management processes and would be close to materials and customers associated with the existing settlements and proposed development to the west of Perth.

TAYplan goes on to state that because modern waste/resource management infrastructure is designed and regulated to high standards and is similar to other industrial processes, subject to detailed site specific considerations, waste management facilities can be considered as appropriate land uses within industrial and employment sites.

Policy 6 states that local development plans should identify areas that are suitable for different forms of renewable heat and electricity infrastructure and for waste/resource management infrastructure or criteria to support this; including, where appropriate, land for process industries (e.g. the co-location/proximity of surplus heat producers with heat users).

### **Perth and Kinross Council – Proposed Plan**

The Economic Development strategy states that Perth and Kinross Council will take a flexible approach to ensure that changing circumstances are accommodated to allow for new economic opportunities. This strategy confirms that businesses within the region are the key driver of sustainable economic growth and that maintaining and improving competitiveness is vital to the local economy.

Policy ER1 contains guidance about Renewable and Low Carbon Energy Generation. This policy states that proposals for the utilisation, distribution and development of renewable and low carbon sources of energy will be supported where they are well related to the resources that are needed for their operation.

Policy EP11 provides advice about air quality management that will be considered as part of any forthcoming scheme. It is also noted that this site would be outside the designated air quality area.

Policy EP9B sets out criteria for new waste management infrastructure. Paragraph 4.3.21 goes on to states that this plan does not seek locations or areas of search for waste facilities due to current uncertainty about future requirements, technologies, the scale of new facilities required and the potential for inter-authority working.

The concept of '*Cromwell Environmental Enterprise Park*' is based around the idea of creating a unique employment site that is capable of attracting companies from the renewable energy and green technologies sector. Some forms of waste management may be appropriate in this location and will be considered in further detail when Supplementary Guidance on this matter is brought forward.

### **Other Material Considerations**

#### *Climate Change (Scotland) Act 2009*

On the 4<sup>th</sup> August 2009 the Scottish Climate Change Bill was granted Royal Assent making the Bill an Act of Parliament. The Act is a key commitment of

the Scottish Government and established the initial framework towards reducing greenhouse gas emissions in Scotland and the transition to a low carbon economy on a legislative basis.

#### *Renewables Action Plan (June 2009)*

The Scottish Government's Renewable Action Plan was published in July 2009 and outlines the collective actions which can make Scotland a European leader in renewable energy. The Action Plan sets out route maps for the various technologies.

#### *Draft Electricity Generation Policy Statement 2012 (Replacing 2010 Draft)*

The draft Electricity Generation Policy Statement (EGPS) is out for consultation at the time of writing these representations. This document reinforces the Scottish Government's commitment to renewable electricity and is built around a sustainable, low carbon vision of Scotland's energy future. It also reinforces the need for a rapid expansion of renewable electricity across Scotland

This document confirms that renewable energy facilities across Scotland have the potential to deliver up to £46bn of investment and the outputs from this could be more than enough to meet domestic demand for electricity. The remainder could be exported to the rest of the UK and continental Europe to assist other countries in meeting their binding renewable electricity targets.

This document confirms that with the right type of investment Scotland will enjoy major economic benefits and competitive advantage by successfully developing new low carbon energy resources. Over the decade to 2020, renewables alone could provide up to 40,000 jobs and £30bn investment to the Scottish economy.

### **Conclusion**

Modifications should be made to the boundary of E6 Cromwell Park as shown on the attached plan. The entire 2ha site should be specifically referred to within the plan as a site for energy generating facilities and companies from the green technology sector. We would suggest that this site should be renamed '**Cromwell Environmental Enterprise Park**'.

The site has significant potential for renewable energy generation, waste resource management infrastructure and companies from the green technology sector. The site is currently zoned for employment purposes and has a history of industrial use. It is also located within a tier 1 settlement alongside a major expansion area and has good natural screening and excellent transport links.

The proposal would be in line with Scottish Government renewable energy objectives, it is capable of contributing towards sustainable economic growth

and is fully deliverable. This development would also create new jobs and opportunities for businesses looking to establish and grow within Perthshire.

Any scheme brought forward in this location will be able to benefit from a much higher density due to the physically self-contained nature of the site and the considerable natural screening that exists. The site benefits from clearly defined boundaries with strong water and landscape features that would provide for a meaningful backdrop for any redevelopment proposal.

Further details about the scale and nature of this proposal will be discussed with Perth and Kinross Council when Supplementary Guidance is published on this matter (*Renewable and Low Carbon Energy Generation, Climate Change, Carbon Reduction and Sustainable Construction*).

At the time of writing this report, one of the end users that is interested in this site is looking to bring forward a timber resource recovery centre that produces renewable energy (biomass to produce electricity). The principle of this development has been approved by SEPA and initial discussions have taken place with Perth and Kinross Council. This scheme would be CO<sub>2</sub> neutral and could also provide electricity and heat to surrounding properties. This would have the potential to attract a variety of end users and would act as a catalyst for regeneration across the wider area.

The site clearly has significant potential for redevelopment and should be shown within this Local Development Plan as site for renewable energy facilities and companies within the green technologies sector.

END

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

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

Policy ref.	NES5 Greenbelt	or			
Site ref.		or			
Chapter	3	Page no.	44-45	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 Proposed Plan should identify Kinfauns Castle Gardens as a building group/settlement with a boundary. The settlement of Kinfauns Castle Gardens should not be included within the area designated for greenbelt. A plan has been enclosed to illustrate the boundary that should be added to resolve this objection.

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

Please see representations attached

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## **Representations to the Perth and Kinross Local Development Plan – Proposed Plan**

### **Section 1**

David Horsfall  
South Lodge, Glendelvine, PH1 4JN

### **Section 2**

Representations to the PKC Proposed Plan

### **Section 3**

Policy Reference: NES5 Greenbelt  
Site reference: Boundary of Kinfauns Castle Gardens  
Chapter : 3 Natural Environment  
Page No: 44-45  
Paragraph:

### **Section 4**

#### **Changes that should be made to the plan**

The Proposed Plan should identify Kinfauns Castle Gardens as a building group/settlement with a boundary.

The settlement of Kinfauns Castle Gardens should not be included within the area designated for greenbelt.

A plan has been enclosed to illustrate the boundary that should be added to resolve this objection.

#### **Reasons for requesting changes**

Policy NES5 states that the green belt will be used to sustain the rural economy, increased recreational usage, enhance the landscape, Improved path networks, providing links to the wider countryside and provide links to relevant Green networks within settlements.

Greenbelt is land designated for the purpose of managing the growth of a town or city in the long term. The key objectives of greenbelt policy are:

- to direct planned growth to the most appropriate locations and support regeneration;
- to protect and enhance the character, landscape setting and identity of towns and cities; and

- to protect and give access to open space within and round towns and cities. It is unclear how the allocation of Kinfauns Castle Gardens within the Perth Area Greenbelt contributes to these objectives.

Greenbelt designation should be used to direct development to sustainable locations, not prevent development from happening. The inclusion of Kinfauns Castle Gardens within the greenbelt would frustrate the delivery of otherwise acceptable development within an established building group and stifle small scale infill development that would contribute to the sustainability of this settlement. Small settlements such as Kinfauns Castle Gardens play an important role within the housing market, providing a range and choice of housing in locations that people want to live.

SPP paragraph 106 states that land should only be designated for green belt where it will contribute to the settlement strategy for the area. The inclusion of this settlement within the greenbelt does not meet the objectives of this strategy as this is an existing settlement in a sustainable location alongside the settlement of Perth. There is also very limited capacity for further growth so any new development would not be in competition with the strategic development areas.

Further more, green belt is not necessary where other policies or designations provide an appropriate context for decision making. The Perth Area Local Plan (1995) currently shows this settlement is within an Area of Great Landscape Value (AGLV) and also within the Kinfauns Castle Historic Garden which already provides an appropriate framework for decisions.

This objection would be withdrawn if Kinfauns Castle Gardens is shown within its own settlement boundary as shown on the attached plan.

## 68 Proposed Plan

5.1.4 An objective of Green Belt policy will be to strictly control the spread of built development,

increase the area's use for leisure and recreational purposes, particularly for managed public

access, and facilitate the creation of green corridors with improved biodiversity.

5.1.5 National policy and guidance attaches great importance to the need to establish confidence in the

permanence of Green Belts. The boundaries which define the area must be clear and generally

follow permanent physical features. To create permanence, the Green Belt must allow sufficient

land for long-term expansion, possibly in excess of 30 years. The Green Belt is therefore as

much about defining the long-term expansion of Perth and surrounding villages, as protecting its

landscape setting. The proposed area generally follows the smaller area suggested by the Perth

Green Belt Study prepared by David Tyldesley and Associates in June of 2000. The outer

boundary identified follows roads, the River Earn and a small section of the Aberdeen to Glasgow railway. The inner boundaries are more complex since they define the limits of urban development in Perth and the surrounding villages. Areas such as those to the east of lie outside the Green Belt as they are felt to have long-term

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10<sup>th</sup> April 2012

# **Land at Glasgow Road, Broxden, Perth**

## **Representations to Perth and Kinross Council Local Development Plan - Proposed Plan**

**Prepared for:**

John Dewar Lamberkin Trust and Needhill LLP

**Prepared by:**

Savills  
163 West George Street  
Glasgow  
G2 2 JJ

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# 1. Introduction

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- 1.1 This report details the representations to the Perth and Kinross Local Development Plan Proposed Plan on behalf of our client, John Dewar Lamberkin Trust and Needhill LLP, in relation to their land holding at Glasgow Road, Broxden, Perth.
- 1.2 Our client is committed to participating in the Local Development Plan process and has made representations in respect of land at Glasgow Road, Broxden at the Call for Sites and the Main Issues Report stages.
- 1.3 An application for planning permission in principle is currently being prepared for a mixed use development comprising residential and employment uses, landscaping and associated infrastructure at this site. A proposal of application notice was submitted to Perth and Kinross Council on 15 July 2011. Appendix 1 of this report contains the proposal of application notice location plan.

## 2. Representations to Proposed Plan

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2.1 We support the identification of the land at Broxden in the Proposed Local Development Plan for employment use and mixed use (employment and housing including indicative landscaping).

2.2 Notwithstanding this, we request changes to be made to the following site allocations, as set out below:

- Mixed Use Site Reference MU1;
- Employment Site E2

### **Mixed Use Site Reference MU1**

2.3 Part of our client's site is covered by Mixed Use Site Reference MU1 to which policy ED1B applies.

2.4 It is requested that the boundary of the Mixed Use Site MU1 is amended. The area to the north east of the MU1 site is outwith our client's control and we request that this area forms a separate mixed use site allocation.

2.5 The proposal of application notice location plan submitted on behalf of our client for the proposed application for planning permission in principle is shown in Appendix 1. We request that the boundary for the Mixed Use Site MU1 is amended as shown on the plan in Figure 2 at the end of this section. Our client's site is an effective site under the terms of paragraph 55 of the Planning Advice Note 2/2010. The site is within the ownership of parties that are willing for it to be released for development. The physical elements of the site including matters such as topography, access, flood risk, ground conditions have been considered in detail during the preparation of the application for planning permission in principle.

2.6 The area to the north east of the MU1 allocation is outwith our client's landownership. It is not within our client's control to bring forward a masterplan for the whole MU1 site as currently shown in the Proposed Plan.

2.7 It is considered that the remainder of the MU1 site which is outwith our client's control could come forward under a separate mixed use site allocation.

2.8 It is intended that the proposed development of our client's site will be delivered through a masterplan approach and the residential and employment uses proposed will be set within high quality landscaping.

2.9 On page 79 of the Proposed LDP, the following uses are indicated for the MU1 site: 200 residential units, 4.5 hectares of general employment land and 2.4 hectares of mixed use development. The Perth Settlement Map also shows an area of indicative landscaping within the site.

- 2.10 The Proposed MU1 allocation refers to 200 residential units over the whole of the MU1 site. The topography and physical aspects of our client's site have been examined and it is considered that around 200 housing units could be accommodated within the boundary of our client's site.
- 2.11 The Proposed MU1 allocation on page 79 of the Proposed Plan indicates that 9.6ha of residential land and 4.5 ha of employment land should be provided within the MU1 site. The allocation also requests the inclusion of SUDs ponds, open space, landscaping and a network of paths. From our detailed review of our client's site it is considered that it is not possible to accommodate all these requirements, while also providing the specified areas of land for residential and employment use. We therefore request that the area indicated for employment land is reduced from 4.5 ha to 2 ha. We also request that the area of land for residential use is reduced to 7.4 ha. We consider around 200 residential units could be provided within our client's site while allowing for appropriate landscaping and open space and SUDs provision.
- 2.12 It is requested that the revised MU1 allocation allows for 200 houses. Figure 2 at the end of this section shows the proposed revised boundary for the MU1 allocation.
- 2.13 In relation to the site specific developer requirements on page 79 of the LDP, we support the requirement for cycle paths, core paths and rights of way to be incorporated into the masterplan. Amending the boundary of the mixed use allocation would allow us to fully plan the paths and access points for this site and ensure that the paths within the site link to the wider core path network. It is intended that the application for planning permission in principle will allow for the creation of the SUDs ponds that will help to enhance the biodiversity and habitats on the site. An ecology assessment has been undertaken as part of the preparation of the application for planning permission and accompanying Environmental Impact Assessment.
- 2.14 We agree within the requirement for a Flood Risk Assessment. A full Flood Risk Assessment will be submitted with the application for planning permission in principle.
- 2.15 We also request that the boundary of the MU1 site is slightly extended at the south west corner of the site to incorporate the area to the south of the park and ride, which is currently shown as open space in the Perth Settlement Map. It is requested that this extended area is shown as indicative landscaping in the Perth Settlement Map. This area is currently proposed to be included in the application for planning permission in principle for the site.

#### **Allocation E2: Broxden**

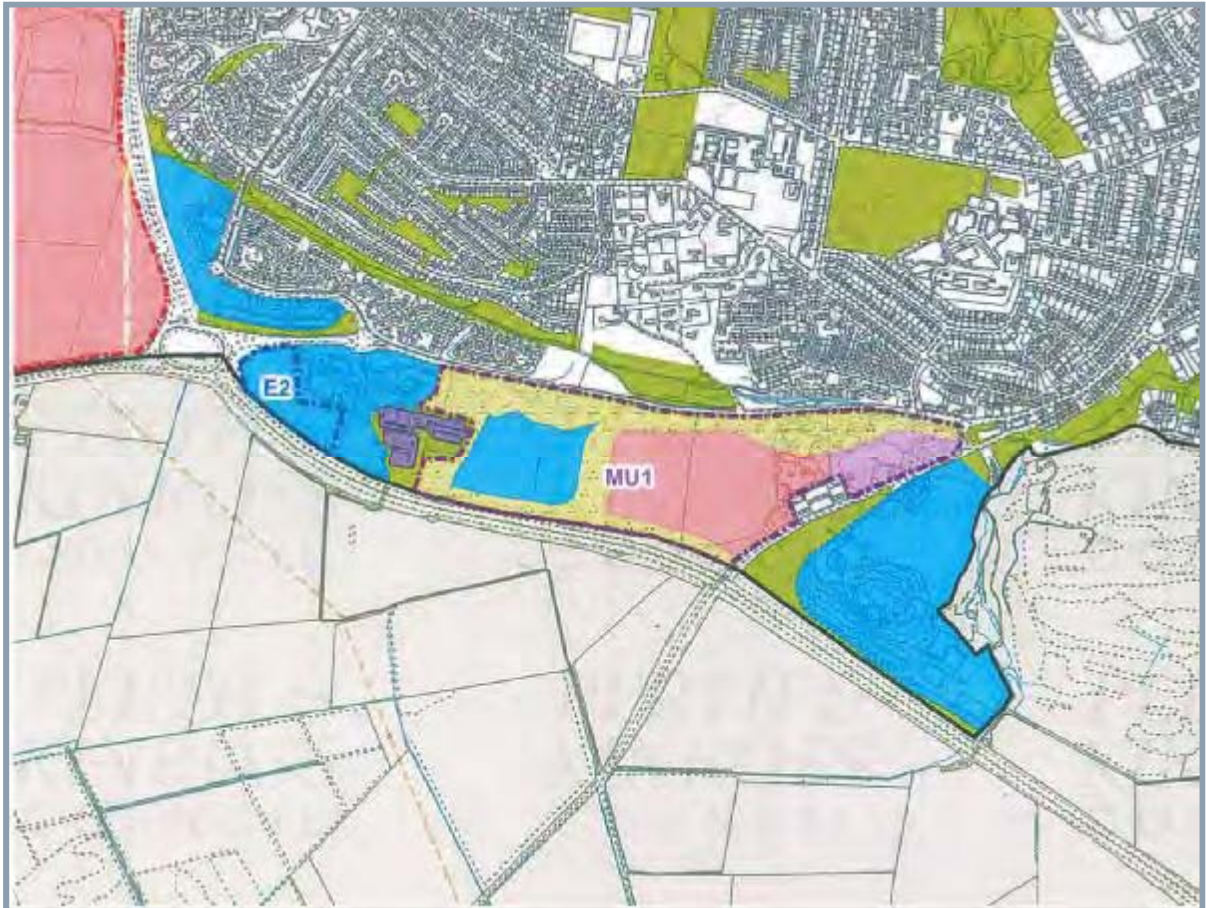
- 2.16 We request that the E2 allocation is extended to the east to ensure that this allocation directly joins the revised MU1 allocation. The area of land to be included within this extended area is currently shown in the Perth Settlement Map as Employment Existing. This area was the site of the Broxden farmhouse which has been demolished. It is currently vacant land and for consistency should be included in the same E2 site on the Perth Settlement Map.
- 2.17 The employment E2 allocation on page 79 of the Proposed Plan identifies that area as capable of accommodating 4.5 ha of employment land. We have calculated that the total gross area within the proposed extended E2 site is 3.8 ha. We request that the allocation E2 area is shown as 2.5 hectares to allow the employment land to be provided within a high quality landscaped setting and for the provision of SUDs ponds.



### Proposed Amendments to Proposed Plan Perth Settlement Map

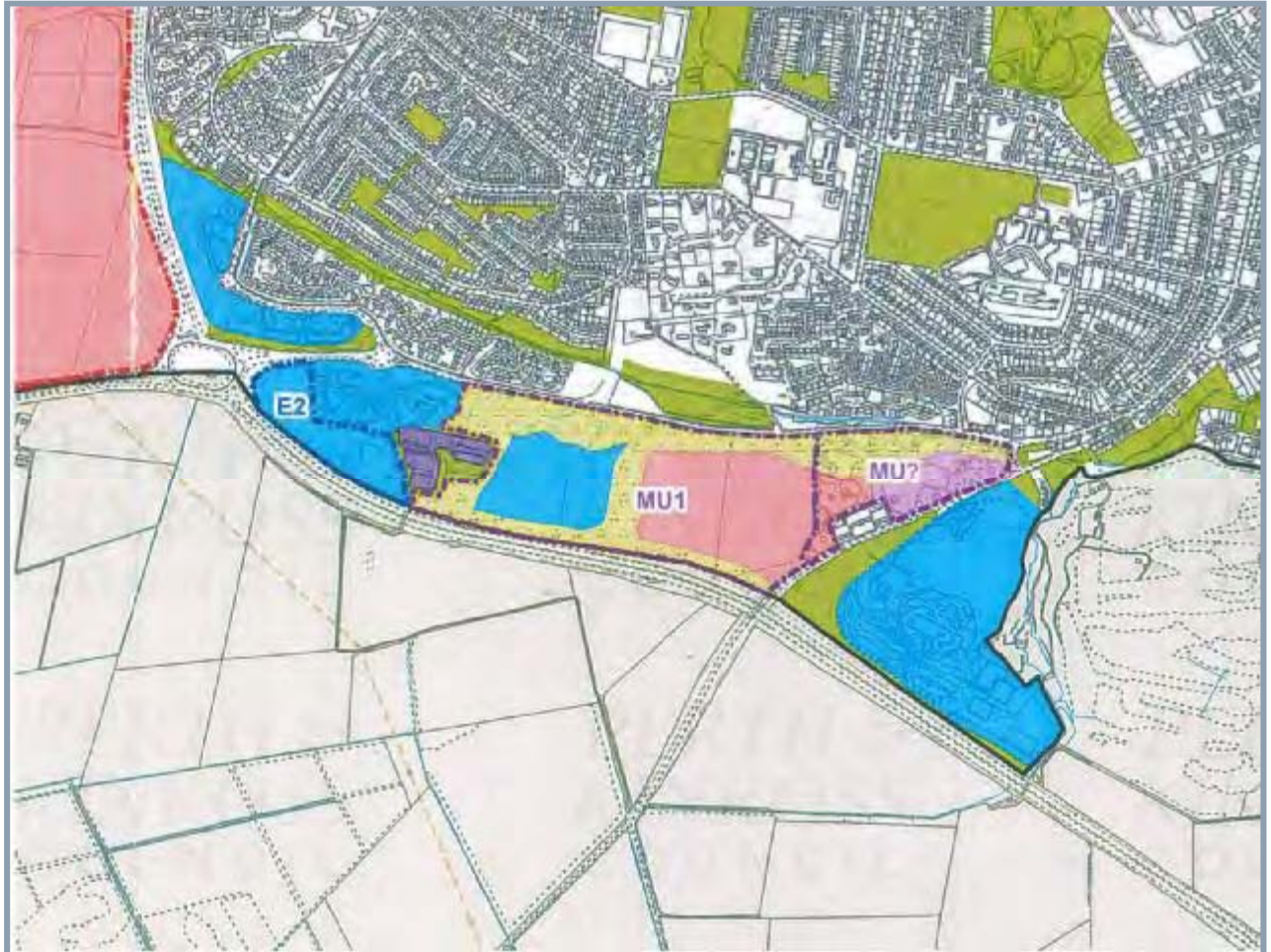
2.18 The figure below show the section of the existing Perth Settlement Map.

Figure 1: Proposed Plan Perth Settlement Map



- 2.19 The figure below shows the requested amendments to be made to the E2 and MU1 allocations and the separate allocation of the land to the north east of current MU1 allocation.

Figure 2: Proposed Changes to Perth Settlement Map



### 3. Conclusions

---

- 3.1 We request that the site allocations Mixed Use Site Reference MU1 and Employment Site E2 are amended to accord with the proposals detailed in Section 2 of this report.
- 3.2 We trust that the contents of this report will be taken into consideration in the preparation of the Local Development Plan.
- 3.3 Should you have any queries or require any additional information, please contact Iain Pattenden on [REDACTED]

## Appendix 1 – Proposal of Application Notice Location Plan

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



Perth 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](mailto: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 10<sup>th</sup> 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	Mr Mike Henderson
Address and Postcode	c/o Savills, 163 West George Street, Glasgow
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.	Camserney	or
Chapter	<input type="text"/>	Page no. <input type="text" value="175"/> 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.

I am writing on behalf of my client Mike Henderson of Carse Farm in Aberfeldy. Previous representations were submitted to the Main Issues Report for land within his ownership at Camserney. These have not been considered appropriate for development in the Proposed Plan. We ask that these are reconsidered at this stage for inclusion in the plan as appropriate locations for residential development.

In addition we ask that the settlement boundary for Camserney is extended to reflect the pattern of existing houses within the settlement particularly in the east of the settlement.

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

This rural area of Perthshire requires increased investment to ensure the viability of rural settlements. As identified in our representation to the Main Issues Report we believe that my clients land could provide a suitable level of residential development appropriate to the rural area.

For your information, please find location plans attached to this email showing the location of the sites that are being promoted.

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

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

Save a copy

Print

Submit

Figure 1

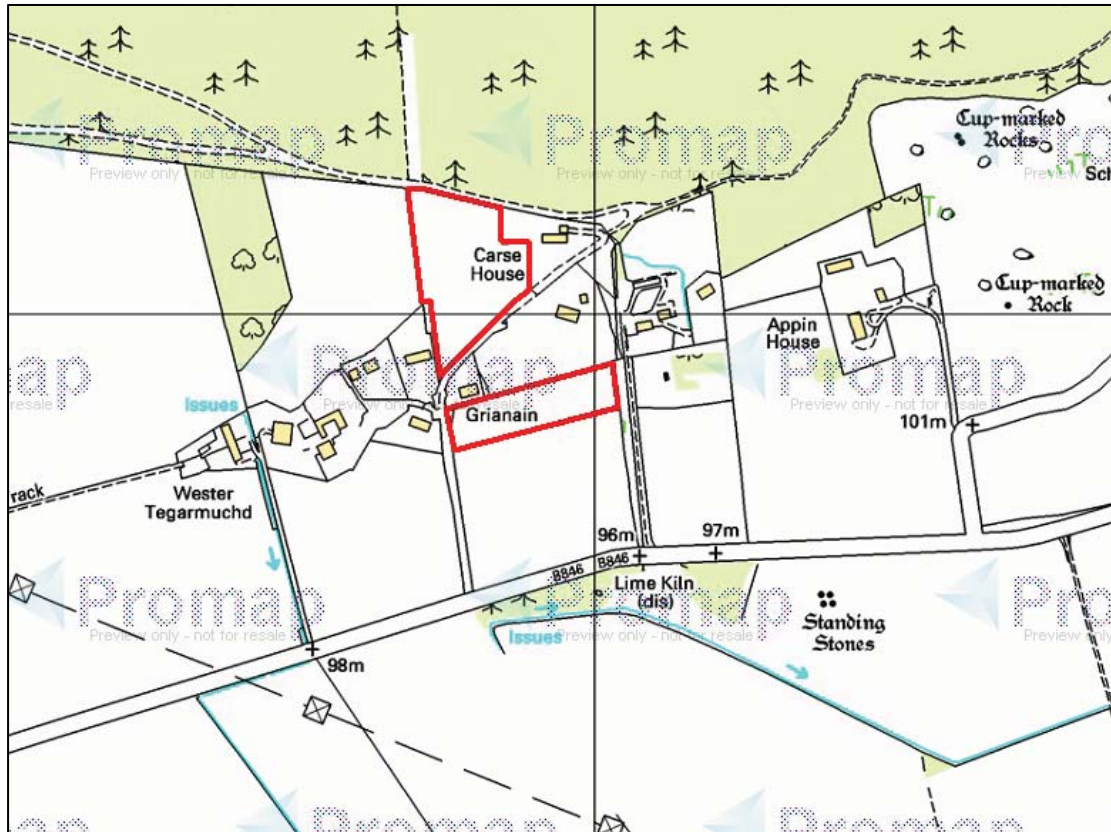
**Land east of Tegarmuchd – Potential Development Site**

Figure 3

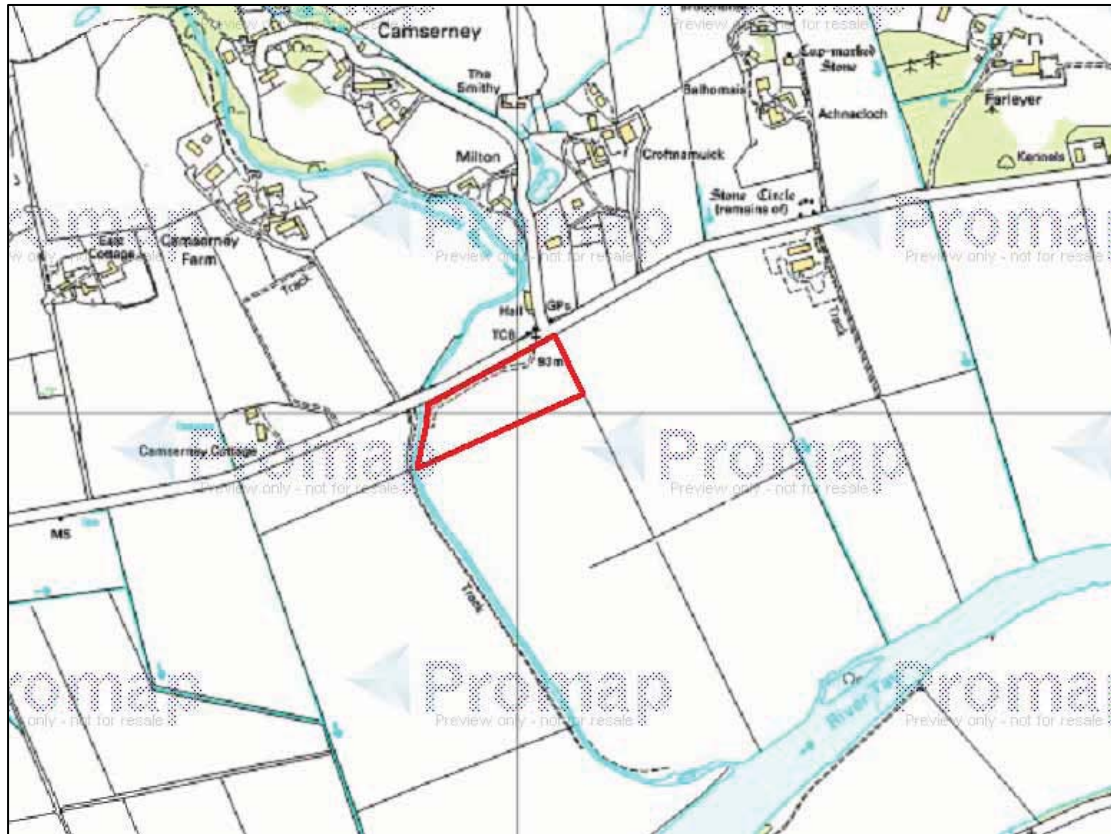
**Land south of Camserney – Potential Development Site**



Figure 2

## Land west of Carse Farm – Potential Development Site



Figure 1

Land at Camserney for extension of the settlement boundary



Figure 5  
Land at Keltneyburn



April 2012

# Proposed Plan Representations

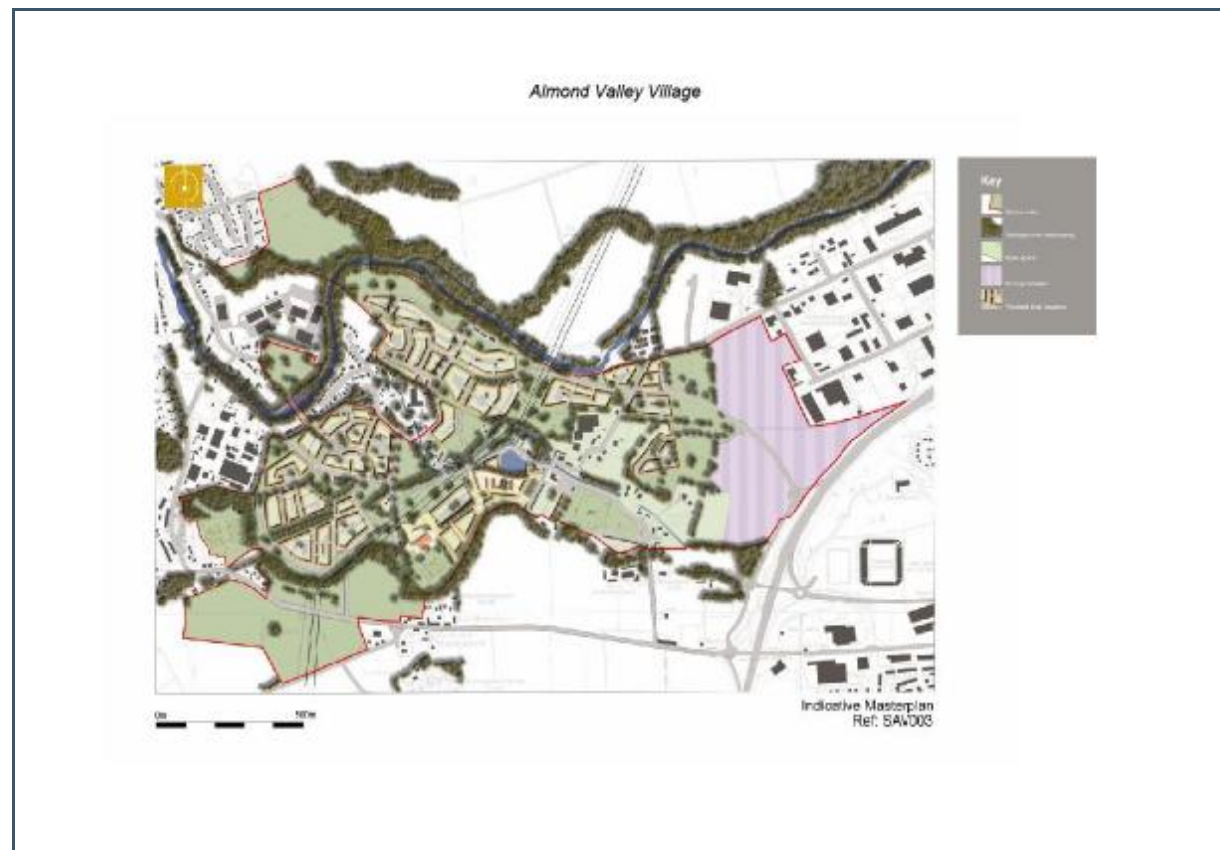
## Almond Valley

Prepared for:

The Pilkington Trust

Prepared by:

Savills Planning  
163 West George Street  
GLASGOW  
G2 2JJ



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# 1. Executive Summary

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- 1.1 These representations are made on behalf of The Pilkington Trust. The Pilkington Trust owns the land on which the strategic development, known as Almond Valley, is proposed. The principle purpose of these representations is to seek the reinstatement of Almond Valley within the Local Development Plan as recommended in the Report by the Executive Director (Environment) to Perth and Kinross Council ("the Council") dated 10<sup>th</sup> January 2012 ("the Proposed Plan Committee Report" - Appendix 1) as the preferred short term location for such strategic growth to take place.
- 1.2 Almond Valley is identified in the adopted Perth Area Local Plan 1995 as Opportunity Site H24, the preferred location for 1,000 new homes. In 2008, following pre-application discussions with officers of the Council and other stakeholders, a planning application was submitted (Ref. 08/00678/IPM) for a residential-led development of up to 1,800 homes.
- 1.3 This application was recommended for approval at the Development Control Committee meeting on 7<sup>th</sup> December 2011 (see Development Management Committee report ("the Planning Application Committee Report" – Appendix 2). This recommendation recognised the deliverability of the Almond Valley development proposal, as well as the ability, for the proposal to be implemented within the life of the planning permission. At the committee meeting, however, Councillors voted to refuse the application contrary to the officer's recommendation.
- 1.4 A decision notice was issued by Perth and Kinross Council on 4<sup>th</sup> January 2012. Only two reasons for refusal were offered:
  1. The proposed development is contrary to Policy 1 of the Perth Area Local Plan 1995 (incorporating Alteration No. 1 Housing Land 2000) as the proposed site is materially different to that zoned as Opportunity Site H24 in the Local Plan
  2. The proposed development is contrary to Policy 2 of the Perth Area Local Plan 1995 (incorporating Alteration No. 1 Housing Land 2000) as the proposed site is adjoining Almondbank (Inset Map 2).
- 1.5 Neither of these reasons refutes the deliverability of the scheme nor the strategic appropriateness of the location. They are objections relating only to the location of the outer boundary of the proposal site.
- 1.6 An appeal against this decision was submitted to the DPEA (Ref. PPA-340-2065) on 9<sup>th</sup> February 2012. A decision is anticipated on this shortly. Given the reasons for refusal, we are confident that conditions can be added to a planning decision notice which will adequately address these reasons for refusal and allow the development to proceed. If the appeal is allowed and planning permission granted then Almond Valley would satisfy the aims and objectives of both the current and emerging local development plan in allocating a strategic housing site to the west of Perth.
- 1.7 Notwithstanding the appeal process, the Pilkington Trust submits the proposal remains the only viable strategic housing site within the Perth Core Area which will enable the Council to provide an effective five year housing supply and achieve a predictable outcome within the plan period (as required in paragraph 17 of Scottish Planning Policy, "SPP").

- 1.8 As a result, Almond Valley should, regardless of the appeal process, be reinstated in the Proposed Plan as the preferred and deliverable strategic housing option. As presently drafted and without the reinstatement of Almond Valley, it is our view that the Proposed Plan will be unreliable in guiding the future development and use of land in the Perth Core Area.
- 1.9 There are two locations currently identified in the relevant section of the Proposed Plan (the “Proposed Plan” – Appendix 3), Perth West (H70) and Bertha Park (H7). For the reasons detailed below, it is submitted that these two sites are fundamentally flawed as strategic housing sites in the short term (i.e. within five years). Both sites rely on the prior delivery of substantial infrastructure which cannot be delivered in a reasonable timescale. If adopted, as the preferred strategic housing sites, the Council would not be able to satisfy its statutory requirement to provide an adequate five year housing land supply at all times (SPP, paragraph 75).
- 1.10 The Council has already acknowledged the inherent challenges presented by these sites in the short term by changing the description of the significant housing developments for the Perth Core Area in the Proposed Plan to ‘Long Term Strategic Development Areas’ (paragraph 5.2.6, Proposed Plan, page 77 - Appendix 3) from ‘Strategic Development Areas’ (Draft Proposed Plan as presented to committee (the “Draft Proposed Plan”, page 81 – Appendix 4).
- 1.11 TAYPlan identifies an annual requirement for approximately 510 new homes in the Perth Core Area over the plan period (Proposed Plan, page 69). Only Almond Valley can make a meaningful contribution to this requirement.
- 1.12 To not include Almond Valley, which is the only strategic housing site which is deliverable in the short term, in addition or in the alternative to the two locations offered within the consultation draft Proposed Plan, will severely prejudice the Council’s ability to deliver the Scottish Government’s over-arching aim of achieving sustainable economic growth. It would hinder the Council’s ability to deliver sufficient new homes and attract new investment and jobs to the area over the plan period and risk forgoing the significant benefits of early development taking place at Almond Valley including:
- Housing to provide the identified 5 year land supply
  - Private sector funded delivery of the already designed upgraded A85/A9 road junction
  - Additional, accessible employment land adjacent to the existing Inveralmond Industrial Estate
  - Private sector funded two stream primary school
  - Access for the future development of Bertha Park.

## 2. Local Development Plan Context

---

- 2.1 In the Proposed Plan Committee Report and Draft Proposed Plan, Almond Valley is identified as the preferred short term strategic housing site for 1500-1700 houses, with 1,000 identified for delivery up to 2024 and a further 500-700 being delivered thereafter. The Draft Proposed Plan (Appendix 4, page 82) confirms the status of Almond Valley:

*'A current planning application exists for the site which contains much of the detail requirements for the development.'*

- 2.2 In respect of Bertha Park (H7) the Draft Proposed Plan (Appendix 4, page 81) states:

*'A long term housing and employment land proposal which is only likely to deliver limited development (200 houses) during this plan period but will provide a long term supply extending beyond 2040.'*

- 2.3 On Perth West the Proposed Plan Committee Report (paragraph 58, p.16) states:

*'A major development at Perth West was the Council's preferred option for a major growth area. Following the publication of the Main Issues Report traffic modelling work was done at the request of Transport Scotland. Various options for assessing the site were considered including a grade separated junction at Broxden. All options investigated had an adverse impact on the truck road network, and would be likely to attract objections from Transport Scotland. Accordingly this option has not been carried forward to the Proposed Plan...'*

- 3.1 The Planning Application Committee Report (paragraphs 155 & 156, pages 52-53) sets out that Almond Valley is:

*'A longstanding, committed residential development site... and the proposed development at the zoned Almond Valley site is therefore considered to accord with the development plan, will lead to the creation of jobs, enhanced community and educational facilities and homes, which will significantly assist in meeting local and national targets in a sustainable and measured fashion.'*

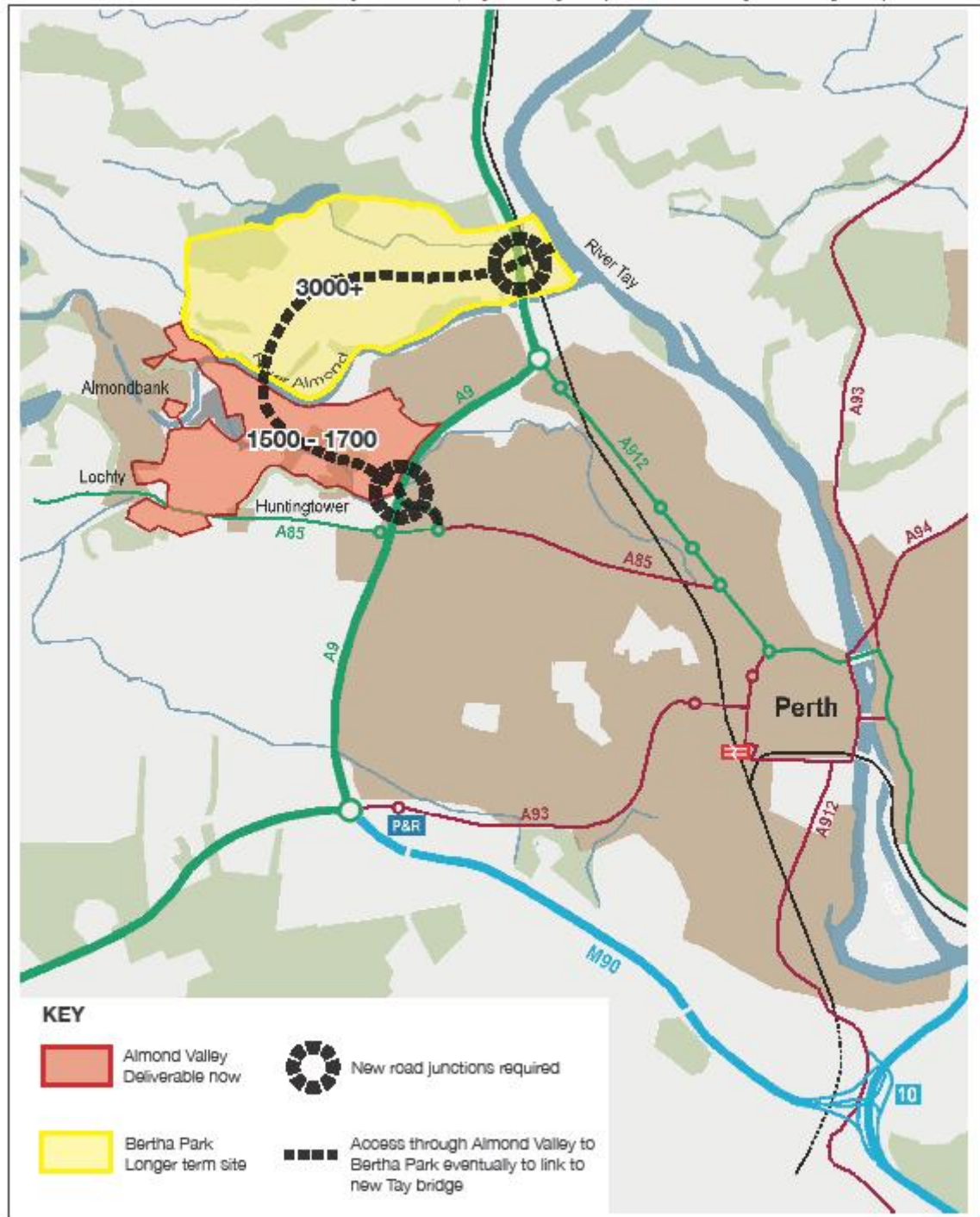
- 2.4 TAYPlan identifies an annual requirement for 510 new homes in the Perth Core Area over the plan period (Proposed Plan, page 69). The Draft Proposed Plan sets out a logical and considered means for Perth to grow over the next 30-40 years and beyond, through identifying Almond Valley as the first in a chain of development running around the west and north of Perth and beyond, over the proposed new Tay crossing into Scone.

- 2.5 This approach has been thoroughly assessed by the Council's own professional officers and is considered the best means by which to deliver the levels of housing which will be needed over the short, medium and long term to engender sustainable economic growth of the city for the benefit of all existing and future residents. This strategy is illustrated in Figure 1, below.



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Data:URBANDSIGNPROJECTS:01-SCOTLANDPROJECTS:GLPL136874-PilkingtonTrust-AlmondValleyVillage,Perth:DrawingsPlans\_April\_2012:GLPL243009\_001\_Figure1\_Draft\_Strategic\_Development\_Areas:10/04/12



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project	Almond Valley: Representations to Proposed Plan
client	Condrie
date	10/04/2012
drawn by	JR

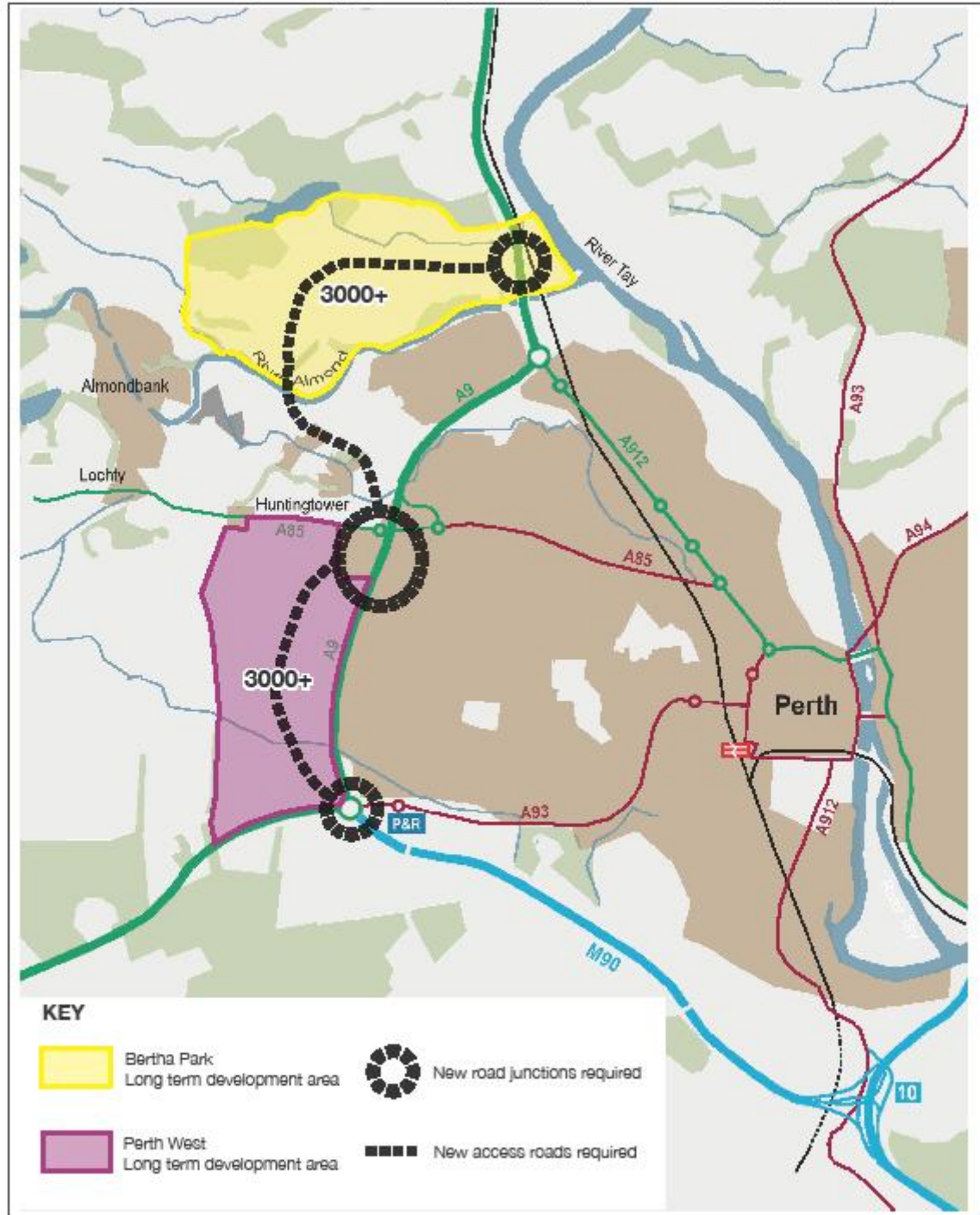
drawing	Figure 1 - Draft Proposed Plan Strategic Development Areas GLPL243009
job no.	001
drawing no.	001
rev	-
scale	1:10000



- 2.6 The Proposed Plan physically effectively separates the current 'Long Term Strategic Development Areas' thereby requiring three major new road junctions instead of two (see Figure 2, below). In the Council's own officers opinion, the preferred strategic housing areas should be firstly Almond Valley which then opens up the required access into the longer term strategic housing site at Berth Park. This strategy only requires one initial major new road junction at the A85/A9 intersection which is already designed and ready to be delivered (see Figure 1 above).
- 2.7 The Proposed Plan position is unsustainable as it still requires the upgraded A85/A9 road junction to provide access into the remaining industrial land at Almond Valley (site E38 Ruthvenfield Road) and on into Bertha Park whilst also requiring additional new, unnecessary and unviable road infrastructure improvements to the Broxden junction on the A9.
- 2.8 To add a requirement for a third new road junction to the Proposed Plan at an estimated additional cost of £25 million to facilitate the delivery of new housing makes no sense either in environmental, or financial terms and is contrary the long established and considered professional judgement of the Council's own planning officers.
- 2.9 This additional cost will place severe constraints on the deliverability of Perth West and will have a knock on effect on the short term deliverability of Bertha Park. The viability of both the Council's currently identified 'Long Term Strategic Development Areas' is highly questionable given this additional £25 million infrastructure cost over and above that needed for the considered approach to the strategic growth of Perth set out in the Draft Proposed Plan.
- 2.10 Clearly the Proposed Plan as currently formed does not provide the opportunity for the Council to deliver an effective five year housing land supply and must be amended to include Almond Valley. Almond Valley is ready to be delivered and will not require years of further investigation and assessment and uncertain infrastructure costs to allow the much needed new housing in the Perth Core Area to be built.

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Data: URBANDESIGNPROJECTS:01-SCOTLANDPROJECTS:GLPL136874-PillingtonTrust:AlmondValleyVillage,PerthDrawingsPlans\_April\_2012GLPL243009\_002\_Figure2\_Long\_Term\_Strategic\_Development\_Areas.10/04/12.



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project	Almond Valley: Representations to Proposed Plan	drawing	Figure 2 - Unco-ordinated Long Term Strategic Development Areas
client	Condrie	job no.	GLPL243009
date	10/04/2012	drawing no.	002
drawn by	JR	rev	-

scale



savills

### 3. Almond Valley

- 3.2 A planning application for Almond Valley was submitted to the Council on 28 March 2008 and was registered on 31 March 2008. This was accompanied by an Environmental Statement, a Planning and Design Statement, a Breeding Bird Survey and a detailed Flood Risk Assessment.
- 3.3 In tandem with the investigations carried out in relation to the planning application, the Council commissioned Halcrow Consultants to prepare an assessment of the means by which to deliver the required roads infrastructure to facilitate the delivery of Almond Valley and neighbouring proposed developments at Newton Farm and the former Perth Auctionmart site. This study, known as the Perth Western Expansion Study was published on 29 May 2009 and was approved at the Council Enterprise and Infrastructure Committee on 26 August 2009. The Council identified Almond Valley as the only viable major strategic housing site in this study.
- 3.4 Subsequent to this, the Council prepared and submitted a detailed application on 14<sup>th</sup> September 2011 (Application Ref. 11/01579/FLL) for the required road infrastructure improvements to facilitate a new junction at the A85/A9 interchange to allow access into Almond Valley with the potential for future linkages to open up the Bertha Park site as a long term development site after Almond Valley. To date the Council has invested at least £173,945.69 of its own funds to prepare and submit the planning application for the new A85/A9 junction.
- 3.5 The Draft Proposed Plan confirms the sequential approach taken by the Council's own officers and professional advisors (Appendix 4, pages 81 and 82) with its description of Bertha Park as a 'long term housing and employment land proposal' with the description of the Almond Valley stating that it already contains 'much of the detail of the requirements for the development.'
- 3.6 Of particular relevance to the effectiveness of housing sites is Planning Advice Note 2/2010 (August 2010). Paragraph 55 of this document sets out seven criteria for the assessment of the effectiveness of housing sites. These are:
- **ownership:** *the site is in the ownership or control of a party which can be expected to develop it or to release it for development*
  - **physical:** *the site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply*
  - **contamination:** *previous use has not resulted in contamination of the site or, if it has commitments have been made which would allow it to be developed to provide marketable housing*
  - **deficit funding:** *any public funding required to make residential development economically viable is committed by the public bodies concerned*
  - **infrastructure:** *the site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development*



- **land use:** housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option

3.7 We have assessed Almond Valley against all of the above criteria and conclude that the site should be considered as an effective housing site. We comment on the specific criteria below.

### Ownership

- 3.8 The site has been owned by the Pilkington Trust since 1974. As a result of this long-standing ownership, the site has the advantage of being less impacted by current land values. This enables the site to be delivered in a shorter period of time. The Almond Valley site includes the entirety of the Pilkington Trust ownership which will allow vacant possession of the land to be obtained via an incontestable notice to quit (section 22 (2)(b) of the 1991 Agricultural Holdings (Scotland ) Act 1991) once planning permission in principle is obtained.
- 3.9 There is agreement between the other key landowners in the area, Bob Reid and St Johnstone Football Club to work together to deliver the required infrastructure to facilitate the development of Almond Valley and other surrounding key land allocations for employment and retail use. There are no other significant land ownership issues that will prevent the implementation of the Almond Valley proposal.

### Physical

- 3.10 Almond Valley benefits from an allocation in the adopted Local Plan and is currently the Council's preferred strategic residential development site. Given this, the Pilkington Trust financed the preparation and submission of an application for planning permission in principle which, as stated above, is currently subject to an appeal against the Council's refusal of the application in contradiction to its own officers recommendation. A full Environmental Statement was submitted with the planning application which addressed any physical issues associated with the site. In addition, further transportation and flooding work has been undertaken to address any outstanding issues. It has therefore been demonstrated that the site is suitable for residential development and that appropriate mitigation measures can be in place to address any environmental impacts that may arise.

### Contamination

- 3.11 There is no evidence of contamination from the site investigation surveys undertaken at Almond Valley and the site requires no significant remediation works in order to be deliverable.

### Deficit Funding

- 3.12 A considerable contribution from the Pilkington Trust to the A85/A9 junction improvements along with drainage and education infrastructure will be required for the development to proceed. A planning application for the detailed design of the proposed road junction upgrade has been submitted by Perth & Kinross Council (Application Ref. 11/01579/FLL). The reinstatement of Almond Valley in the Proposed Plan along with the other key employment and retail land allocations adjoining the site and the area of the junction upgrade works will allow the cost of the required infrastructure to be borne by the private sector. Any other arrangement of land allocations in this area of Perth are likely to require additional public funding in excess of that already identified.

## Marketability

- 3.13 The Almond Valley proposal can definitely be developed during the plan period. The development of essential education and community facilities in advance of the majority of the residential development coming forward will ensure that Almond Valley has a sense of place from the outset. The phasing of the development will allow for a number of house builders to be involved in the construction of the development at any one time ensuring that a steady sales rate can be maintained from the commencement of development.

## Infrastructure

- 3.14 As stated above, the key road infrastructure has been designed and a planning application has been submitted for this by the Council. Almond Valley will enable the new road junction for the A85/A9 to be delivered along with drainage upgrades, a new two stream primary school and community facilities. The development of Almond Valley will also provide for access to the long term strategic development site of Bertha Park, thereby making that site deliverable.
- 3.15 In any other development scenario, the significant infrastructure needed in this part of Perth will require to be redesigned which will delay the delivery of any strategic housing for a considerable time, if indeed the extra road junction required by the Council's current preferred strategy can ever be funded.

## Land Use

- 3.16 Almond Valley is currently identified in the approved Perth and Kinross Structure Plan 2003 and the adopted Perth Area Local Plan 1995 as a strategic housing site. Almond Valley was the Council's preferred strategic housing land until the Draft Proposed Plan was amended on 10 January 2012.
- 3.17 Given the existing housing allocation at Almond valley, both the Council and the site owners, the Pilkington Trust have invested a considerable amount of time over the last four years to address the constraints to the deliverability of the site in terms of road access and flooding. This work is complete and the development is ready to enter the detailed master planning phase which would allow development to commence within one year from consent being granted for the development.
- 3.18 To not include Almond Valley in the Proposed Plan which is issued to the Scottish Ministers prior to the Examination in Public would be a backward step for the Council. There will be a non-existent five year housing land supply. The development of windfall sites, which will not necessarily provide the required road infrastructure, education facilities or affordable housing may have to be allowed to meet demand. Given the significant housing requirement in the Perth Core Area, Scottish Ministers may also not be able to dismiss such applications should they go to appeal.
- 3.19 If Almond Valley is not permitted to proceed, the time, effort and expense that has been spent both by the Council itself and the landowners of the Almond Valley site in preparing all the necessary assessments and detailed design of the required road infrastructure will be lost. The delivery of the required housing for the Perth Core Area will be set back by several years,

perhaps longer, if the significant additional infrastructure costs associated with the current 'Long Term Strategic Development Areas' can be overcome.

- 3.20 A full feasibility study has been undertaken for Almond Valley, demonstrating that it is a viable scheme. No such analysis has been undertaken by the Council to demonstrate the effectiveness of Perth West or Bertha Park.
- 3.21 Almond Valley can demonstrably be seen to be an effective site as of now. Its viability in both physical and financial terms has been fully assessed. This cannot be said of the current 'Long Term Strategic Development Areas' identified in the Proposed Plan.
- 3.22 The issues associated with the Proposed Plan's current 'Long Term Strategic Development Areas' are dealt with in the following sections.



## 4. Perth West

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- 4.1 The Proposed Plan currently includes an allocation for Perth West for 3,000+ houses. The inclusion of Perth West against the recommendation of officers in the Proposed Plan Committee Report does not allow the Council to provide an effective five year housing land supply solution for the Perth Core Area.
- 4.2 The Proposed Plan (page 78) sets out the requirements for the opportunity at Perth West as follows:
- A masterplan will be required for the comprehensive development of this site setting out the phased release of both housing, community and employment land
  - Flood Risk Assessment
  - Acceptable multiple vehicular access points to the development site providing access to both the trunk road network and central Perth without detriment to the local and strategic road network
  - Facilities to enable expansion area to be connected to Perth's bus network
  - Network of paths and cycle routes providing good active travel links to Perth and Green corridors in particular networks to link the site with Perth and the wider countryside
  - Enhancement of biodiversity
  - Integration of existing landscape framework into the development of the site and in particular the protection of existing woodland and tree belts in the area
  - New Primary School provision and potential for a new Secondary School
  - Investigation of the provision of a district heating system and combined heat and power infrastructure utilising renewable resources.
- 4.3 The Proposed Plan suggests that Perth West could provide 550 homes to 2024 with an additional 2,500 in the period thereafter (page 69).
- 4.4 Perth West faces severe challenges in respect of deliverability. In order to facilitate the required multiple vehicular access points' at least two new junctions on the major trunk road network will be required (see Figure 2 above). In addition to a redesign of the Council's own road junction upgrade of the A85/A9 junction which the Council estimates as an £11M cost a further grade separated junction will be required at the Broxden Junction of the A9. This will add a significant cost in the region of £25M to the project and further delay its deliverability and viability.
- 4.5 As stated in Section 3 above, the Proposed Plan Committee Report (paragraph 58) is clear on the deliverability of Perth West:

*'A major development at Perth West was the Council's preferred option for a major growth area. Following the publication of the Main Issues Report traffic modelling work was done at the request of Transport Scotland. Various options for accessing the site were considered including a grade separated junction at Broxden. All options investigated had an adverse impact on the*

*Trunk Road network, and would be likely to attract objections from Transport Scotland. Accordingly this option has not been carried forward to the Proposed Plan. However, in recognition that further design work may allow these issues to be resolved the area has been excluded from the Green Belt to allow future consideration of this option. Should any of the strategic development sites not come forward within the early part of the Plan period then the potential of this area will be re-evaluated.'*

- 4.6 It is therefore unlikely that Perth West will be able to contribute to the five year housing land supply for the Perth Core Area given the physical and financial challenges in delivering the required road infrastructure.
- 4.7 In addition to the additional road junction improvements, Perth West is also disadvantage in terms of overall access, landscape and visual issues and deliverability. These issues are set out in the following paragraphs.

### **Access and Road Infrastructure**

- 4.7 Savills submitted a transportation report prepared by Colin Buchanan highways consultants in respect of the proposed Perth Core Area strategic development areas at the Main Issues Report stage of the new Perth and Kinross LDP. The conclusions of that report are still relevant for the Proposed Plan consultation and are therefore included in this report.
- 4.8 The report carried out an assessment of the transportation effects of Perth West at a strategic level, against the key themes highlighted in the Regional Transport Strategy. These are identified and assessed as follows below:
- Economy – “to ensure transport helps to deliver regional prosperity”
  - Accessibility, Equity and Social Inclusion – “to improve accessibility for all, particularly those suffering from social exclusion”
  - Health and well-being – “to promote the health and well-being of communities”
  - Integration – “to improve integration, both within transport and between transport and other policy areas”.
- 4.9 Economy – Perth West does not have the potential to support regional prosperity to the same level as development Almond Valley. The A9/A85 junction improvements will provide better access for those wishing to reach employment opportunities at Inveralmond Industrial Estate and the centre of Perth, therefore encouraging more people to the area and in turn nurturing prosperity. Housing development at Perth West will be remote from these improvements and development at the site would not have the ability to enhance or support the benefits of the proposed junction improvements. Existing public transport, walking and cycling routes to employment opportunities are not adequate from Perth City West, as such the development would not prove attractive to people who would want to live there and commute sustainably to Perth centre.
- 4.10 Accessibility – Perth West does not present the same opportunities for promoting accessibility and social inclusion as Almond Valley. Key to its lack of ability to encourage social inclusion is its isolation from other emerging/supported development, employment areas, Perth and existing transport provision in the area.

- 4.11 The A85 and the Almond Valley area (if undeveloped) would present a barrier to movement between Perth West, Bertha Park and Inveralmond Industrial Estate. This limits sustainable travel opportunities and the benefits associated with collocation, limitations which could be avoided by developing Almond Valley in the first instance. With the improvements to the A85/A9 junctions, there will be limited benefits for trips associated with Perth West.
- 4.12 Health and Well Being – Perth West is limited in its ability to promote health and well being. It is isolated from emerging developments and Perth and therefore cannot support “walkable communities” other than within the site. The A85 is a barrier to movement to the north and the A9 is a barrier to the east. These discourage short distance walking and cycling routes. Distances to bus stops for a high proportion of Perth West are outwith the recommended walking threshold of 400metres and pedestrian routes to the bus stops are currently limited or inadequate.
- 4.13 Integration – Key to sustainable policies associated with new development is the ability to support integration between transport and land use planning. It is demonstrated in the report that Perth West presents less opportunity than Almond Valley to support integration. Perth is remote from the built up area and the A85 and A9 present significant barriers for movement particularly by sustainable travel modes. The site is not well connected by public transport and suffers from a lack of pedestrian facilities to the nearest bus provision to the east of the A9. Additionally, the development of Perth West is not compatible with the proposed improvements of the A9/A85 junction and the future Cross Tay Link Road, and can therefore not achieve full integration with these proposals.
- 4.14 Overall, Perth West does not support key transportation principles within the current proposed Plan because it is remote from other supported development areas, main employment opportunities and public transport provision.
- 4.15 In summary, Almond Valley offers the following transportation advantages over development at Perth West:
- Proximity to existing facilities, employment and retail opportunities
  - Proximity to other supported development areas, including Bertha Park
  - Has been considered as a development option within the Perth Western Expansion Area Study
  - Compatibility with A9/A85 junction improvement including pedestrian/cycle bridge
  - Compatibility with the Western Edge Link and subsequently the Cross Tay Link Road
  - Ability to attract further bus routes into the site
  - Improves social inclusion
  - Better meets with the transportation related objectives in the Main Issues Report and local guidance
  - Existing bus routes serve the site
  - NCR 77 serves the site linking to the north of Perth.
- 4.16 In a transportation context, Almond Valley will support and deliver necessary development in Perth Western Expansion Area, in accordance with the key principles of the TAYPlan to a much higher degree than Perth West.

## Landscape and Visual Impact

- 4.17 There are significant landscape and visual constraints associated with Perth West and this site should therefore not be the preferred location for a 'Long Term Strategic Development Area' in the Proposed Plan.
- 4.18 Savills submitted a landscape and visual impact assessment of the Perth Core Area strategic development areas prepared by ASH landscape consultants at the Main Issues Report stage of the new Perth and Kinross LDP. The main findings from this report are still valid to date since no further studies have been carried out on the Perth West site.
- 4.19 Perth West will directly impact on a substantial part of the AGLV immediately to the west of Perth. Policy 12 of the Perth Area Local Plan states that *"there would be a presumption against built development within the AGLV except for development necessary for operational need"*. This presumption against development within the AGLV is reiterated in Policy 53 of the Perth Area Local Plan. The development of the Perth West site for residential use will be contrary to current local plan policy which seeks to protect AGLV's.
- 4.25 Scottish Natural Heritage (SNH) Tayside Landscape Character Assessment (1999) shows that the whole of the Almond Valley site and the majority of the Perth West site (with the exception of the most southerly section overlooked by the A9) are located within a 'Lowland River Corridor' area.
- 4.26 The Landscape Character Assessment comments that *"...over-development in these areas could undermine the quality of the landscape and development plans for the area seek to steer additional housing towards existing settlements."* The Assessment continues *"...the Perth Area Local Plan raised the possibility of a 'new settlement' (termed Almond Valley Village) between Almondbank and Huntingtower..."*
- 4.27 The Assessment then states that *"...the alignment of the ring road/motorway and steeply rising ground to the south west and east broadly defines the physical extent of Perth and contains it within the wider landscape. A somewhat more ambiguous area lies to the north where development has been permitted to the north of the ring-road but to the south of the River Almond. The latter is hidden by woodland, so for people travelling along the A9 there is no obvious physical boundary to the northern part of the town."*
- 4.28 The SNH Character Assessment concludes that there should be an exploration of *"...the development of Almond Valley Village as a means of addressing the ambiguous pattern of development to the north and north west of Perth by firming-up the distinction between urban and rural and providing clear gateways to the town."*
- 4.29 This demonstrates that Almond Valley is much more acceptable in terms of existing landscape character than Perth West.
- 4.30 The A9 constitutes a very important gateway to Perth from the south, and if this view was modified by extensive residential development, this attractive gateway and its open panorama would be lost. As would the current obvious division between urban and rural, currently well delineated by the by-pass. The other key linear receptor in the area, the A85 would have open views to the south, as the site rises up to the Newhouse ridge. If this was to be populated by housing development, it would have an overbearing effect, both on the road users and adjoining residential receptors, in contrast to the current pleasant rural views.

## Deliverability

4.31 As per Section 3 above, paragraph 55 of Planning Advice Note 2/2010 provides the key tests in the assessment of the effectiveness of housing sites. These are:

- *Ownership*
- *Physical*
- *Contamination*
- *Deficit Funding*
- *Marketability*
- *Infrastructure*
- *Land Use*

4.32 In its consideration of Perth West against these criteria, the Council should be aware that Perth West is owned by several parties, including landowners and house builders. Part of the northern section of Perth West is effectively owned by Lloyds Banking Group after the administration of Elphinstone Estates. The deliverability of the project in the short term will be affected by current low land values rendering initial development unviable and raising significant questions as to the deliverability of significant housing over the plan period.

4.33 Option arrangements entered into at the height of the market are also likely to require unrealistic land values per acre and given the current economic climate there are serious questions marks over the potential for any housing to be delivered in the short term at Perth West. This situation is further exacerbated by the additional estimated £25 million infrastructure requirement for a new road junction at Broxden on the A9. It is unlikely that there will be any significant public funding available over the plan period to provide support for such infrastructure and it is difficult to foresee where such a cost could be borne entirely by the private sector with no immediate payback.

4.34 Without prejudice to the outcome of the Proposed Plan consultation, there is therefore serious doubt as to the soundness of the current 'Long Term Strategic Development Area' allocations. Should the Council continue to maintain the Perth West and Bertha Park allocations in the Proposed Plan then further detailed site feasibility studies including full development appraisals must be presented at the Examination in Public to properly test the effectiveness of the Proposed Plan 'Long Term Strategic Development Areas.'

4.35 In respect of the physical characteristics of the site, as stated above, there are significant landscape and visual constraints associated with Perth West and any development will significantly impact on a substantial part of the currently allocated AGLV immediately to the west of Perth as well as on the Methven Castle designed landscape.

4.36 No site investigations have been undertaken to show that the area is free from contamination. There is therefore the potential requirement for remediation of the site.

- 4.37 In respect of deficit funding, the infrastructure required to deliver Perth West has not been thoroughly assessed. Given that the allocation of Perth West would fragment the strategic land allocations in this part of Perth, requiring an additional new major road junction at an estimated additional cost of £25 million, it is likely that a very significant level of public sector funding would be needed to make housing development at Perth West viable.
- 4.38 Considerable work has been undertaken by Perth and Kinross Council and the Pilkington Trust to ensure that the required infrastructure improvements and funding can be delivered. Continuing to include Perth West as a preferred option for strategic housing in the Perth Core Area will be at considerable expense to Perth and Kinross Council.
- 4.39 The work already undertaken by the Council (on which the Council has spent at least £17,945.69) to assess infrastructure requirements for the required road infrastructure will be required to be re-visited. The work on the Perth Western Expansion Study and the Council's planning application for the road infrastructure to facilitate Almond Valley took four years from inception to the submission of a detailed planning application for the new A85/A9 road junction.
- 4.40 Given Perth West requires an additional new road junction over and above that needed for Almond Valley (see Figure 2 above), it is very unlikely that Perth West will be an effective site and able to contribute to the five year housing land supply requirements. This will place a further delay on the delivery of significant housing in the Perth Core Area. Almond Valley is the only strategic housing option that can deliver significant levels of new housing up to 2024.
- 4.41 In respect of marketability, there is no indication that ownership, access and landscape and visual impacts can be overcome and the significant level of additional assessment that will be required for Perth West to be deliverable means that there is no prospect of Perth West being developed over the plan period.
- 4.42 Perth West has not been properly assessed in terms of its ability to provide funding support towards required infrastructure improvements. If the Proposed Plan continues to include Perth West as a preferred strategic housing site, the detailed design work and option appraisal for the A85/A9 junction improvements would have to be carried out again which would be at a great cost to the Council.
- 4.43 Almond Valley, linking with other key neighbouring site allocations for employment and retail use and the long term housing site at Berth Park will together enable the delivery of the required roads infrastructure for this part of Perth which has already been designed by the Council. Any fragmentation of the existing land allocations will severely impair the Council's chance of delivering any strategic housing within the next five years.
- 4.44 Planning officers have recognised that Perth West is not a deliverable housing site for the period of the new Local Development Plan. This decision was overturned by members.
- 4.45 The Council must now reassess its decision given the significant issues surrounding the deliverability of Perth West. Should the Proposed Plan which is issued to Scottish Ministers prior to the Examination in Public not include Almond Valley as an alternative or additional Strategic Development Area, the Council will be held not to have an effective housing land supply.



## 5. Bertha Park

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- 5.1 Bertha Park has also been upgraded in the Proposed Plan from an allocation of 200 units up to 2024 (page 73, Draft Proposed Plan – Appendix 4) to an allocation of 750 houses (page 69 Proposed Plan – Appendix 3). There is no reasoned justification for this in the Proposed Plan.
- 5.2 The site is now classified along with Perth West as one of two ‘Long Term Strategic Development Areas’ in the Proposed Plan. It has an identified potential for 3,000+ houses and over 25ha of employment land (178 ha site). Bertha Park requires the development of detailed proposals leading to the preparation and implementation of a masterplan. The Proposed Plan (page 77) sets out that the masterplan, together with that for employment site E38 Ruthvenfield Road (which is part of the Almond Valley site) will require to be integrated to provide for economies of scale and linked service provision. As part of this process the developers will be expected to demonstrate economic viability and that the site is capable of being delivered without undue strain on the public purse.
- 5.3 As stated and illustrated above, the delivery of a strategic housing development at Almond Valley is a prerequisite for the delivery of Berth Park. Figure 1 illustrates the synergy between the two sites. The Proposed Plan as currently formed will not allow the funding of the road infrastructure through Almond Valley to open up the Berth Park site for long term housing development.
- 5.4 The key matters for the Council’s consideration should therefore be as follows:
- Almond Valley will deliver the required highways improvements to open up the longer term strategic housing development at Bertha Park
  - The Council’s has spent considerable time and money to consider options for the delivery of the A85/A9 junction improvements which will make the development of Bertha Park viable.
  - The Proposed Plan retains an industrial land allocation at Ruthvenfield Road from the Almond Valley site. This will not be capable of funding the road infrastructure improvements in isolation. The opportunity to link existing industrial facilities at Inveralmond with the land at Ruthvenfield Road and to improve connectivity into that area will also be lost.
  - The allocation at Bertha Park will be ineffective in PAN 2/2010 terms should Almond Valley not proceed
  - The synergy between this well thought out strategy and the incoherence of the Proposed Plan is clearly illustrated by Figures 1 and 2 above.



## **Bertha Park - Major Infrastructure Requirements**

- 5.5 The Council instructed the Perth Western Expansion Area Study in 2008 to assess the infrastructure requirements and costs for the future development of North West Perth. The findings of the study presented to the Enterprise and Infrastructure Committee on 26 August 2009 were based on the fact that Almond Valley is the only realistic strategic housing site for the Perth Core Area and that it will help bring forward the development of Bertha Park and support the long term growth of Perth.
- 5.6 There is vital need for economic development plan at Inveralmond and this can only be unlocked by an overall development strategy for North West Perth (see Figure 1, Section 2 above).
- 5.7 The study demonstrates that the north western edge improvements are essential to the wide Perth network, particularly providing new linkages from Crieff Road to Inveralmond Industrial Estate, a new future link through the Bertha Park Link and ultimately linking to the proposed new Cross Tay Link.
- 5.8 Almond Valley is adjacent to the employment area at Inveralmond Industrial Estate and Bertha Park which therefore creates an opportunity to provide an integrated transport network for all relevant modes.
- 5.9 The Proposed Plan specifies that a new crossing of the River Almond will be required at the commencement of development. This can therefore only be delivered through a cohesive strategy which would include infrastructure provided as a result of Almond Valley.
- 5.10 The proximity to the strategic road network combined with the new proposed distributor road linking Almond Valley to the improved A9/A85 junction, will minimise the distance travelled on the local road network
- 5.11 The delivery of Bertha Park is linked to transport connections to the A9/A85 junction and to the A9 in associated with the proposals for Cross Tay Link Road.
- 5.12 All the work undertaken by Perth and Kinross Council and the Pilkington Trust to date has enabled the Council to submit a detailed planning application for the highways improvements originally identified in the Perth Western Expansion Area Study.
- 5.13 Should Almond Valley not be included in the Proposed Plan issued to Scottish Ministers, the detailed design work carried out by the Council will have to be redone which in turn would lead to significant delay in delivering any new housing land to the west of Perth and therefore jeopardising the delivery of Bertha Park.

## **Deliverability**

- 5.14 Bertha Park, unlike Perth West, is within a single ownership. This will allow the developer to bring forward a cohesive masterplan for the whole site. The Proposed Plan sets out that it is the Council's preferred option to identify a range of major strategic sites capable of accommodating new or expanded sustainable communities. Bertha Park has the ability to link in with Almond Valley to provide one new community to the north west of Perth whilst delivering the necessary road infrastructure funding.

- 5.15 We therefore support Bertha Park as a long term strategic development area but would like the Council to recognise that the delivery of Bertha Park rests on essential infrastructure improvements which can only be funded by the delivery of Almond Valley.
- 5.16 Given the fact that only the infrastructure provided as a result of Almond Valley can open up Bertha Park for longer term strategic housing, as currently formed, the Proposed Plan is ineffective as Bertha Park cannot support the level of infrastructure required to be delivered in isolation.
- 5.17 The Proposed Plan must therefore revert to that as presented to committee in the Draft Proposed Plan (Appendix 4) in order for the Council to have a coherent, deliverable housing strategy for the Perth Core Area.

## 6. Summary of Representation

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- 6.1 It is requested that the Proposed Plan is changed to include the Almond Valley site as previously set out in Chapter 4 to the Draft Proposed Plan (Appendix 4) submitted to the Perth and Kinross Full Council meeting on 10<sup>th</sup> January 2012.
- 6.2 The Proposed Plan as currently formed has not been subject to the same rigorous assessment as the Draft Proposed Plan submitted to the Full Council meeting on 10<sup>th</sup> January.
- 6.3 Changes made to the Proposed Plan at the meeting are based upon political expedience rather than the proper reasoned planning assessment undertaken over a four year period by Council officers and the Pilkington Trust in demonstrating the viability and deliverability of Almond Valley.
- 6.4 As currently formed, the Proposed Plan completely disregards the practical and financial realities of delivering the required major housing growth which is required for the Perth Core Area. It results in a requirement for an additional major junction upgrade at Broxden and denies the long term strategic opportunity at Bertha Park an essential access through Almond Valley rendering both Perth West and Bertha Park undeliverable in their current context. This effectively delays the delivery of significant new housing for at least 10 years.
- 6.5 Rather than facilitating redevelopment, the Proposed Plan will mean that there will be no significant housing development in the Perth Core Area over the plan period which will have major implications for the City of Perth and the wider Council area. Almond Valley is a long standing strategic housing site, which has been thoroughly assessed by both officers of the Council, statutory bodies and professional advisers to the Pilkington Trust.
- 6.6 Neither of the alternative sites which the Council has (Bertha Park H7 and Perth West H70) has the ability to deliver housing in the short or medium term. This is confirmed in the Proposed Plan (pages 77 and 78) which redefines these sites as 'Long Term Strategic Development Areas.'
- 6.7 The remaining industrial land within the Almond Valley site will never be capable of being developed as the proposed A85/A9 road infrastructure improvements will be incapable of being funded without the strategic housing at Almond Valley.
- 6.8 The site at Perth West is fundamentally flawed through the requirement to provide an additional new major road junction at Broxden as well as by ownership, landscape, visual impact and local access issues.
- 6.9 In line with Scottish Planning Policy (SPP) paragraphs 70-76, Council's have a statutory duty to provide at least a five year effective housing land supply. The requirement for the Perth Core Area is set out in TAYPlan. Whilst the numbers shown in the Proposed Plan may theoretically satisfy the requirements for housing, it is clear from the reasons stated above that they do not provide a realistic or an effective five year housing land supply. It is important for this to be addressed by the Council prior to the Proposed Plan being issued to the Scottish Ministers.

- 6.10 A planning application, supported by all the required supporting information, has been prepared and submitted. This demonstrates that Almond Valley is an effective and deliverable strategic housing site. Officers of the Council agreed this position in both the Proposed Plan Committee Report (Appendix 1) and the Planning Application Committee Report (Appendix 2).
- 6.11 It is submitted that the Council should now consider the viability of the current Proposed Plan and accept that if there is to be any new housing growth in the Perth Core Area in the short term that Almond Valley must be included in the Proposed Plan going forward. Not to do so will significantly impair the Council's ability to engender sustainable economic growth, attract further new investment and jobs and effectively disadvantage the city as Scotland emerges from recession.
- 6.12 It is therefore respectfully requested that the Council amend the Proposed Plan to include Almond Valley as a Strategic Development Area.

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

Perth 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](mailto: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 10<sup>th</sup> 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	MONTAGU EVANS LLP
Address and Postcode	4TH FLOOR, EXCHANGE TOWER 19 CANNING STREET EDINBURGH, EH3 8EG
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.	7.17	or			
Site ref.	H54	or			
Chapter	7	Page no.	234 - 235	Paragraph no.	7.17 - 7.17.3

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

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

PROPOSED EXTENSION TO HOUSING ALLOCATION H54 TO INCORPORATE LAND TO THE EAST.

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

PLEASE REFER TO ATTACHED LETTER (REF AC/SV9224/06) AND ATTACHED PLANS.

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

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

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

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AC/SV9224/06

10 April 2012

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

Dear Sir / Madam

## PERTH AND KINROSS LOCAL DEVELOPMENT PLAN – PROPOSED PLAN

We act on behalf of John Beales Esq., who has an interest in land at Scotlandwell, Kinross. We submit for your attention a response to the Perth and Kinross Local Development Plan (Proposed Plan), with respect to Housing Allocation H54, Scotlandwell. We have previously submitted comments to the Main Issues Report in February 2011 and to the 'expressions of interest' in June 2009

Our client's land is located to the south of Scotlandwell. A plan is enclosed which illustrates our client's land ownership boundary (Plan 1). The site bounds the housing allocation H54 which is allocated for 30 residential units in the Proposed Plan. Our submission supports the principle of residential development south of Scotlandwell, but objects to the size of H54 and considers this should be extended eastwards to incorporate part of our client's land. It should be noted, that these representations do not promote development of all of our client's land. As confirmed in our comments to the Main Issues Report, our client supports development on part of the land, and would consider the option of development on the remaining land as part of any future development plan. Plan 1 also illustrates the proposed boundary extension to H54.

A portion of our client's land formed part of House Site D Scotlandwell within the Main Issues Report for the Perth and Kinross Local Development Plan. The Main Issues Report proposed a housing allocation of 20-30 housing units and our comments to the Main Issues Report supported the allocation of land for residential development. The comments supported the amount of land allocated as well as the proposed number of units to be developed on the land.

The Proposed Plan promotes residential development at land to the south of Scotlandwell (H54) and has recommended that the village can sustain a development of 30 residential units. This is the upper end of the housing numbers that the Main Issues Report suggested. However, the Proposed Plan allocates a smaller area of land to accommodate these units. Our client considers that if 30 residential units are required at Scotlandwell, then the proposed H54 land allocation should be extended to accommodate some of our client's land, (as outlined in the attached plan).

The following sets out the reasons as to why it is considered that the proposed housing land allocation at Scotlandwell should be extended to support a development of 30 residential units.

### 1) Housing Density

Our client considers that the extension of the H54 boundary eastwards will allow for a lower density development that will be more inkeeping with village of Scotlandwell.

The current proposed housing density for H54 is 18 units per hectare. This is within the upper range of the medium housing density as illustrated in the Proposed Housing Density Ranges on page 65 of the Proposed

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Plan. It is considered that a new housing development at Scotlandwell should be inkeeping with the local area and provide for a lower density development. The recently approved Wellside development to the south west of the village is 13 units per hectare and it is considered that this is a more suitable housing density, if further growth is to be supported at Scotlandwell.

We have reviewed the other housing allocations in the Proposed Plan, within the Landward area, that are on greenfield land, and it can be seen that the Scotlandwell allocation is at a higher density than these:

- Balado – 12 units per hectare
- Powmill – 13 units per hectare

The Main Issues Report Site D allowed for approximately 10 units per hectare (based on 30 units on the site). Our client does not consider that all of Site D should accommodate the H54 housing allocation (which would require more than 100% increase on the H54 site area). However if the site was extended by 50%, it would allow for a density of 12 units per hectare. The attached plan illustrates a 50% extension.

Scottish Planning Policy states that 'the density of new development should be determined in relation to the character of the place and its relative accessibility, with higher densities appropriate at central and accessible locations'. The proposed extension to the village of Scotlandwell is located south of Leslie Road. The Scotlandwell Conservation Area Appraisal refers to the surrounding area of Leslie Road as 'generally lower in density' compared with the original part of the village at Main Street. It is submitted that the density of the proposed allocation at Scotlandwell should reflect the surrounding area of Leslie Road and be of a low – medium density. It is submitted that this would be in accordance Scottish Planning Policy.

Policy PM1B c) of the Proposed Plan considers that design proposals should, 'complement its surroundings in terms of appearance, height, scale, massing, materials, finishes and colours'. Our client supports this policy, and submits, that in order to fully meet this objective, the proposed H54 allocation should be extended to provide a lower density development.

Our client has an asserted right of vehicular access to their site along the northern edge of H54. It is submitted that this reduces the amount of developable land at H54. Together with the concerns regarding housing density, it is submitted that the H54 allocation should be extended eastwards to allow for a lower density development that is in keeping with the current development form in the village.

## 2) Open Space

Policy CF1B within the Proposed Plan states that, 'the Council will seek provision of appropriate areas of informal and formal open space that it is accessible to all users as an integral part of any development where existing provision is not adequate'. Our client supports this policy and considers that if the H54 allocation were to be extended a formal area of open space could be provided south of Friar Place.

There is an existing area of open space at Friar Place. This is located north east of the current H54 proposal and directly north of our client's land. (This is illustrated on Plan 2). It is our understanding from discussions with Perth and Kinross Council that there is a requirement to maintain the area of open space and burial ground and for there to be a viewpoint from the burial ground looking south. Our client supports the protection of this open space within the Proposed Plan.

Should the H54 allocation be extended eastwards, there is an opportunity to extend the area of open space south into an extended H54. This could provide a formal area of open space for the benefit of all Scotlandwell residents. Pedestrian links with the village could be formed which would integrate the new development with the existing village. Scottish Planning Policy states that, 'Development plans should encourage and enable the creation of successful places which contribute to the identity of the area'. It is submitted that this is an opportunity to enhance the current land allocation and create an area for the whole community. Scottish Planning Policy also states that, 'New housing developments should be integrated with public transport and active travel networks, such as footpaths and cycle routes' and that, 'new streets should connect well with existing streets'. The inclusion of an area of open space within an extended H54 allocation, at this location, will ensure direct pedestrian links with the existing village through Friar Place. Plan 2 indicatively illustrates how the proposed open space could be incorporated into an extended H54 allocation, with a green arrow.

Policy PM1A of the Proposed Plan states that the proposals for new development should, 'create and improve links within and, where practical, beyond the site.' Our client supports this policy and submits that the opportunity to link the area of open space at Friar Place within an extended H54 allocation would enhance development at the site.

It is submitted that the extension to H54 would enable areas of private and public open space to be developed and provide connectivity within the village through new green corridors whilst also protecting the southern viewpoint from the burial ground within the Conservation Area.

### 3) Visual Impact and Landscaping

The Scotlandwell Conservation Area Appraisal states that the 'compact size and location of Scotlandwell means that the surrounding topography plays a key part in its character'. Our client undertook a landscape character appraisal in 2009 and this outlined the key viewpoints to and from the site. The site is not located within an Area of Great Landscape Value, however the open approach from the south makes it particularly sensitive to appearance, height and massing of new development. It is submitted that any form of development south of the village should be sensitively designed and take into account viewpoints from the local area, but also further afield such as Vane Hill and Craigend Hill, located south of the village.

Recent development has taken place to the west of the village at Wellside. This provides a boundary to the village of 2 storey housing. It is submitted that any development at H54 and my client's proposed extension to H54, should be sympathetic to the existing single storey properties on Leslie Road and Friar Place and also provide high quality landscaping as an edge to the village.

Policy PM1A states that, 'the design and siting of development should respect the character and amenity of the place.' Our client supports this policy and considers that an extension to the H54 allocation would allow for a lower density development that is in keeping with the immediate surroundings at Friar Place and Leslie Place.

Policy PM1A also states that proposals 'should also incorporate new landscape and planting works appropriate to the local context and the scale and nature of development'. Our client supports this policy and considers that the proposed boundary extension to H54 will create a natural eastern boundary where landscaping could be incorporated to create a natural buffer to the east.

Policy PM1B lists a set of place making criteria that new proposals should meet. Part b) of the criteria requires new proposals to 'consider and respect site topography and any surrounding important landmarks, views of skylines'. It is submitted that in order for H54 to fully meet this objective, an extension eastwards would allow for the provision of safeguarding the viewpoint from the Burial Ground.

Part c) of Policy PM1B considers that the design of proposals should, 'complement its surroundings in terms of appearance, height, scale, massing, materials, finishes and colours'. Our client supports this policy and submits that in order to fully meet this objective, the proposed H54 land allocation should be extended to provide a lower density development.

It is submitted that an extension to the H54 land allocation would allow for any new proposal to provide a development that is visually acceptable within the surrounding area and therefore be in accordance with the Scotlandwell Conservation Area Appraisal and the relevant policies contained within the Proposed Plan.

### 4) Local services for Scotlandwell

Scotlandwell is a popular starting point for the Loch Leven Heritage Trail. However, there are very few areas for visitors to park their cars. The Proposed Plan states that, 'encouragement will be given to proposals which provide additional parking or path improvements to serve the Green'. It is considered that if the H54 site is extended, there could be the ability to provide additional parking for the village. This could be used to serve the Green and links to the Loch Leven Heritage Trail. In its current form, it is unlikely that the H54 allocation could provide for this type of community benefit.



5) Loch Leven Catchment

A housing allocation at our client's site will not impact upon the Loch Leven Catchment Area and is therefore in accordance with the proposed housing strategy outlined in the Proposed Plan.

6) Prime Agricultural Land

Our client's site is graded as 3.2 by the Macaulay Land Use Institute and is not Prime Agricultural Land. Scottish Planning Policy considers Prime Agricultural land to be a 'primate resource'. The allocation of my client's land as part of H54 would not lead to the loss of Prime Agricultural Land.

7) Portmoak Airfield

Our client's site is affected by the Portmoak Airfield and will therefore require to adhere to Perth and Kinross' Airfield Safeguarding Policy of December 2011. This allows for development of up to 10metres in height. It is considered that a proposed residential development within our client's site will not be affected by this requirement.

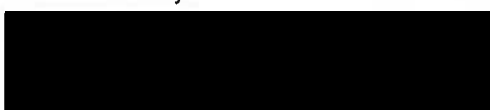
8) Scotlandwell Conservation Area

Our client's site is not located within the Conservation Area. However our client is committed to providing a sensitively designed development that will contribute towards the Scotlandwell Conservation Area. It is submitted that an extension to the H54 allocation, will allow for a lower density development that is more in keeping with the village and the Conservation Area status.

Overall, it is submitted that our client is in support of new development to the south of Scotlandwell, however objects to the current size of H54 for 30 units. It is submitted that the extension of H54 eastwards will allow for a lower density development which is more in keeping with the surrounding area. The extension will also allow for the creation of an area of open space whilst protecting key viewpoints from the village, looking south, and could provide for additional car parking within the village. It is submitted that by extending the current H54 allocation, the allocation would be in accordance with the relevant planning policies contained within the Proposed Plan, along with Scottish Planning Policy.

We would be pleased to discuss this representation further with you, should you have any queries.

Yours faithfully



**MONTAGU EVANS LLP**

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

Perth 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	NHS Tayside
Address and Postcode	c/o Alan R Farningham KCC Consulting Ltd 47 Timber Bush, Leith, Edinburgh, EH6 6QH
Telephone no.	
Email address	

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

### 2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	PERTH SETTLEMENT MAP	or			
Chapter	5.2 PERTH	Page no.	81	Paragraph no.	Mixed Use Opportu

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.

There is no objection to the specific mixed-use opportunity sites listed for Perth City in Section 5.2 of the Plan. However, it is requested that an additional site be included for the former Nurses Home, Perth Royal Infirmary as delineated in red on the attached plan. The site extends to 0.53no. hectares. With respect to Site Specific Developer Requirements, there would be no objection to the site being the subject of narrative which required the Category (C)s listed buildings and associated listed structures to be retained, with any alterations (including internal works) requiring listed building consent. There would also be no objection to a reference requiring any new use(s) to be compatible with the existing general character of the buildings

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

and the spaces and features within them. Preferred uses would be residential, office, institutional or leisure/hotel uses.

Perth City forms part of the Perth Core Area which is identified in TayPlan as being the location for the majority of future development in Perth and Kinross as articulated by Policy 1: Location Priorities. (Page 9)

Within this policy context TayPlan, consistent with Government Policy, prioritises the reuse of previously developed (brownfield) land and buildings, particularly listed buildings, within principal settlements such as Perth City ahead of any other land. (Part B, Page 9)

It is acknowledged that as per Paragraph 5.1.10, Page 69 of the Proposed Plan, windfall or brownfield sites are expected to account for 10% of the future housing land requirement. In this regard, it is recognised that there is a presumption in favour of developing windfall/brownfield sites within the Proposed Plan (i.e. Paragraph 5.1.1, Page 67 states that the strategy firstly seeks to utilise brownfield land within the settlements) and that, subject to satisfying specific technical, environmental and listed building criteria, future development of the site, even without a specific mixed-use opportunity designation including residential, would likely be considered favourable in principle.

This presumption in favour of developing windfall or brownfield sites is given further support as it relates specifically to listed buildings by Policy HE2: Listed Buildings of the Proposed Plan, Page 38.

Notwithstanding, specifically allocating the site as a mixed-use opportunity in the Proposed Plan would provide greater certainty for the site's landowners in terms of planning for its future development and, significantly help assist in providing the necessary funding in an environment of continued financial constraint.

Furthermore, it would help deliver a site which could, if developed for housing, supplement the effective land supply and future housing land requirement in the short term, which is heavily reliant on the deliverability of major housing land allocations such as H70 Perth West (3,000+) and H7 Bertha Park (3,000+).

In this latter regard, Paragraph 5.1.17, Page 70 of the Proposed Plan recognises that delivering the key projects will take many years, resulting in a number of sites being constrained until the infrastructure is in place or under construction.

**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.**

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.

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Address and Postcode	c/o Alan R Farningham KCC Consulting 47 Timber Bush, Leith, Edinburgh, EH6 6QH
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If making a representation on Supplementary Guidance, please state the name of the document:

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

Policy ref.	<input type="text"/>	or			
Site ref.	PERTH SETTLEMENT MAP	or			
Chapter	5.2 PERTH	Page no.	80	Paragraph no.	Residential Sites

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.

There is no objection to the specific residential development sites listed for Perth City in Section 5.2 of the Plan. However, it is requested that an additional site be included for the land at Murray Royal Hospital as delineated in red on the attached plan. The site extends to 10.0no. hectares and could accommodate up to 250no. houses based on a density of 25no. houses per hectare. With respect to Site Specific Developer Requirements, if specifically allocated, there would be no objection to the site being the subject of a Masterplan and Development Brief to ensure appropriate phasing and that any future design took account of the site's listed buildings, surrounding residential area and, the adjoining conservation area to the south,

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

with links to core path networks and further structure planting as appropriate.

Perth City forms part of the Perth Core Area which is identified in TayPlan as being the location for the majority of future development in Perth and Kinross as articulated by Policy 1: Location Priorities. (Page 9)

Within this policy context TayPlan, consistent with Government Policy, prioritises the reuse of previously developed (brownfield) land within principal settlements such as Perth City ahead of any other land. (Part B-Page 9)

It is worth noting that the site (albeit slightly larger at 14.4no. hectares), was previously identified as a specific housing allocation PH1 for 232no. houses in the Perth Area/Central Area Draft Local Plan 2004. No rationale or explanation has been provided for its exclusion from the Proposed Plan. The site has no infrastructural constraints and is deliverable.

It is acknowledged that as per Paragraph 5.1.10, Page 69 of the Proposed Plan, windfall or brownfield sites are expected to account for 10% of the future housing land requirement. In this regard, it is recognised that there is a presumption in favour of developing windfall/brownfield sites within the Proposed Plan (i.e. Paragraph 5.1.1, Page 67 states that the strategy firstly seeks to utilise brownfield land within the settlements) and that, subject to satisfying specific technical and environmental criteria, future development of the site, even without a specific residential allocation, would likely be considered favourable in principle.

Notwithstanding, specifically allocating the site for residential development in the Proposed Plan would provide greater certainty for the site's landowners in terms of planning for its future development and, significantly help assist in providing the necessary funding in an environment of continued financial constraint.

Furthermore, it would help deliver a site which would supplement the effective land supply and future housing land requirement in the short term, which is heavily reliant on the deliverability of major housing land allocations such as H70 Perth West (3,000+) and H7 Bertha Park (3,000+).

In this latter regard, Paragraph 5.1.17, Page 70 of the Proposed Plan recognises that delivering the key projects will take many years, resulting in a number of sites being constrained until the infrastructure is in place or under construction.

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

Name	A&J Stephen Ltd and Mr David Smythe
Address and Postcode	c/o Alan R Farningham KCC Consulting Ltd 47 Timber Bush, Leith, Edinburgh, EH6 6QH
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?

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

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

Policy ref.	<input type="text"/>	or			
Site ref.	METHVEN SETTLEMENT PLAN	or			
Chapter	5.30 - METHVEN	Page no.	136-137	Paragraph no.	5.30.2

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.

Object to the statement in Paragraph 5.30.2 of the Plan that “no further housing development is required in the village during the life of the Plan”.

Request that this is deleted and replaced with “A small scale residential development opportunity is identified on the south side of the village “as delineated in red and graphically illustrated on the attached respective site and indicative sketch plans. A more detailed layout plan can be provided, if the principle of development at this location is considered acceptable.

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

Methven is a principal settlement within the “Perth Core Area” which is identified in TayPlan as being the location for the majority of future development in Perth and Kinross as articulated by Policy 1: Location Priorities (Page 9). It is also outwith the proposed Green Belt.

The strategy of the LDP not to allocate any further land for development in Methven given its “principal settlement” status, seems at odds with TayPlan’s Policy 1. There is also no rationale or explanation in the LDP as to why it is considered that (the extant planning permission on the east side of the village for 103no. houses aside), no further housing development is required in the village during the life of the Plan.

Furthermore, it seems strange that although Paragraph 5.30.3 of the Plan highlights development requirements under “Infrastructure Considerations”, which is presumably for new development, the Plan proposes no new development.

The proposed site would help provide for increased variety and housing choice in the village. It would also create a new focus for the village, including off-street car parking which it currently lacks, in a central location close to existing retail uses.

In accordance with Paragraph 5.1.17, Page 70 of the LDP, the site area does not exceed 0.5ha, thereby allowing its early release for development. There is an agreement between the landowner, Mr David Smythe and A&J Stephen to develop the site. It is therefore effective and deliverable in the short term. There are also no technical or environmental constraints to its development and, an appropriate access onto Main Street can be satisfactorily achieved.

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Name	David Smythe
Address and Postcode	c/o Alan Farningham KCC Consulting Ltd 47 Timber Bush, Leith, Edinburgh, EH6 6QH
Telephone no.	[REDACTED]
Email address	[REDACTED]

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Site ref.	METHVEN SETTLEMENT PLAN	or			
Chapter	5.30 - METHVEN	Page no.	136-137	Paragraph no.	5.30.2

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.

Object to the lack of land identified for additional employment generating uses in the Plan. Also, object to the statement in Paragraph 5.30.2 of the Plan that “no further housing development is required in the village during the life of the Plan”.

Request that this is deleted and after “protected for employment uses” the following is inserted: “A mixed-use development opportunity to include for employment generating and housing uses is identified on the south-west edge of the village” as delineated in red on the attached site plan. A more detailed layout plan can be provided, if the principle of development at this location is considered acceptable.

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

Methven is a principal settlement within the “Perth Core Area” which is identified in TayPlan as being the location for the majority of future development in Perth and Kinross as articulated by Policy 1: Location Priorities (Page 9). It is also outwith the proposed Green Belt.

The strategy of the LDP not to allocate any further land for development in Methven given its “principal settlement” status, seems at odds with TayPlan’s Policy 1.

Furthermore, it seems strange that although Paragraph 5.30.3 of the Plan highlights development requirements under “Infrastructure Considerations”, which is presumably for new development, the Plan proposes no new development.

The proposed site would, consistent with Policy ED1B, Page 25 of the LDP, help promote the integration of employment generating opportunities with housing, thereby reducing the potential need to commute between home and employment. It would also provide for balance and increased variety and housing choice at the west end of the village.

The site is effective and deliverable given the commitment of the landowner. There are also no technical or environmental constraints to its development and, an appropriate access onto the A85 Crieff Road can be satisfactorily achieved.

The specific allocation of land for employment generating uses in Methven would be consistent with similar designations for other principal settlements within the Perth Core Area such as Scone, Almondbank and Luncarty as detailed in the table in Paragraph 5.1.7, Page 68 of the LDP, where such land has been identified to provide for increased choice and flexibility.

There are known traffic issues associated with servicing the village’s existing employment uses in the area along both James Street and Station Road and at their respective junctions with Main Street, due to narrow road widths and poor visibility.

The proposal would provide for a new gateway into the village from the west and, more importantly, allow for a new safer and more accessible road to be provided off the A85, funded by the housing element of development, to the benefit of amenity and road safety for residents in these streets. Such a proposal was given strong local support at a recent public consultation exercise carried out by the landowner and his advisors.

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**From:** David Fenwick [REDACTED]  
**Sent:** 05 February 2012 18:00  
**To:** TES Development Plan - Generic Email Account  
**Subject:** Proposed Local Development Plan, Proposal for Development at Thimble Row Car Park, Perth  
**Follow Up Flag:** Follow up  
**Flag Status:** Green

From

Ms J McEwen, Flat 20, West Wing, King James VI Hospital Building, Hospital Street, PERTH PH2 8HP

To  
Ms B Murray, Team Leader - Development Plans, Planning and Regeneration Service, Perth and Kinross Council, Pullar House, 35 Kinnoull Street, PERTH PH1 5GD

Dear Ms Murray

My representation refers to Perth and Kinross Council's proposal for the above site - reference OP2. It appears that the Council's proposition is to develop the whole of the car parking space on this site - ie from the Ladeside, past the electric substation and through all car parks ending behind what was the 'Once a Tree' shop - from car parking to mixed uses such as business, residential and retail. As the Council's 26 January 2012 letter to this effect makes no mention of car park retention or creation, the only assumption to be made is that this proposal will result in very significant loss of car parking facilities in this Old High Street area of the town. If such a loss is the intention, I formally object to the proposal for the following reasons:

Firstly, Perth and Kinross Council has over considerable time, progressed the systematic reduction in parking opportunities in Perth town centre through pedestrian programmes and approval of residential units with inadequate or no parking facilities, thus pressurising resident, business, visitor, worker and tourist alike. This has combined with the Council's policies of encouraging increasing numbers of elderly, frail, sick, disabled and young family flat dwellers into this area who require car ownership or support from car owning helpers/carers. Such pressure can only be further seriously exacerbated by this proposal.

Secondly, these consistently well used car parks provide town centre West car parking opportunity to visitor/business/tourist/worker and non town centre resident drivers from Northern, Southern and Western directions without having to progress further into the town centre core. It has been well known to Perth and Kinross Council for a considerable number of years that residents of Atholl Street suffer maximum levels of vehicle emission particulates that can lodge in the lungs and cause serious health problems, so deflecting vehicles from using Atholl Street for parking searches within the inner core of the town centre by continuing significant parking at OP2 is to be supported.

Thirdly, any proposal for such very significant car parking loss will seriously and negatively impact on the Tourist Headquarters, the Mercure Hotel and the small independent traders in Old High Street and surrounds. It will reduce the Hotel to a small, traditional area of courtyard parking inadequate for proper and correct function.

Thank you for your attention

Yours faithfully

Joan H E McEwen

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**From:** David Fenwick [REDACTED]  
**Sent:** 11 March 2012 16:47  
**To:** TES Development Plan - Generic Email Account  
**Subject:** Proposed Perth and Kinross Local Development Plan (LDP)  
**Follow Up Flag:** Follow up  
**Flag Status:** Green

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

From: Ms J McEwen, Flat 20, West Wing, King James VI Hospital Building, Hospital Street, PERTH PH2 8HP.

Dear Sirs

I submit my representations on the proposed plan for the Perth and Kinross Local Development Plan (LDP) which follows on from the 2010 Main Issues Report to which I contributed. I considered at the time of the MIR that the growth rate on which this proposed plan is predicated was neither desirable or sustainable and I hold to that previously expressed view. Perth and Kinross Council officers are to be commended on highlighting that much of this proposed LDP Plan requires major infrastructure to be in place prior to development and relies critically on considerable upfront financial commitment from the Scottish Government and the private sector.

My representations are as follows:

3.4.7 Policy RC1 Town Centre Prime Retail Areas and

3.4.8 Policy RC2 Perth City Centre Secondary Uses Area

As in the previous local plans system, the protection of residential amenity and that of existing surrounding property are included as essential and explicit core values and commitments and as such, are welcomed and fully supported.

3.5.6 Policy RD2 - Pubs and Clubs

This was a key draft policy during the Council term 2003-2007, receiving full support from all quarters. It is welcomed and fully supported.

Policy NE3: Biodiversity

The commitment to embedding biodiversity within Council structures, particularly Planning and Development Control is welcomed and fully supported. This statutory duty was not always apparent in past Planning and Development Control papers.

3.9.10 Policy NE6: Perth Lade Green Corridor

The Lade Management Plan 2011-2031 is welcomed and fully supported but I also hold to my previously expressed view that owing to the rare fauna and flora within the Lade (as identified by the Council's commissioned consultancy report on the Lade several years ago) that the Lade should have SSSI status or at least be designated a 'special protection area'.

3.11.4 Policy EP2: New Development and Flooding

In noting this and associated water environment and drainage related matters, Perth and Kinross Council itself has a duty of care and must lead by example to ensure current and future water systems and courses within its responsibility are well maintained, regularly cleaned and kept free flowing through good budgetary and housekeeping principles that provide and apply adequate staffing levels, machinery and equipment to the fundamental issue of flooding.

3.11.13 Policy EP11: Air Quality Management Areas (and 5.1.13, 5.1.14 and 5.1.15)

This underlines my already submitted objection to specific site proposal OP2. Taking away most or all parking at OP2 is contradictory to this proposed policy.

5.1.11 I understand that H5 Almond Valley has, at the behest of Councillors, been removed completely as a housing site identified to contribute to the 7 year effective land supply. This has resulted in a considerable 'knock-on' effect to Bertha Park where house numbers have been significantly increased and has led to the introduction of substantial housing at Perth West. Whilst supportive of a reduction in house numbers for Almond Valley I submit that it could surely accommodate some housing rather than its complete removal whatsoever from this element of the LDP.

Lastly, I have made previous representation on another site specific issue namely the re-coding of the Old Granary Building, 61 West Mill Street to a residential use site on all relevant maps.

Thank you for your time and attention. I look forward to confirmation of my submission.

Yours faithfully  
Joan McEwen



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](mailto: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 10<sup>th</sup> 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	Yeoman McAllister Architects
Address and Postcode	64 Coltbridge Avenue Edinburgh EH12 6AH
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.	H8-11	or
Chapter	<input type="text"/>	Page no. <input type="text"/> Paragraph no. <input type="text"/>

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

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

Additional land allocation for residential housing - Land east of Southfield, Abernethy.  
The area is identified as site number 025 previously considered during the site assessment.

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

Given the new school, amenity and services within Abernethy, it is considered that there is far greater demand for housing than the 132 proposed in total. Given the limited land allocation, constraints and planning policy, in reality the housing numbers may be fall significantly below what is anticipated.

Sites H8 & H9 are constrained by risk of flooding and proximity to the railway. The sites provide only limited housing numbers. The zoning of site H11 is welcomed and supported, however it is considered that site H10 and H11 will likely provide a housing shortfall to the estimated 50 units per site. This due to the local density, need for open space, proximity to railway and steep topography of site H10.

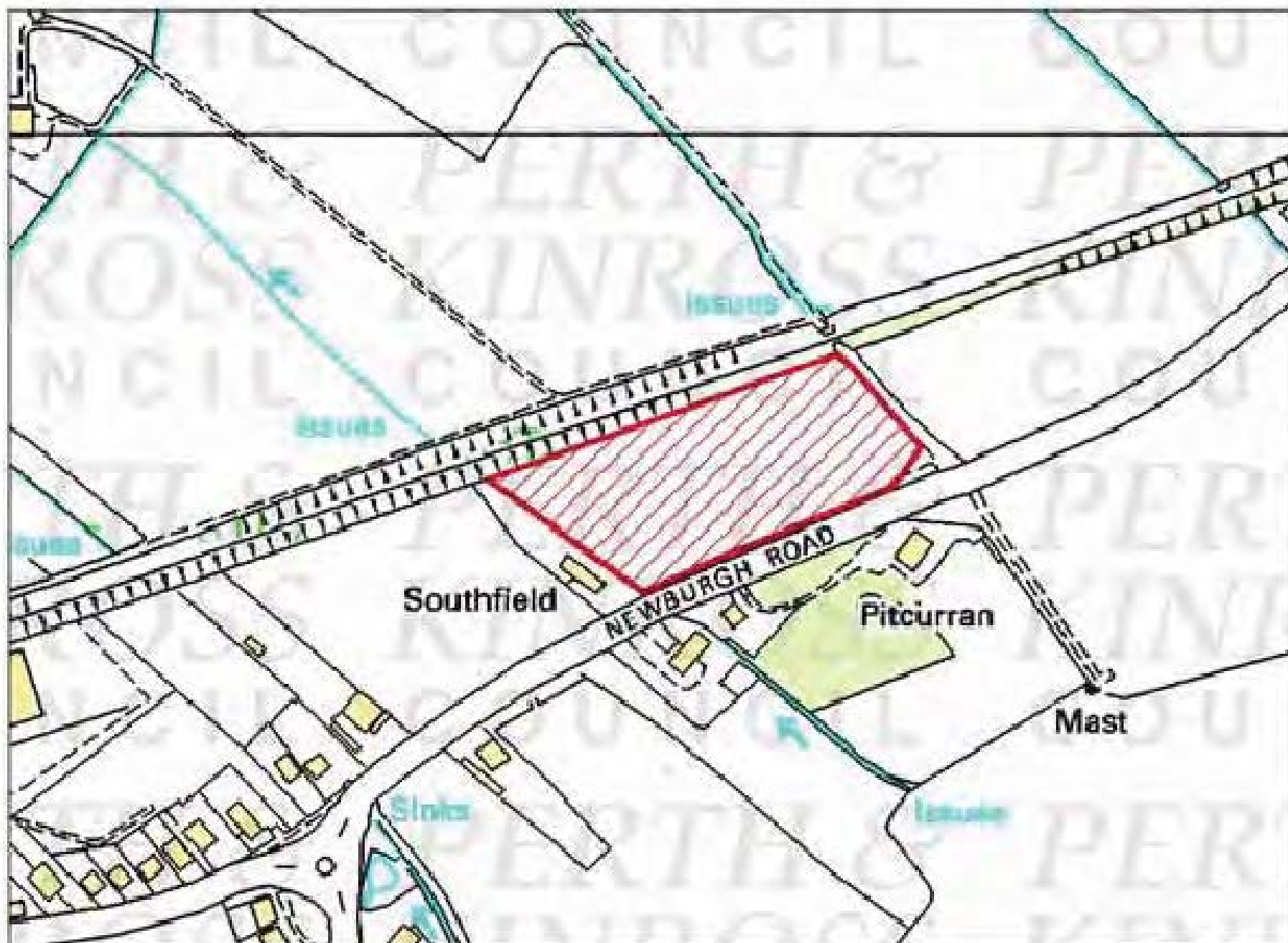
The site identified east of Southfield can accommodate a small addition of residential dwellings, easily serviced by an upgraded existing access form a natural gateway to Abernethy.

The site is not prime agricultural land and is well defined by residential housing to the south and west, railway to the east and roads to the north and west. Inclusion will in effect address and tidy-up what is currently an oddity in the settlement plan, help meet the housing shortfall in the short term (immediately) and form a natural gateway with Pitcurran House to the west of Newburgh Road.

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Scale:  
1:5,000

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](mailto:DevelopmentPlan@pkc.gov.uk)

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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	Yeoman McAllister Architects
Address and Postcode	64 Coltbridge Avenue Edinburgh EH12 6AH
Telephone no.	
Email address	

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

### 2. Which document are you making a representation on?

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

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

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

Policy ref.	<input type="text"/>	or
Site ref.	H8-11	or
Chapter	<input type="text"/>	Page no. <input type="text"/> Paragraph no. <input type="text"/>

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

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

Additional land allocation for residential housing - Land west of Midfield, Abernethy.  
The area comprises of the north portion of site number 023 previously considered during the site assessment.

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

Sites H8 & H9 are constrained by risk of flooding and proximity to the railway. The sites provide only limited housing numbers. It is considered that site H10 and H11 will likely provide a housing shortfall to the estimated 50 units per site. This due to the local density, need for open space, proximity to railway and steep topography of site H10.

Given the new school, amenity and services within Abernethy, it is considered that there is far greater demand for housing than the 132 proposed in total. Given the limited land allocation, constraints and planning policy, in reality the housing numbers may be fall significantly below what is anticipated.

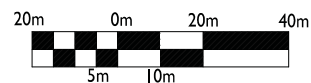
The site identified at Midfield can accommodate a small addition of residential dwellings, easily serviced by an upgraded existing access, without risk of flooding and well below the 50m contour line limit for development to the south of Abernethy.

The site is not prime agricultural land and is well defined by settlement boundaries on all three sides. Inclusion will in effect address and tidy-up what is currently an oddity in the settlement plan and help meet the housing shortfall in the short term (immediately).

Save a copy

Print

Submit



SCALE 1:1250

0	50	100
CLIENT	MR. & MRS. BETT	
JOB	Midfield, Perth Road, Abernethy	
DRAWING	Location Plan	
STATUS	PLANNING	
Drawn	M.J.K. Checked	Approved
DATE	APR 12	JOB NO. 6/3774
DR NO	Loc-01	REV /
This drawing and its data are the copyright of Yeoman McAlister Architects and must not be used for any purpose other than that for which it is intended. Yeoman McAlister accepts no responsibility for any inaccuracy in printing of this drawing by any parties.		SCALE 1:1250 SHEET SIZE A3

LONDON:-  
53 Monument Street  
London  
EC3R 8BU



## Your Details

An asterisk (\*) indicates a required field.

Your Name: *	<input type="text" value="Jim Pritchard"/>
Organisation Name:	<input type="text"/>
Agent Name:	<input type="text"/>
Address 1: *	<input type="text" value="Marwood"/>
Address 2	<input type="text"/>
Address 3	<input type="text"/>
Postcode: *	<input type="text" value="KY13 0UH"/>
Phone Number:	<input type="text"/>
Email Address: *	<input type="text" value="REDACTED"/>
Site Name:	<input type="text"/>
Contact Person:	<input checked="" type="checkbox"/> Me <input type="checkbox"/> My Agent

Your comments will be applied to the following items:

## 2 The Vision and Objectives - 2.2 The Local Development Plan Vision Statement - Paragraph 2.2.2

I agree with the proposal to concentrate development on Perth City and the Burghs.

## 2 The Vision and Objectives - 2.4 Strategy - Paragraph 2.4.5

It seems like bad planning to base assumptions about future growth on outdated (2006) figures. Not only are these figures out of date but they are inappropriate because they are underpinned by assumptions which no longer apply (high economic growth and in-migration). Populations should be revised downwards to bring them closer to reality.

## 2 The Vision and Objectives - 2.4 Strategy - Paragraph 2.4.7

The plan states, "the inherent demand for housing both in terms of need and aspirations remains largely intact."

I don't believe there is any evidence that this is the case. Please can you explain the evidence that this assertion is based upon?

## 2 The Vision and Objectives - 2.4 Strategy - Paragraph 2.4.10

I very much agree with the commitment of "lessening peoples need to travel to get to work or shop, and supporting the development of renewable and low carbon energy.

## 3 Policies - 3.3 Economic Development - Paragraph 3.3.7

I wholeheartedly agree with this. Good communications infrastructure is extremely important for enabling business to thrive. I would also call for improvements to the reliability of the electricity supply in rural areas, which currently leaves a lot to be desired (there have been frequent power outages in rural Kinross-shire).

## 3 Policies - 3.6 Transport and Accessibility - Paragraph 3.6.2

I support this.

## 3 Policies - 3.6 Transport and Accessibility - Paragraph 3.6.5

I support this policy.

## 3 Policies - 3.7 Community Facilities, Sport and Recreation - Paragraph 3.7.5

I would like to point out that the value of open space and recreational areas must not be measured simply in terms of whether "organised" sports such as Sunday league football take place on them. Recreational open space is very important and is usually used by many different groups of people (e.g. children flying kites, dog walkers etc), not just those engaged in competitive sports.

## 3 Policies - 3.10 Environmental Resources - Paragraph 3.10.5

I support this policy.

### 3 Policies - 3.10 Environmental Resources - Paragraph 3.10.6

I am very concerned about the loss of the AGLV. I would like to see equivalent measures taken to afford the same level of protection to the landscape value of Perth & Kinross in the future. The natural landscape is one of our most precious resources and must be stringently protected.

### 4 Perth and Kinross Spatial Strategy - 4.3 Local Development Plan Spatial Strategy - Paragraph 4.3.15

This makes it all the more important that we focus development on the City of Perth and the Burghs.

### 7 Kinross-shire Area Spatial Strategy - 7.1 Introduction - Paragraph 7.1.10

I support this policy.

### 7 Kinross-shire Area Spatial Strategy - 7.1 Introduction - Paragraph 7.1.13

I would have preferred the option of spreading development more evenly around the villages in Kinross-shire, rather than putting such a large proportion of them in Powmill. However, this may present an opportunity to keep the school at Blairingone open by taking students from Powmill village. I would support such a proposal.

### 7 Kinross-shire Area Spatial Strategy - 7.1 Introduction - Paragraph 7.1.16

I disagree with the proposal to extend Fossoway Primary School. The access road to the school is already unable to handle the amount of traffic that uses it at drop off and pickup times. Indeed, the road is dangerous at these times and there have recently been occasions when children have suffered "near misses" as a result of excessive traffic and narrow pavements.

### 7 Kinross-shire Area Spatial Strategy - 7.7 Crook of Devon - Paragraph 7.7.2

I support the redevelopment of the fish farm for tourism use, provided it is in keeping with the character of the village.  
I support the decision of the Council to reject development at the site of the Deer Farm on Naemoor Road, as it is currently designated as outside the village boundary.  
I think there should be no further development on the Deer Farm (as owned by GS Brown) because Crook of Devon has already been over developed and has insufficient infrastructure to support more development.

### 11 Appendix 1: List of Supplementary Guidance - 11.1 Supplementary Guidance to be consulted on at the same time as the Proposed Plan - Paragraph 11.1.1

The Housing in the Countryside Guidance presents a sensible approach to many of the issues that need to be addressed when considering development in the countryside. However, I am worried about the section concerning Building Groups (Section 1.). The part, "Consent will also be granted for houses which extend the group into definable sites" seems too vague and leaves open the possibility of development on any site to be extended to any "definable boundary" irrespective of scale. This is a loophole



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

Email: [REDACTED]  
Direct tel: [REDACTED]  
Direct fax: [REDACTED]

Your ref:  
Our ref: 06118464/CF/Let

5<sup>th</sup> April 2012

Dear Sirs

### **Perth and Kinross Local Development Plan – Proposed Plan**

On behalf of Mr Struan Robertson we would ask that the following written representations be accepted in response to the terms of the Proposed Local Development Plan.

Mr Robertson has identified specific areas of land in and around Grandtully, Strathtay and Little Ballinluig that offer clear potential for development.

DTZ previously submitted representations in response to the Main Issues Report Consultation that specifically promoted the potential development of land at the following locations:

- Land West of Strathtay (Site Ref: 769)
- Land at Little Ballinluig (Site Ref: 770)
- Land South of the River Tay (Site Ref: 771)

Supporting technical assessments that considered issues relating to Access, Utilities and Infrastructure, Flood Risk and Surface Water Management were prepared by Waterman. Perth & Kinross Council allocated these representations with the reference 0891.

We have reviewed the terms of the Proposed Local Development Plan as they affect “Highland Perthshire” and, more specifically, Grandtully, Strathtay and Little Ballinluig.

It is noted that the vast majority of new development within the Highland Area is focussed upon the principle settlements of Aberfeldy and Pitlochry with a number of smaller development allocations made in “landward area” settlements including Ballinluig, Fearnan, Kenmore, Kinlochranoch and Murthly.

**DTZ**

One Edinburgh Quay, 133  
Fountainbridge, Edinburgh, EH3 9QG



A list of directors' names is open to inspection at the above address  
DTZ Debenham Tie Leung Limited Registered in England No 2757768  
Registered office 125 Old Broad Street London EC2N 2BQ





With respect to Grandtully, Strathtay and Little Ballinluig no specific development allocations have been made by the Proposed Plan. The Proposed Plan notes that Strathtay and the majority of Grandtully are within a Conservation Area and stipulates that *“the historic character of Strathtay is to be protected from any undesirable or detrimental development”*. Accordingly, the villages are not identified for significant growth with the settlement boundary drawn to allow *“only limited further development”*.

In terms of Little Ballinluig, the settlement boundary has been extended to the west to include a site which currently has planning permission for residential development (affordable housing). With this exception the Proposed Plan makes no additional changes.

On behalf of Mr Robertson, DTZ would put on record our objection to the terms of the Proposed Local Development Plan as it affects Grandtully, Strathtay and Little Ballinluig.

The terms of our objection and the changes to the plan which our objections seek are outlined in detail by our previous representations (Ref 0891). These are updated below:

#### **Land West of Strathtay (Site 769)**

It is considered that Mr Robertson's land west of Strathtay offers a suitable and effective residential development opportunity. The land in question is bounded on 3 sides by established housing and represents the logical location for expansion of the settlement boundary.

Our previous representations relating to this site promoted an area extending to 3.9 hectares for development, the extent of which is identified by Plan 1 (Page 5). Due to topographical issues – the southern section of Mr Robertson's land ownership slopes considerably towards the River Tay – the area sought for development by these representations has been reduced. It now extends to 1.17 ha, as demonstrated by Plan 2 (Page 6). The area sought for development is flat, and is currently in low value agricultural use.

Technical assessments undertaken in respect of the site demonstrate that appropriate vehicular and pedestrian access arrangements can be achieved. Key utilities and infrastructure connections are, or can be made available to serve the site, and development would be unconstrained by issues relating to flooding, accessibility, topography, environmental protection or cultural heritage.

DTZ has previously presented detailed socio-economic evidence which provides a clear context for development at this location. The socio-economic trends we presented clearly indicate that in the absence of new allocations for affordable and family housing within Strathtay, such failure to make a appropriate provision for the village's future growth will contribute to a steady economic and social decline, condemning the village to remain unaffordable to young people who wish to settle or stay in the local area, and ultimately resulting in the loss of key local facilities and services.

The Proposed Plan makes reference to the historic character and setting of Strathtay and concludes that it must be *“protected from any undesirable or detrimental development”*. This appears to be the basis for the decision to limit possibilities for future development within Strathtay.



We strongly object to the decision to place a moratorium on development within Strathtay. Rather than being a reason for no development, the village's character and setting provides a basis for appropriate high quality development.

Any future development of this site would be specifically designed to be in keeping with the established character of the settlement taking full account of the area's conservation area status. Indeed, the fact that Strathtay is a conservation area would ensure that this would be the case.

For the reasons outlined above, and within the detailed submissions previously made, these representations seek formal amendments to the Proposed Local Development Plan. It is considered that Mr Robertson's site to the West of Strathtay (as amended) should be identified as a housing development opportunity, with the associated settlement boundary extended to include this land. To reflect this, the wording of paragraph 6.15.2 within the Proposed Plan should be appropriately amended.

### **Land at Little Ballinluig (Site 770)**

It is considered that Mr Robertson's land at Little Ballinluig offers a suitable and effective development opportunity. The land immediately to the east of the site benefits from planning consent for residential development and the land immediately opposite the western section of the site has been recently developed for housing.

The site extends to around 1.5 hectares, as highlighted by Plan 3 (Page 7), is generally flat and is currently in use as grazing land.

Technical assessments undertaken in respect of the site demonstrate that appropriate vehicular and pedestrian access arrangements can be achieved. Key utilities and infrastructure connections are, or can be made available to serve the site, and development would be unconstrained by issues relating to flooding, accessibility, topography, environmental protection or cultural heritage.

The western section of the site in particular represents a prime development opportunity. This area extends to 0.34ha and is highlighted by Plan 4 (Page 8). Immediately opposite this section of the site recent housing development has taken place and this is due to be extended following Perth & Kinross Council's decision to grant planning permission for 11 Affordable Housing units (Ref: 06/00870/FUL) and the proposal to extend Little Ballinluig's settlement boundary to reflect this.

Technical evidence presented in support of this site has demonstrated its effectiveness for development. It is therefore entirely appropriate that the Local Development Plan should make provision for a small number of low density houses at this location. Such an extension to the settlement boundary, to incorporate Mr Robertson's land, would be entirely in keeping with spatial strategy considerations, even more so given that this land does not fall within the wider conservation area boundary.

Given the nature of the existing housing development immediately opposite the site, and the relatively high density development that is likely to take place at 'Oakwood Field' as a result of Planning Permission 06/00870/FUL we would contend that allocation of this site for housing development would assist in accommodating the needs of various market sectors.





For the reasons outlined above, and within the detailed submissions previously made, these representations seek formal amendments to the Proposed Local Development Plan. It is considered that Mr Robertson's land at Little Ballinluig should be identified as a housing development opportunity, with the associated settlement boundary extended to include this land. To reflect this, the wording of paragraph 6.15.2 within the Proposed Plan should be appropriately amended.

In the event that the entirety of the site is not considered appropriate for allocation within the Plan, we would ask that the western section of the site which extends to 0.34 ha be specifically allocated for housing development or, at the very least, included within Little Ballinluig's settlement boundary in order to allow 'windfall' development opportunities to come forward during the lifetime of the Local Development Plan.

### **Land South of the River Tay (Site 771)**

On behalf of Mr Robertson we previously submitted representations that sought the identification of this land as a development opportunity either for residential or tourist related use (e.g. fisherman's lodges).

Following reference to the terms of the Proposed Local Development Plan and the existence of two significantly superior candidate residential sites within my client's ownership in the locality (Sites 769 and 770) it is now accepted that this site does not represent an appropriate housing development opportunity. This is due primarily to the issue of flood risk affecting the site.

Previous discussions between my client and Perth and Kinross Council have related to the potential this land offers for some form of tourist related development. It is considered that this land represents an opportunity to enhance Pitcastle Estate's sporting offer, for example via the development of "fisherman's lodges".

We would ask that this site be considered on this basis with appropriate recognition contained within section 6.15 of the Local Development Plan.

### **Summary**

There is a critical requirement for a new housing development within Grantully, Strathtay and Little Ballinluig in order to sustain these rural settlements and assist in accommodating the needs of various sectors of the market.

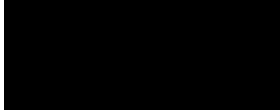
The Local Development Plan must make appropriate provision for development within these settlements and the sites subject to this representation provide, by virtue of their location, scale and character the ideal solution to this requirement. Detailed technical evidence has previously been presented in support of these sites which we would ask that you take account of at this time.

In conclusion we would reiterate our objection to the terms of the Proposed Local Development Plan, and formally request that Mr Robertson's land West of Strathtay (Site 769) and his land at Little Ballinluig (Site 700) be identified as suitable for housing development – either by specific housing allocations or appropriate extensions to the settlement boundary. With regard to Mr Robertson's Land South of the River Tay this representation seeks appropriate provision within the Local Development Plan in support of its future development for tourist related development.



We trust that the terms of these representations are clear. We look forward to receiving confirmation of safe and timely receipt.

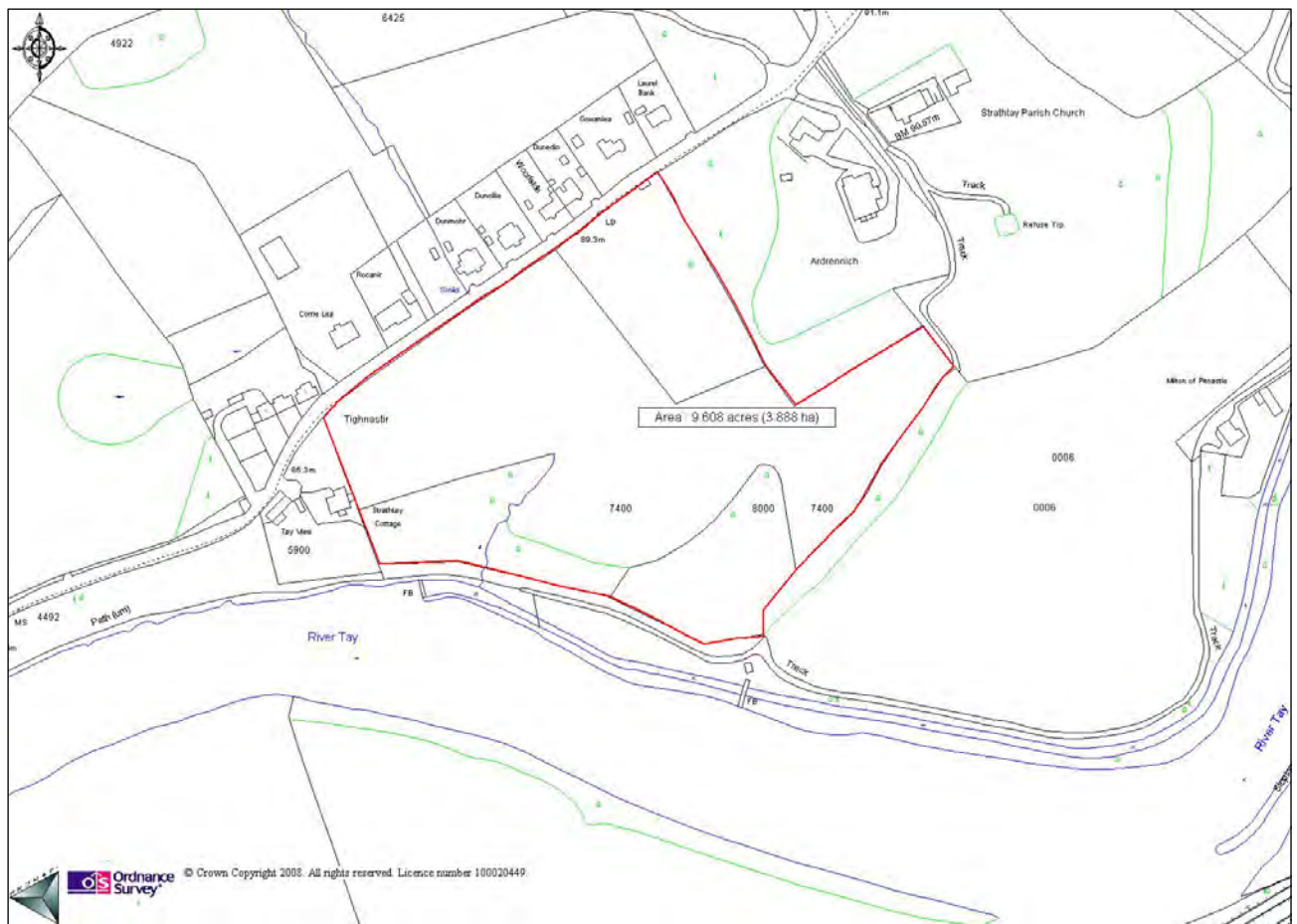
Yours faithfully



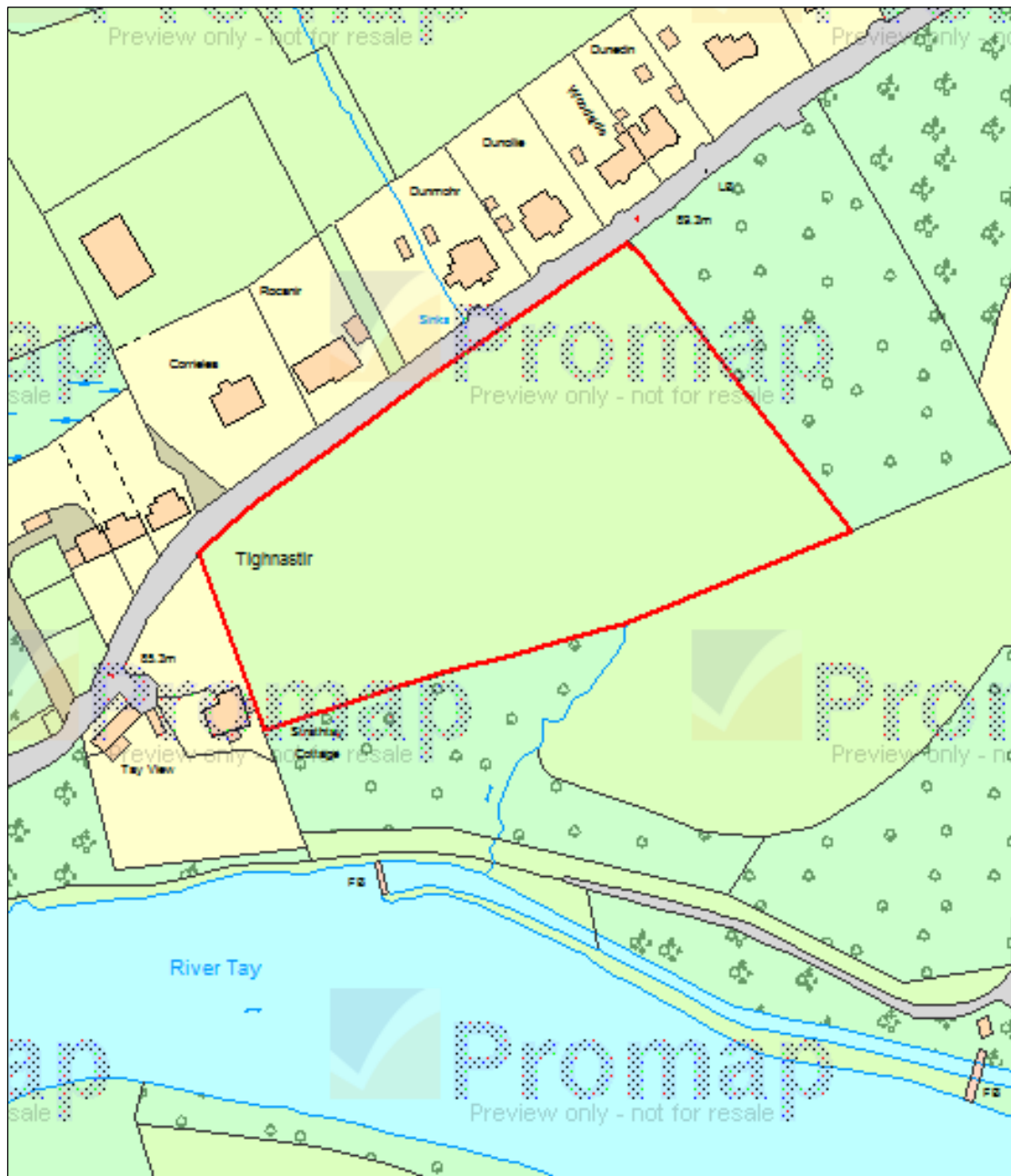
**Callum Fraser**  
**Associate Director**



## 1. Land West of Strathtay (Site Ref 769)

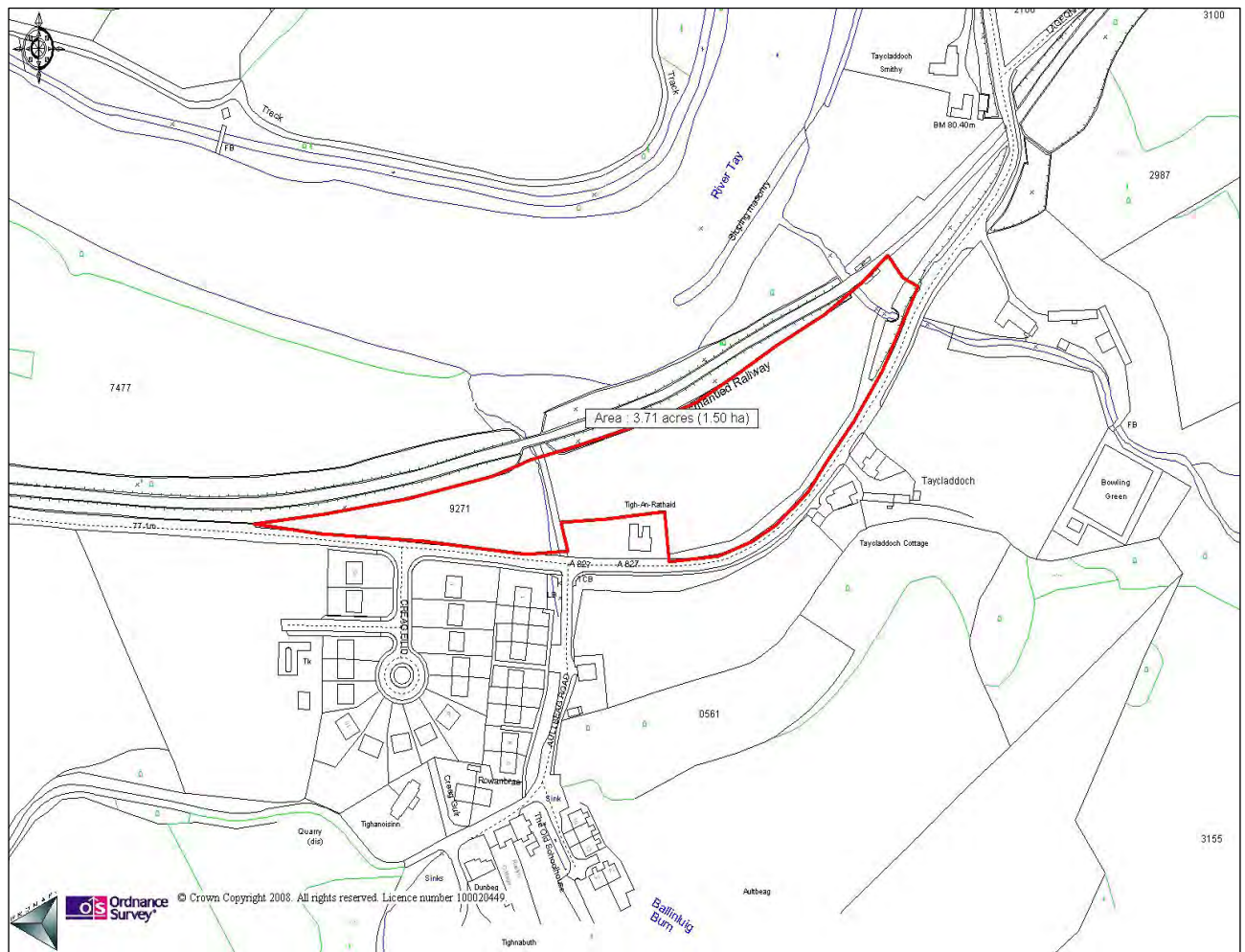


## 2. Land West of Strathtay (Amended)



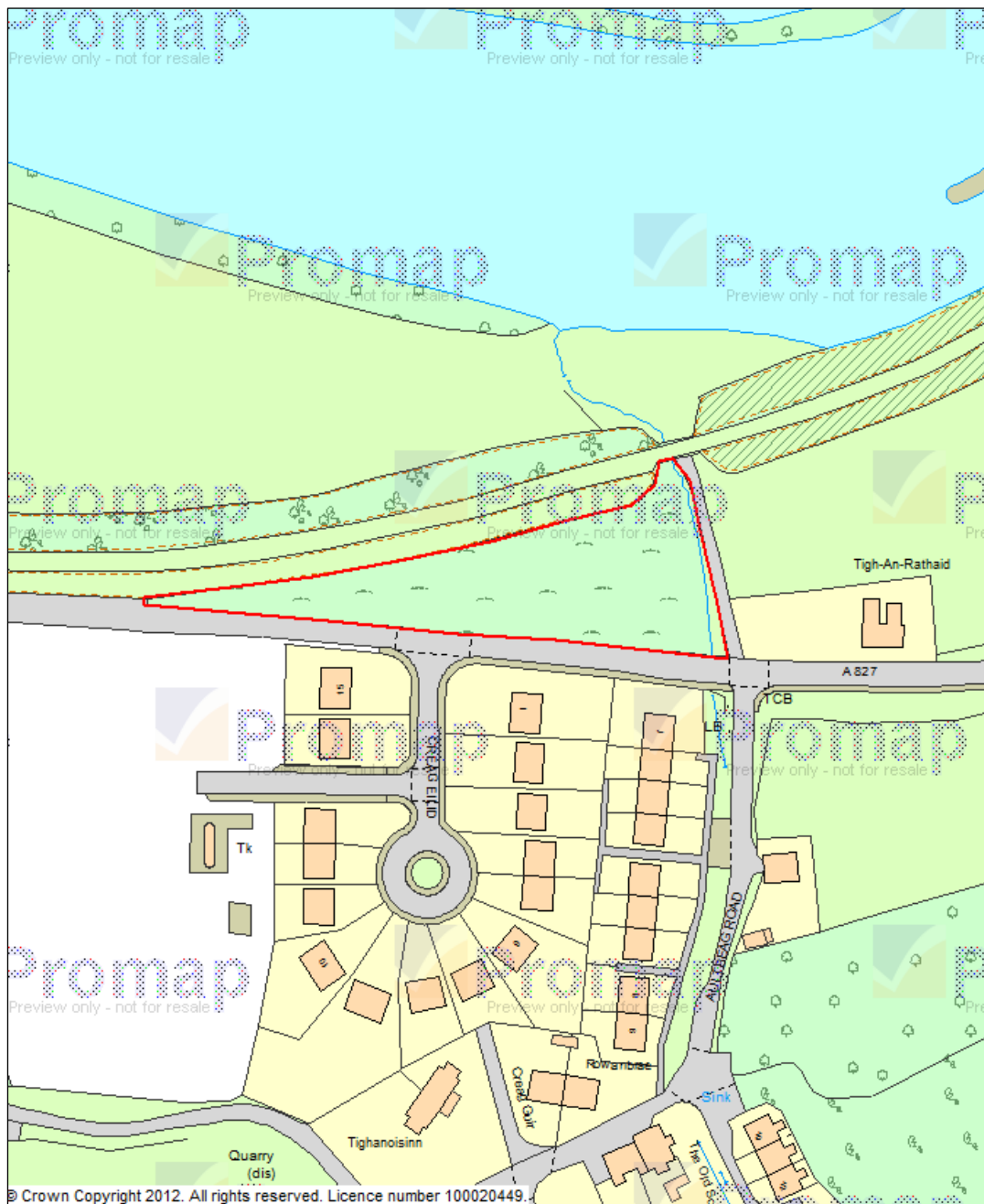


### 3. Land at Little Ballinluig (Site Ref 770)





## 4. Land at Little Ballinluig (Amended)







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

Email: [REDACTED]  
Direct tel: [REDACTED]  
Direct fax: [REDACTED]

Your ref:  
Our ref: 110LFG00/CF/Let

5<sup>th</sup> April 2012

Dear Sirs

### Perth and Kinross Local Development Plan – Proposed Plan

On behalf of Monzie Estate we would ask that the following written representations be accepted in response to the terms of the Proposed Local Development Plan.

Monzie Estate has identified specific areas of land in and around Gilmerton that offer clear potential for residential development

DTZ previously submitted representations in response to the Main Issues Report Consultation that specifically promoted the potential development of land at the following locations:

- Land North of Grahame Terrace (Site ref: 451)
- Land South of A85 (Site ref: 455)
- Land at North Gilmerton (Site ref: 452)

Perth and Kinross Council allocated these representations with the reference 0869.

We have reviewed the terms of the Proposed Local Development Plan as they affect the “Strathearn Area” and, more specifically, Gilmerton.

Monzie Estate notes that in seeking to meet the housing land requirement the Proposed Local Development Plan concentrates the majority of development within the principle settlements of Crieff and Auchterarder. On the basis that Auchterarder has a significant supply of effective housing land which is deemed more than adequate to meet demand until beyond the plan period the majority of the required residential development sites are identified in Crieff.

Outwith the main settlements the Proposed Plan makes only one housing allocation within the “landward area” – 30 units on land at Cowden Road, Comrie (site H58).

In terms of Gilmerton the Proposed Plan does not make specific provision for its growth during the plan period however the settlement boundary has been drawn to accommodate limited further development.

**DTZ**

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A list of directors' names is open to inspection at the above address  
DTZ Debenham Tie Leung Limited Registered in England No 2757768  
Registered office 125 Old Broad Street London EC2N 2BQ





In response to the above provisions, on behalf of Monzie Estate, we would ask that the following comments be noted and amendments made to the plan where requested:

#### **Land North of Grahame Terrace (Site 451)**

The land in question extends to 1.72 acres (0.7 hectares) and is currently in use as grazing land. The extent of the site is highlighted by Plan 1 (page 5).

The adopted Strathearn Local Plan (2001) allocates the site for housing development and notes capacity for 10 housing units. The site has not come forward for development during the period of the current plan, however this can be attributed to the current economic downturn and resulting lack of active marketing by the landowner.

Monzie Estate notes that this site has been included within the revised settlement boundary for Gilmerton. This provision of the Proposed Local Development plan is welcomed on the basis that the principle of development within settlement boundaries is supported by policy (subject to compliance with detailed matters).

Nevertheless as Gilmerton is not constrained by issues such as flooding, accessibility, topography, environmental protection or cultural heritage, and the site in question is effective and entirely suitable for development (as demonstrated by its allocation within the adopted Strathearn area local plan). As such this representation requests its specific allocation for residential development.

We consider the site to be suitable for the development of up to 10 main stream housing units, capable of being brought forward for development within the Plan period.

For the reasons outlined, and within the detailed submissions previously made, these representations seek a formal amendment to the Proposed Local Development Plan. Monzie Estate's land situated to the North of Grahame Terrace (Site 451) should be specifically identified as a housing development opportunity. To reflect this, the wording of paragraph 8.10.2 within the Proposed Plan should be appropriately amended.

#### **Land South of A85 (Site 455)**

The site in question extends to 1.65 ha and is currently in use as grazing land. It is located at lower level than the A85 immediately adjacent to, but outwith, Gilmerton's settlement boundary. The extent of the site is identified by Plan 2 (page 6).

We consider the site offers clear potential for residential development. The site benefits from an established point of access taken from the A85 and Monzie Estate has previously undertaken key infrastructure/utility assessments – including drainage, water and power supply. These demonstrate that the settlement of Gilmerton is unencumbered by infrastructural constraints.

The site could reasonably be described as consisting of two clear parts – the northern section which bounds the A85, and the eastern section which effectively bounds the established access to the Cultoquhey House Hotel. It is considered that the northern section of the site in particular represents a prime residential development opportunity.



Monzie Estate objects to this site's omission from the Proposed Local Development Plan and, for the reasons stated, requests that the northern section of the site be specifically allocated for housing development within the emerging local development plan. Alternatively it is considered that Gilmerton's settlement boundary should be extended to include this land in order to allow possible windfall development opportunities during the lifetime of the plan. To reflect this, the wording of paragraph 8.10.2 within the Proposed Plan should be appropriately amended.

In the event that the entirety of the site is not considered suitable for development as an alternative the identification of the northern section of the site – which extends to 1.9 acres and is identified on Plan 3 (page 7) – as a housing development opportunity is considered entirely appropriate in respect of spatial strategy considerations and would provide the settlement with a logical and defensible settlement boundary.

Future development of the site, potentially comprising up to five residential units, would be designed to fully integrate with the village of Gilmerton and fit harmoniously into the local landscape. For these reasons the site presents an excellent residential development opportunity.

### **Land at North Gilmerton (Site 452)**

Regarding the land to the north of Gilmerton, this is a large site located immediately adjoining the identified settlement boundary of Gilmerton. The full extent of the site is identified by Plan 4 (page 8).

We consider this site offers clear potential for development both during the current plan period and beyond. Access to the site can be achieved from two possible locations with primary access envisaged as being achieved from the A822. Monzie Estate has previously undertaken key infrastructure/utility assessments – including drainage, water and power supply. These clearly demonstrate that the settlement of Gilmerton is unencumbered by infrastructural constraints.

In response to previous representations made by Monzie Estate the site's topography has been raised as a possible barrier to development, in addition previous responses have suggested that the site forms an important element of Gilmerton's setting. In this respect Monzie Estate would state that a previously undertaken landscape and visual assessment concluded that any visual intrusion resulting from development would be minimal.

Concerns regarding the scale of the site have also previously been raised. In this respect Monzie Estate would accept that, when compared to the existing settlement size, releasing the entirety of the site for development during the current plan period would be out of context. Nevertheless, it is considered that the southern section of the site, which extends to 1.7ha and is highlighted on Plan 5 (page 9), offers a suitable and effective residential opportunity the development of which would be entirely appropriate in respect of spatial strategy considerations and would provide the settlement with a logical and defensible extended settlement boundary.

Monzie Estate objects to this site's omission from the Proposed Local Development Plan and, for the reasons stated, would request that the southern section of the site be specifically allocated for housing development by the Local Development Plan. Alternatively it is considered that Gilmerton's settlement boundary should be extended to include this land in order to allow possible windfall development opportunities during the lifetime of the plan. To reflect this, the wording of paragraph 8.10.2 within the Proposed Plan should be appropriately amended.

**A822 Gilmerton (Site 453)**

Monzie Estate notes and welcomes the inclusion of this 0.16ha site within the proposed settlement boundary for Gilmerton. This site is identified by Plan 6 (page 10).

Perth & Kinross Council's previous comments in respect of this site, namely that the *"development of a single house would fit into the settlement pattern of individual houses to the east and south"* and its inclusion would *"form a defensible settlement boundary"* are entirely endorsed by Monzie Estate.

We would therefore take this opportunity to state our strong support for this sites inclusion within Gilmerton's settlement boundary as defined by the Proposed Local Development Plan.

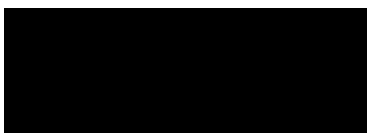
**Summary**

There is a critical requirement for new housing development within Gilmerton. Since the early 1980's only two additional private homes have been constructed in the village. This lack of development has created a demographic imbalance, with a significant proportion of village inhabitants now of retirement age. This imbalance cannot be addressed without new investment, specifically the provision of additional housing within the village.

It is considered that the Local Development Plan must make appropriate provision for development within Gilmerton and the sites subject to this representation provide, by virtue of their location, scale and character the ideal solution to this requirement.

We trust that the terms of these representations are clear and look forward to receiving confirmation of safe and timely receipt.

Yours faithfully

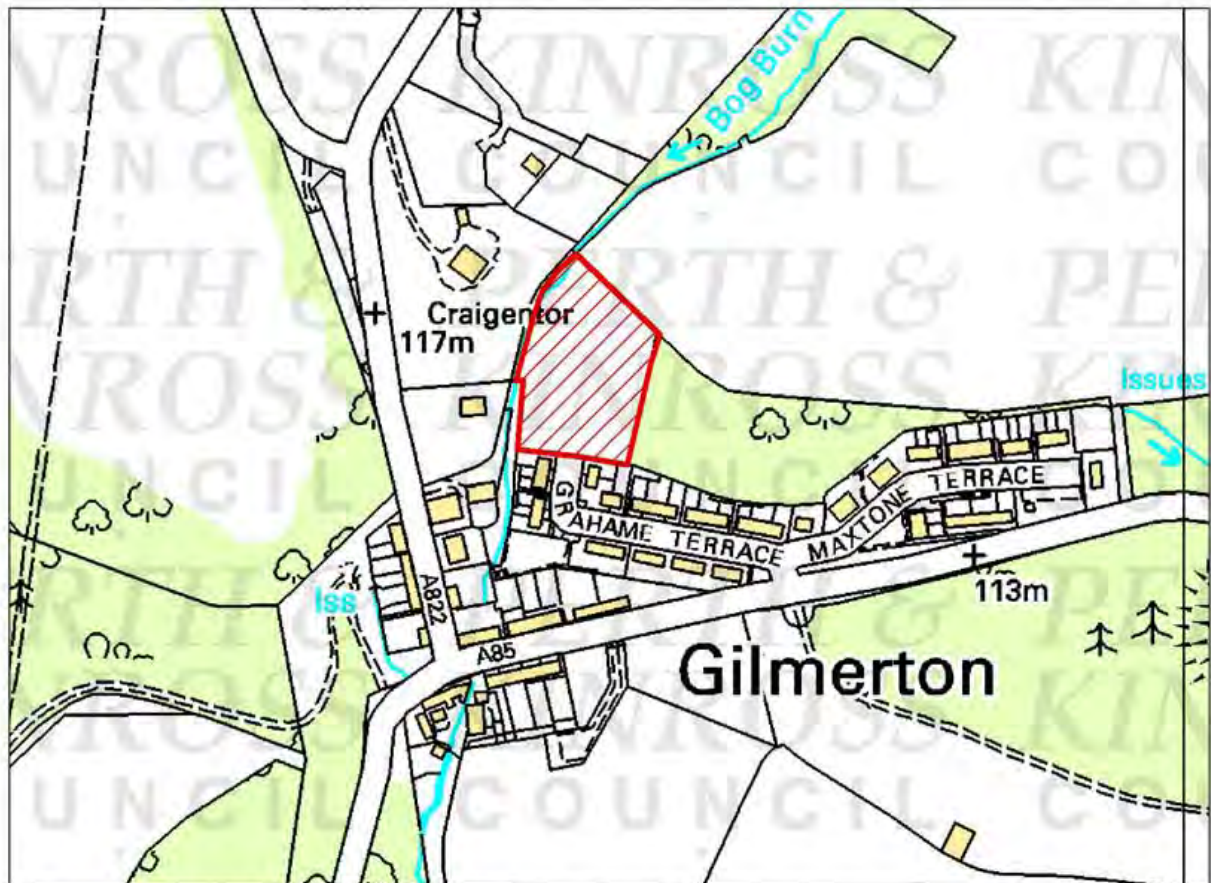


**Callum Fraser**  
**Associate Director**

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## 1. Land North of Grahame Terrace



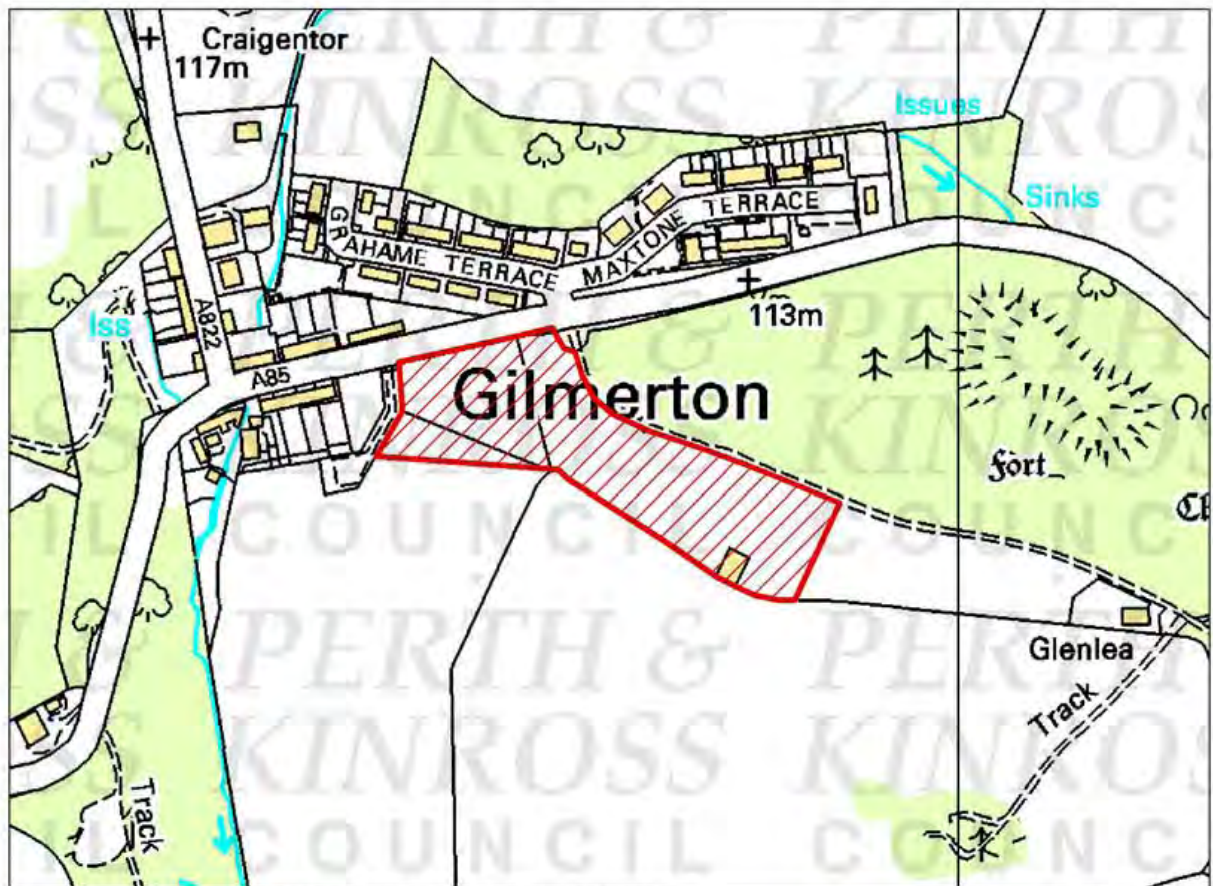
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## 2. Land South of A85



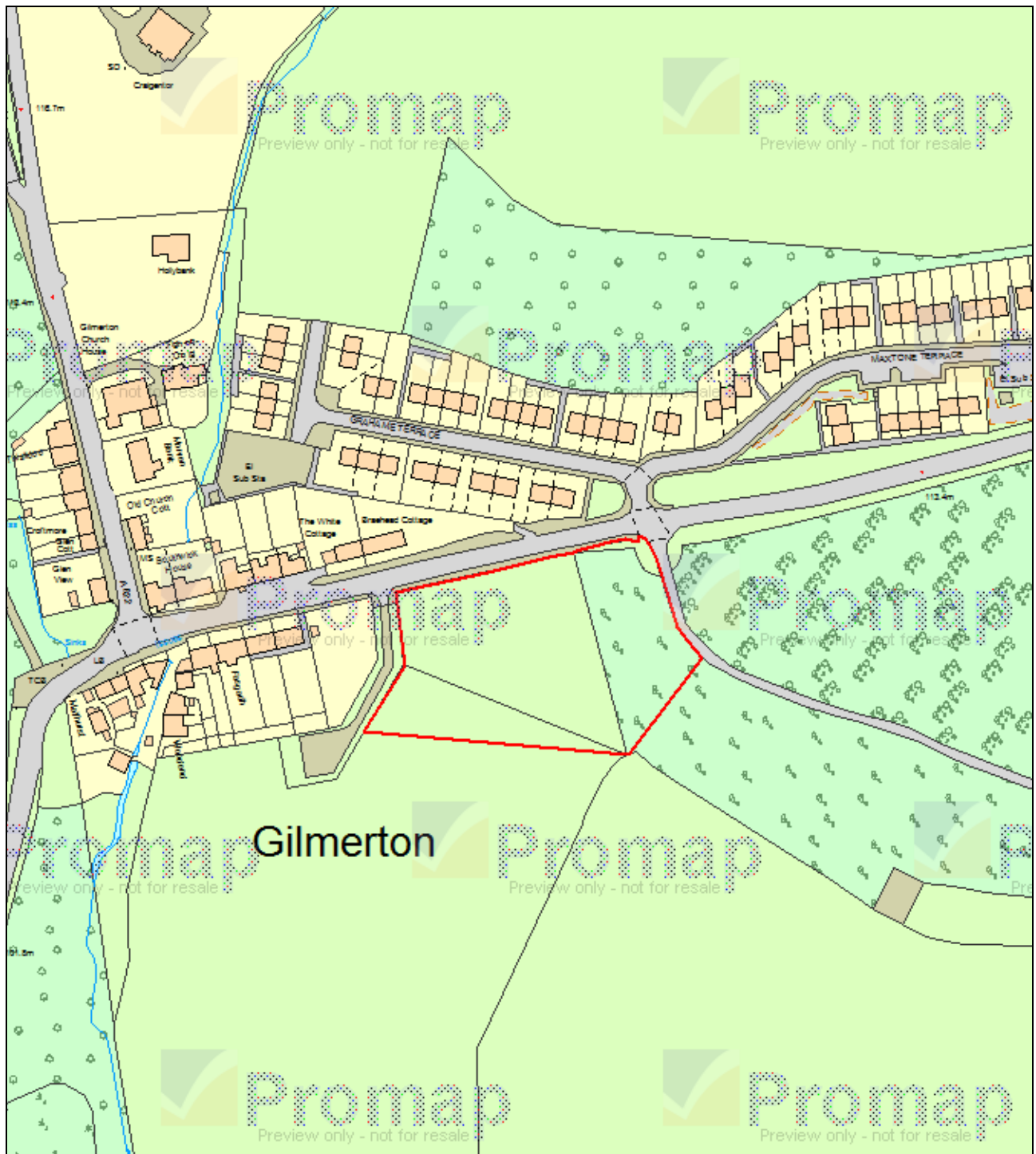
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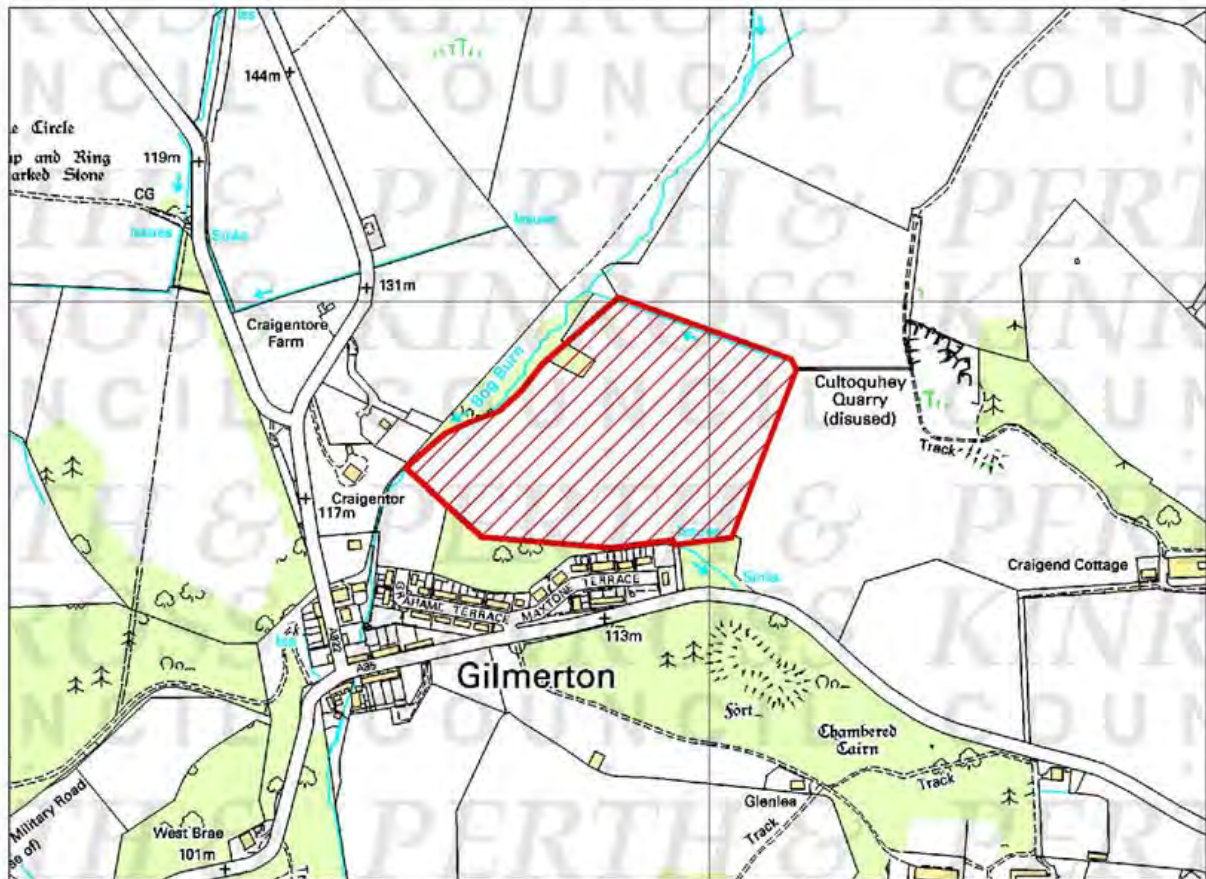


### 3. Land South of A85 (amended)





#### 4. Land North of Gilmerton



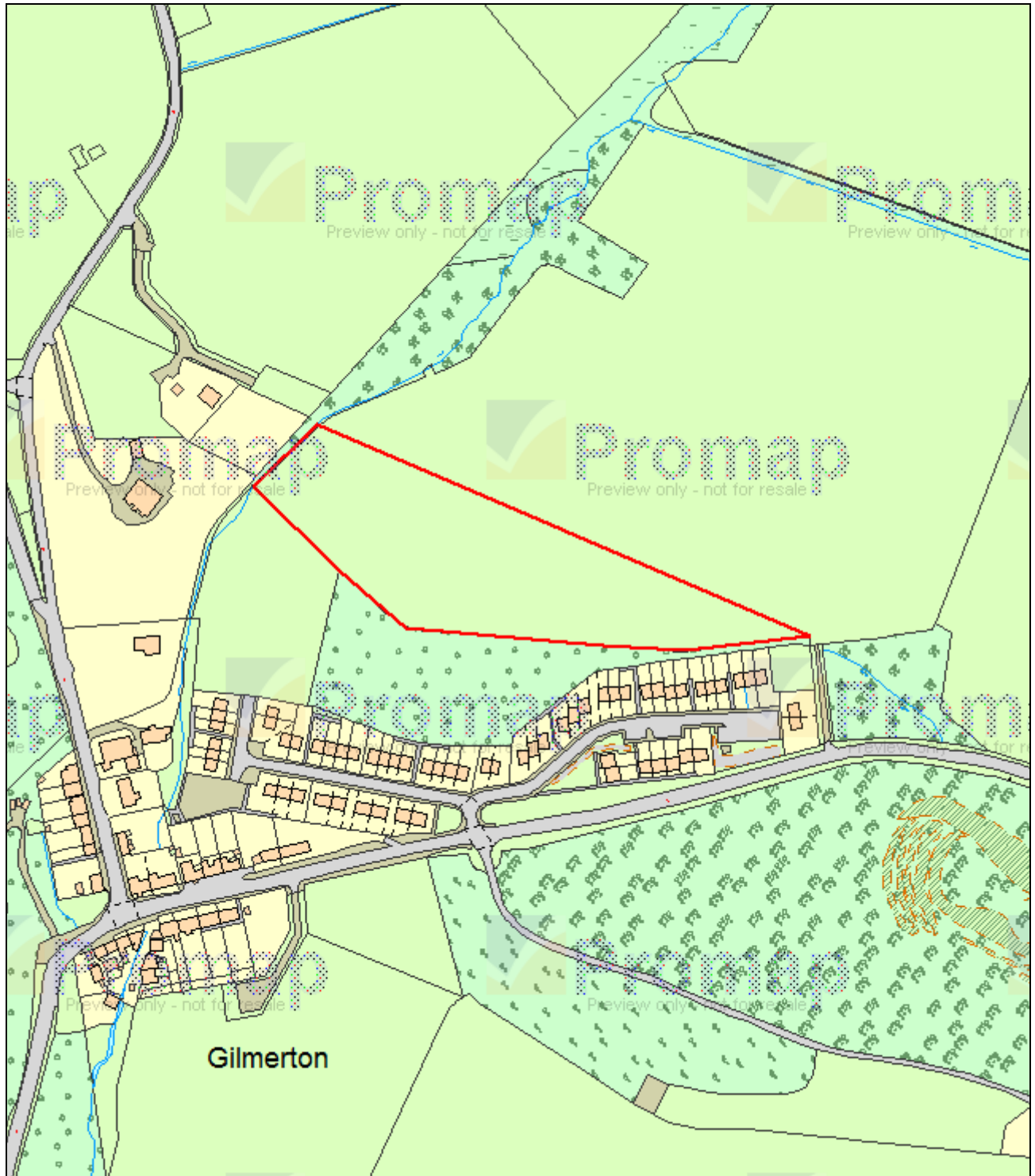
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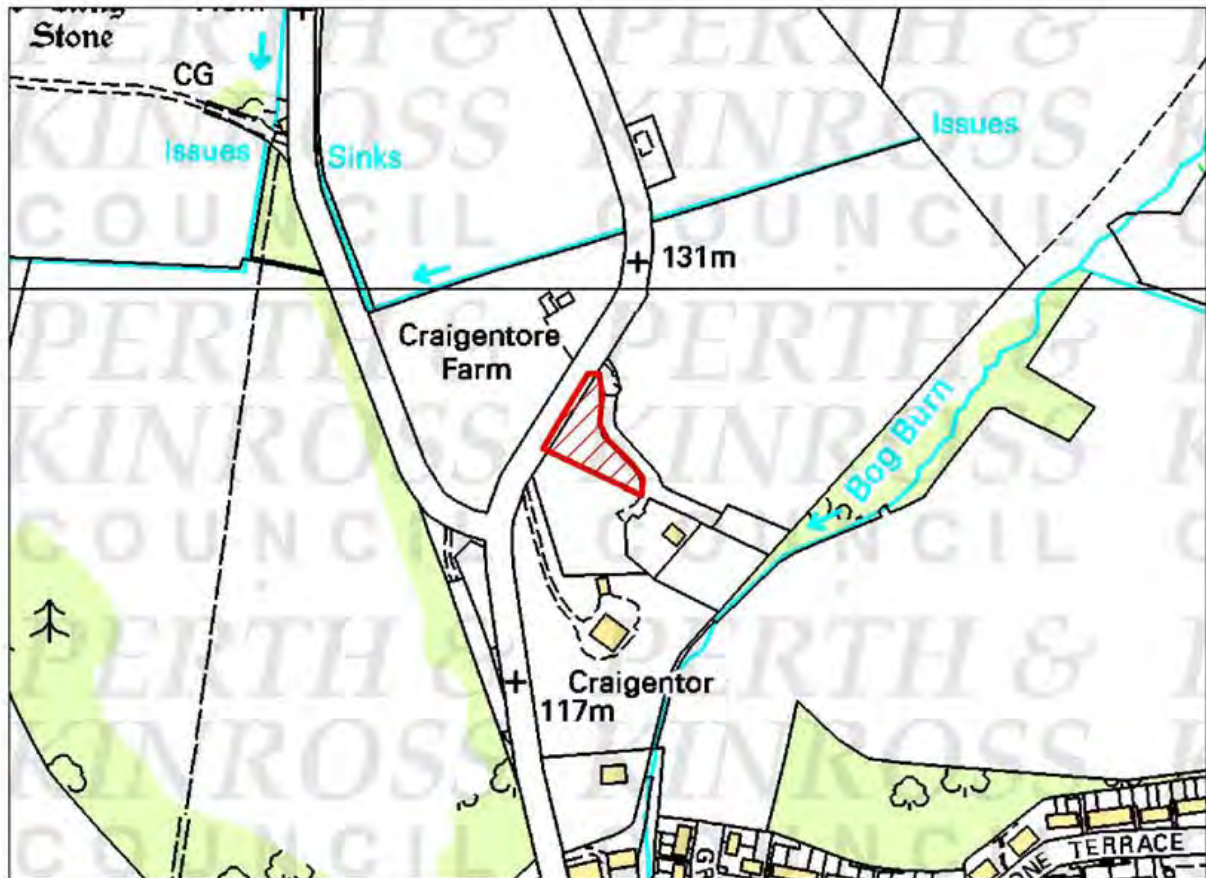
## 5. Land North of Gilmerton (amended)







## 6. A822 Gilmerton



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