

GS/168/IK

PERTH LDP SUBMISSION

DB Schenker

Muirton Yards, Tulloch, Perth

SUBMISSION

Submission in respect of the Perth and Kinross Local Development Plan

Lodged on behalf of DBSchenker


5thth April 2012 – By Email only

Ian Kelly MRTPI

Head of Planning, Graham and Sibbald, Perth



Summary

1. This submission relates to the proposed allocation of site H4, Marshalling Yards, Tulloch, Perth in the proposed Local Development Plan.
2. The submission is lodged on behalf of DB Schenker, the owners of the site. However, all contact in relation to the submission should be made via the Agent – Ian Kelly, Head of Planning, Graham and Sibbald, 3 Charlotte Street, Perth PH1 5LW (email: )
3. The submission supports the principle of the proposed allocation of the site but seeks a number of changes to the detailed provisions for the site to reflect the challenging economics that will apply to such a brownfield site being brought forward for development in challenging economic circumstances.

Introduction

4. This submission, in response to the statutory public consultation in respect of the proposed plan for the Perth and Kinross Local Development Plan has been lodged on behalf of DB Schenker, the owners of the Muirton Yard site in Perth (referred to as the Tulloch Marshalling Yards in the proposed Local Development Plan). The response has been submitted in this report and appendix format in order to properly reference the long and positive history of dialogue with the Council and to reflect the outcomes of the considerable number of studies that have already been funded in relation to the development of the site.
5. The submission sets out a summary of the previous submissions and studies, a response to the proposed allocation of the site, and a clear statement of how the site owners would prefer to see the site allocated within the Adopted Local Development Plan.
6. Notwithstanding the terms of this submission, which basically seek to adjust the allocation of the site, DB Schenker strongly welcomes the continuing support of the Council for the redevelopment of this key brownfield site as exemplified, most recently, by the proposed allocation in the version of the Local Development Plan that has been the subject of public consultation. Because the principle of the development of this key site is supported by the Council, and because the areas of concern relate to the detail of the approach to the redevelopment of the site, it was not considered that an outright objection would have been warranted in any way. Therefore, it was decided that a detailed submission should be made. It is hoped that there can be a dialogue with the Council to reach an agreed position such that this site does not need to be referred to the subsequent Local Development Plan Examination as a matter that remains in dispute.
7. There is no doubt that this site is a well located site whose redevelopment should attract strong planning policy support. However, the combination of the condition of the site arising from its historic uses, the necessary infrastructure upgrades and the current depressed property market (which is likely to persist for several years) means that a financially pragmatic and realistic approach will be needed if the site is to secure development. The consideration of planning gain will need to have particular regard to this requested pragmatic and realistic financial approach.

Previous Submissions and Studies

8. A number of previous planning submissions have been made to the Council, stretching back to the consultation on the subsequently abandoned Perth Area Local Plan. Related productive meetings were also held with a grouping of Council Officers.
9. During 2008 an extensive range of studies were carried out in respect of the site. These studies comprised a preliminary environmental appraisal, a transport assessment, a geochemical ground investigation and report, and a drainage appraisal. In addition a topographical survey was undertaken of the site. These studies have previously been supplied to the Council in electronic and hard copy. However, in order to bring them into consideration as part of the Local Development Plan process, they have been summarised in an appendix to this submission.
10. The various studies were completed by the end of 2008 and, at that stage, it had been intended to continue to undertake a twin track approach of looking to secure an appropriate Local Plan allocation whilst, at the same time, progressing an outline planning application (now an application in principle) accompanied by a conceptual masterplan for the site. However, with the onset of the difficult development market conditions from late 2008 onwards it was decided not to bring the site forward at that stage but, rather, to await the preparation of the new Local Development Plan.
11. It is now anticipated that the site will be brought forward for development in late 2013 with a view to development commencing on site in 2014.

Response to the Proposed Allocation of the Site and Related Policy Issues

12. In responding to the proposed plan for the Perth Local Development Plan (LDP) it is necessary to consider both the specific allocation of the Muirton Yards site and the general policies that might also be applied to that site.
13. The site is allocated under a heading of Mixed Use Sites (H4) in the proposed LDP. As mixed uses are no longer proposed for the Yards site it is suggested that the designation as “Housing Site” would be more appropriate. With the final post Council edits to the LDP in January 2012, it is no longer clear if the Muirton Yards site is to be a site that contributes towards the required 7 years housing land supply or not. As it is considered likely that the site will commence development in 2014 and be fully built out by 2024 this anticipated development programme, and contribution to the housing land supply, should be clearly allowed for in the LDP.
14. It is not considered appropriate, at this stage, to set a defined or fixed limit on the number of houses for the site. It is appreciated that the Council will wish to use notional housing numbers for sites as a means of ensuring that there is an appropriate, effective land supply in terms of the requirements within housing market areas. However, the number of units that can be developed on the Yards site will be controlled by the masterplanning process, taking account of ground conditions, infrastructure and access, as well as by placemaking considerations. At this stage a figure of 300 units could be seen as a further constraint. It is considered that there should be no number of units limitation on the site at this stage. If, however, for wider planning reasons the Council felt that some notional capacity figure was required then a figure of “up to 350 units” would be more appropriate.
15. The proposed LDP entry for site H4 contains a number site specific developer requirements and these are briefly commented on below using the same order as in the proposed LDP:
- a. Masterplan – accepted with the proviso that this is likely to be a two stage process of an overall conceptual masterplan for the whole site followed by more detailed masterplans for individual phases or groups of phases
 - b. Flood Risk Assessment – accepted, but with the proviso that there might be strategic flood defence works that will have been paid for by the Council and

that will have a beneficial effect on this site. The suggested wording below reflect this

- c. Strategic approach to development flooding and discharge issues on the Lade – accepted
- d. Improved access from Tulloch Road/Crieff Road – accepted, and this can be based on the designs that were submitted alongside the earlier TA, but improvements can only be delivered on land within the roads boundary
- e. Vehicular access to Auld Bond Road – it is accepted that enhanced access arrangements are needed in order to deliver the full capacity of the site. It is also accepted that the submitted TA assessed this potential additional access. However, at the moment consideration is being given to a number of additional access options, and therefore, a suggested more generalised requirement is set out below
- f. Links to Lade green corridor – accepted
- g. Enhancement of biodiversity – accepted
- h. Wider paths links – accepted
- i. White Bridge contributions – the principal of this is understood and accepted. However, as set out below, the development economics of this site are challenging and there is unlikely to be insufficient funds to pay for all of the required planning gain items. Therefore, a site specific approach is set out in the suggested wording in the following section of this submission
- j. Contaminated land strategy – accepted and this can be based on an update of the study which is summarised in the appendix to this submission
- k. Education contribution – the principle of this is understood and accepted. However, as with the White Bridge aspect a site specific approach to planning gain is suggested for this site having regard to the challenging development economics

16. The proposed LDP contains a number of policies (and related proposed Supplementary Guidance) that could affect both the masterplanning and the development economics of the Muirton Yards site. These policies include:
- a. PM1 Placemaking
 - b. PM2 Design Statements
 - c. PM3 Infrastructure Contributions (including Education contributions)
 - d. RD4 Affordable Housing
 - e. TA1 Transport Standards and Accessibility Requirements
 - f. CF1 Open Space Retention and Provision
 - g. NE6 Perth Lade Green CorridorEP1 Climate Change
 - h. EP2 New Development and Flooding
 - i. EP12 Contaminated Land
17. A number of these requirements are also contained within the site specific requirements for site H4 and therefore the general principle of these policies is not disputed. This position applies to the need for masterplanning, design statements, enhanced access and links to the Lade.
18. Nonetheless, there are a number of these policies that are, in effect, requirements for planning gain contributions of some sort or another. It is not the intention of DB Schenker to set out a critique of each of these proposed policies as it is recognised that many of them are simply following Government guidance or current established planning practice. In the approach to the redevelopment of large urban sites it is accepted that, to a reasonable degree, infrastructure and other planning requirements must be addressed. Finally, the basic position of the Council, as expressed in the proposed LDP allocation, is to support the residential redevelopment of this site. Therefore, having regard to the above, it is considered that it would be counterproductive to seek to object to these policy provisions.
19. However, the Muirton Yards site is brownfield, it is contaminated, its' access requires upgrading, new services are required, some rail infrastructure requires to be relocated,

and some upfilling might be necessary. These are all significant abnormal site development costs. These costs could easily amount to around £4.5m of abnormal development costs. Securing a new additional access to provide for the full development of the site could easily add another £0.5m of construction and land costs to this. Current residential development land of this type in a central Perth location would probably yield around £25k a plot for private plots and £8k per plot for social/affordable homes delivered by a Housing Association. That would give an eventual capital price of around £6.5m although that would only be secured in tranches as phases were released and developed. That means, in very broad terms and using the headline figures, that there would only be £1.5m to cover the extended development time finance costs, planning gain and the landowner's profit. Therefore, it can be seen that a planning gain requirement that did not fully take into account the particular, unusual development costs that apply to this site would have the potential to inhibit the bringing forward of this key brownfield site for development.

20. As stated, it is considered that it would be counterproductive to seek to object to all of the above proposed policies. Rather, it is suggested that the more appropriate way to proceed would be to adjust the site specific developer requirements so that a clear site specific policy reference is made to the need to adjust the planning gain aspects so that they are directly related to the site development economics. That approach is incorporated into the following section of the submission.

Preferred Allocation in the Local Development Plan

21. The principle of the proposed allocation of the H4 site is welcomed and fully supported. However, having regard to all of the above, a modified allocation description for the inclusion of H4 in the Local Development Plan is requested. It is suggested that the description should be as below:

Housing Site: H4 Muirton Marshalling Yards, Tulloch, 10.6ha

Site Specific Requirements:

- A conceptual masterplan will be required setting out the proposed phasing for the release of land from 2014 onwards
- Subsequent planning applications for the development of phases of the site will require to be accompanied by a detailed masterplan that dovetails with the conceptual masterplan
- Flood Risk Assessment, taking into account any strategic actions funded by the Council in respect of the Lade, to define permanently protected open space/flood plain next to the Lade
- Improved access from Tulloch Road/Crieff Road using the existing defined public roads areas and as set out in the reports previously submitted to the Council
- The final number of house units and the final phasing of land release should be determined by subsequent detailed masterplanning giving full regard to site constraints, unit layout and design, infrastructure and enhanced access arrangements, all to be approved by the Council
- Links to the Lade green corridor including enhancement of biodiversity and habitats with reference to the Lade Management Plan
- The conceptual masterplan to identify the linkage of paths within the site to the wider path network, including core paths
- The updating of the previous contaminated land investigations together with a phased programme of appropriate remediation works
- A financial appraisal for the proposed development, taking into account the decontamination and servicing costs, that will then form the basis of agreeing appropriate planning gain contributions in respect of

- Social/affordable housing
- Contribution towards improving/replacing the White Bridge over the railway line
- Contribution towards education provision
- All of the above to recognise that this is a challenging brownfield site that should, nonetheless, be a priority for redevelopment through the active support of the Council

22. DB Schenker and their advisors would be pleased to enter into discussions with the Council in respect of the detail of the above suggested revised wording for site H4 in the proposed LDP. It is hoped that such discussions can take place as the experience elsewhere in Scotland has shown that the Development Plan Examination process is not an appropriate means or forum for discussion leading to agreement with the Council.

Conclusions

23. Overall the proposed allocation of this key brownfield site at the Muirton Yards, Tulloch, within the proposed Local Development Plan is welcomed. The site is the largest brownfield site in the urban area of Perth. Bringing this site back into productive use as a housing site would be strongly supported by Scottish Planning Policy (SPP). That same SPP would also clearly indicate that securing the redevelopment of this site should be a planning policy priority within the LDP. Furthermore, a high quality development on the site, with a masterplan and detailed layout that respects the key principles of placemaking, would make a significant contribution towards urban regeneration within what is now the City of Perth. Therefore, this is a site whose redevelopment should be positively facilitated by the planning system. To that extent the inclusion within the proposed LDP is a positive step forward.
24. However, the site will be a challenging one to develop for the reasons set out in this submission and for the reasons set out in the various studies that are summarised in the appendix to this submission. Therefore, various comments have been made in respect of the detail of the proposed allocation, the requirements for planning gain have been critically assessed, and a suggested revised wording for the LDP allocation has been suggested all reflecting the anticipated development economics. All of the suggested changes are designed to better facilitate the development of the largest remaining brownfield site within the boundary of the City of Perth.
25. The Council is respectfully requested to support this submission.

[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.

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

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

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

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

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

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

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

| | |
|----------------------|---|
| Name | Mr Mark Richardson |
| Address and Postcode | Ristol Ltd, Touch Business Centre, Touch Estate, Cambusbarron, Stirling FK8 3AQ |
| 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. | Spatial Strategy - Highland Perthshire Area | or | | | |
| Site ref. | Birnam and Dunkeld - E12 and E13 - Tullymillly | or | | | |
| Chapter | 6 | Page no. | 161 | Paragraph no. | 6.3 |

Perth and Kinross Local Development Plan – Proposed Plan Representation Form

4. What is your representation?

Are you supporting the Plan?

Or

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

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

Atholl Estates welcome the allocation of two employment sites at Tullymilly. Having developed a rural property portfolio within Highland Perthshire, Atholl Estates consider appropriately sited and scaled commercial property is essential to supporting the rural economy.

Specifically, the sites at Tullymilly can assist with local employment opportunities for Birnam and Dunkeld and the surrounding area.

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| Policy ref. | Spatial Strategy - Highland Perthshire Area | or | | | |
| Site ref. | Ballinluig - E11 and H40 | or | | | |
| Chapter | 6 | Page no. | 170 | Paragraph no. | 6.6 |

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

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See Attached Representation Form

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See Attached Representation Form

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Representation Form

Perth and Kinross Council – Local Development Plan

Proposed Plan - January 2012

Chapter 6 – Spatial Strategy – Highland Perthshire - Section 6.6 – Ballinluig

Ristol Ltd
 Touch Business Centre
 Touch Estate
 Cambusbarron
 Stirling FK8 3AQ

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Atholl Estates welcome the proposed allocations for employment (E11) and residential (H40) development at Ballinluig within the Proposed Local Development Plan January 2012.

Both sites were assessed as part of the Estate's submission to the Main Issues Report in February 2011, which included a detailed site analysis and preparation of a Draft Development Framework (Page Park), establishing a credible and deliverable proposals for inclusion within the Proposed Plan.

Atholl Estates welcomes and supports Perth & Kinross Council's recognition of the important role Ballinluig plays in the landward area and in its relationship with Pitlochry, with a particular emphasis on economic growth and housing provision.

Site Ref.E11 – West of Ballinluig – General Employment Use

The Proposed Plan supports the extension of the existing employment land to the south of the village to the site to the west of the A9, which benefits from the proximity of and easy access to the A9. The Page Park Development Framework (Appendix 1) confirms the sites good access connections and its visibility from the A9, making development of this site attractive for commercial uses.

Atholl Estates welcomes and supports the Proposed Plan designation of employment land for land industrial units in order to encourage further local sustainable economic growth at their site at E11 – West of Ballinluig. Having developed a rural commercial property portfolio within Highland Perthshire including Ballinluig (occupied by Nae Limits), Atholl Estates consider appropriately sited and scaled commercial property is essential to support the local rural economy.

Atholl Estates support the site specific developer requirements as contained within Proposal E11. These four key requirements will be addressed as part of a subsequent planning application, including a full flood risk assessment. Atholl Estates understands that the commercial development will be required to provide safe access and egress above the flood level associated within a 1:200 year +20% storm level and believe that with imaginative solutions the area could be developed, as part of a future planning application.

Site Ref.H40 – Ballinluig North – 45 Units

The Proposed Plan seeks to continue residential growth in the northern area of the village by expanding the existing designation for future residential development. The Page Park draft Development Framework (Appendix 1) promoted the consolidation of the existing woodland area to

the north of the village and the focus of new residential development on the lower and higher levels of this retained woodland area. The Proposed Plan allocation H40 seeks to deliver a landscape strategy which retains the woodland area, encouraging local access to the woodland and delivering residential development on the upper and lower areas.

Concluding Comment

Over the past 5 years, Atholl Estates have successfully delivered commercial floorspace and affordable housing (in partnership with Perth Housing Association) in Ballinluig and the Estate hope to continue to deliver on the Proposed Plan sites in Ballinluig.

Atholl Estates support the allocation and are actively involved in a community consultation exercise into future amenity requirements for the village, being coordinated by Perth & Kinross Council. This will help inform the detailed proposals for both sites as part of the scheme progression.

Atholl Estates fully support the proposals included in the *Proposed Plan* at Ballinluig.

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. | Policy NE5 : Greenbelt | or | | | |
| Site ref. | | or | | | |
| Chapter | | Page no. | | Paragraph no. | |

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

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

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

Ristol Ltd are instructed by the John Dewar Lamberkin Trust to submit representations on Policy NE5.

These representations should be read in conjunction with separate submission in relation to Proposal H70 (Perth West) and accompanying development requirements.

The Lamberkin Trust support the exclusion of land forming part of Proposal H70 from the Greenbelt and its identification for strategic development. As contained within separate representations on Proposal H70, the Lamberkin Trust consider that the outer boundary of the proposed Greenbelt should be adjusted as shown in accompanying Figure 1, to reflect detailed landscape evaluation, the transportation access strategy and accompanying concept masterplan. The adjustments to the proposed greenbelt boundary reflect considered evaluation and seek to ensure that the eventual Greenbelt boundary reflects the aims and objectives of the Scottish Planning Policy. These are to ensure that the character and identity of Perth are maintained whilst enabling development to come forward that enables wide and improved public access to the countryside within the Plan period.

Attachment - Figure 1

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

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

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

| | | | | | |
|-------------|--|----------|----------------------|---------------|----------------------|
| Policy ref. | <input type="text" value="5.1 Perth Area Spatial Strategy"/> | or | | | |
| Site ref. | <input type="text"/> | or | | | |
| Chapter | <input type="text"/> | Page no. | <input type="text"/> | Paragraph no. | <input type="text"/> |

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

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

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

Ristol Ltd are instructed by the John Dewar Lamberkin Trust to submit representations on the Spatial Strategy for the Perth area. These representations should be read in conjunction with separate submissions on policy areas and in particular proposal H70 (Perth West) and its accompanying development framework.

The Lamberkin Trust support the spatial strategy for Perth which includes a series of strategic development releases including land to the west of Perth covered by Proposal H70. Separate representations have been made in relation to a masterplan concept for Proposal H70 (Perth West) and the Greenbelt boundary.

In relation to the spatial strategy, the Lamberkin Trust note that the Tay Plan is currently being assessed by Scottish Ministers through the development plan Inquiry and that the findings may result in an adjustment to the housing requirement for the Perth area. This may increase due to updated GRO population projections, and as such elevates the importance of a series of strategic development releases around Perth, of which Proposal H70 (Perth West) is an integral part of the future spatial strategy.

However, should the housing requirement be adjusted downwards, the Lamberkin Trust consider that Proposal H70 (Perth West) should remain the primary location for future development, due to the deliverability of the site within the plan period and the opportunity it presents to deliver the vision and placemaking objectives underpinning the Local Development Plan.

Furthermore, should the appeal into land at Almondvalley against Perth and Kinross Council's refusal of the planning application for 1,600 houses be approved, then the Lamberkin Trust consider that Proposal H70 (Perth West), should still continue as an allocation within the Local Development Plan on the basis of its deliverability, desirability and the benefits of adopting a holistic land-use plan for the western side of Perth from the A9 to Inveralmond.

In relation to s.5.1.11, the Lamberkin Trust consider that Proposal H70 (Perth West) can deliver a greater level of housing within the period to 2024 than proposed and that the amount should be re-assessed as part of the finalisation of the Proposed Plan and additional project assessment underway as detailed in separate representations.

In relation to s.5.1.14-17 the accompanying submission made on proposal H70 (Perth West) includes a transportation assessment that is closely aligned to the measures contained in the Council's Perth Transport Futures document.

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

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

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

| | |
|----------------------|---|
| Name | Mark Richardson |
| Address and Postcode | Ristol Ltd, Unit 2, Touch Business Centre, Touch Estate Cambusbarron, Stirling FK8 3AQ |
| Telephone no. | [REDACTED] |
| Email address | [REDACTED] |

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

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| Policy ref. | Policy NE4 : Green Infrastructure | or | | | |
| Site ref. | | or | | | |
| Chapter | | Page no. | | Paragraph no. | |

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

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

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

Ristol Ltd are instructed by the John Dewar Lamberkin Trust to submit representations on Policy NE4.

The Lamberkin Trust support the concept of green infrastructure and its relationship with the central Scotland green network. In relation to associated representations on Proposal H70 (Perth West) and its accompanying development requirements, the Lamberkin Trust have submitted extensive representations which incorporate the principals of green infrastructure within the concept masterplan. The Lamberkin Trust request that this concept is taken forward into the adopted Local Development Plan.

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|-------------|--|----------|----------------------|---------------|----------------------|
| Policy ref. | <input type="text" value="Policy TA1 : Transport Standards and Accessibility Requirements"/> | or | | | |
| Site ref. | <input type="text"/> | or | | | |
| Chapter | <input type="text"/> | Page no. | <input type="text"/> | Paragraph no. | <input type="text"/> |

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

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Ristol Ltd are instructed by the John Dewar Lamberkin Trust to submit representations on Policy TA1 A and B. The Lamberkin Trust support the vision of Perth and Kinross Council's transport strategy noting that this is to "provide a transport system in and around Perth that will support sustainable economic growth, protect and improve the environment and improve social inclusion and accessibility". To this end the Lamberkin Trust considers that Policy TA1 B highlights the importance that all development proposals should seek to actively reduce travel demand by car and as such initiatives which facilitate this objective should be given a priority waiting over other developer contributions.

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|-------------|---|----------|--|---------------|--|
| Policy ref. | Policy PM3 : Infrastructure Contributions | or | | | |
| Site ref. | | or | | | |
| Chapter | | Page no. | | Paragraph no. | |

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

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

Ristol Ltd are instructed by the John Dewar Lamberkin Trust to submit representations on Policy PM3.

The Lamberkin Trust recognise that strategic developments will require the delivery of infrastructure improvements. The type of scale of infrastructure will clearly be dependent on the nature of the project. The provision of offsite facilities (Policy PM3 criteria B) needs to be carefully evaluated within the context of wider project deliverability. It is the Lamberkin Trust's position that given the scale of infrastructure investment required to deliver strategic projects within the Perth Housing Market Area in order to achieve and maintain a five year land supply, the requirement for developer contributions needs to be balanced against the need to ensure the deliverability of future strategic projects.

The Lamberkin Trust therefore request that Policy PM3 is qualified to expressly support the principal of strategic projects and recognise that in the interests of deliverability the scale of developer contributions needs to be assessed on a project by project basis. This should reflect guidance in Circular 1/2012 Planning Agreements.

The Lamberkin Trust note that further supplementary guidance covering developer contributions in relation to transport, infrastructure and community facilities and green infrastructure will be developed within the plan period, and request that appropriate consultation is given in the formation of these policy documents.

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| Policy ref. | Policy PM2 : Design Statements | or | | | |
| Site ref. | | or | | | |
| Chapter | | Page no. | | Paragraph no. | |

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

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

Ristol Ltd are instructed by the John Dewar Lamberkin Trust to submit representations in support of Policy PM2.

In relation to strategic development sites such as Proposal H70 (Perth West), the Lamberkin Trust consider that design statements should be incorporated into a wider masterplan and as such PM2 should make provision for design statements forming an integral part of masterplans for strategic development projects.

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|-------------|--|----------|--|---------------|--|
| Policy ref. | NE5: Greenbelts and Settlement Map - Perth | or | | | |
| Site ref. | | or | | | |
| Chapter | | Page no. | | Paragraph no. | |

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

4. What is your representation?

Are you supporting the Plan?

Or

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

Ristol Ltd are instructed by a private client to submit an objection to the exclusion of land at Rhynd Road, Wester Tarsappie, Perth from the Perth Settlement Boundary and its inclusion within the proposed Greenbelt.

These representations seek the extension of the settlement boundary as shown in the accompanying Figure 1 to include the two sites subject to these representations and its associated exclusion from the proposed Greenbelt.

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

See accompanying representation form.

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Representation Form

Representations on Perth and Kinross Council Proposed Plan

Perth Settlement

Policy NE5: Greenbelts and Settlement Map - Perth

Ristol Ltd

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Cambusbarron
Stirling FK8 3AQ

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Ristol Ltd are instructed by a private client to submit an *objection* to the exclusion of land at Rhynd Road, Wester Tarsappie, Perth from the Perth Settlement Boundary and its inclusion within the proposed Greenbelt.

These representations seek the extension of the settlement boundary as shown in the accompanying Figure 1 to include the two sites subject to these representations and its associated exclusion from the proposed Greenbelt.

The case rests on a comprehensive landscape assessment of the area and site, as undertaken by landscape consultants Ian White Associates (*Appendix 1*), a Development Layout (*Appendix 2*) and a Noise Feasibility Study (*Appendix 3*). These submissions establish that the sites form a logical extension to Wester Tarsappie, that they are suitable for development with some minor noise attenuation measures and a sensitively designed development for five houses on site 1 and one house on site 2. The sites would meet local housing demand and are deliverable.

Underpinning this submission is the landscape evaluation and advice taken by Ian White Associates. The study has guided the planning case and associated design process. The approach adopted by Ian White Associates has been to:

1. Consider the character of the wider landscape and the context for the site
2. Establish the nature of the views to the site from the viewpoints
3. Outline a landscape strategy which will integrate with the proposed development within the surrounding landscape

The character of the existing landscape and resulting context of the site is largely established by the lack of site management which results in an overgrown piece of land in comparison to the managed pasture out with the building group of Wester Tarsappie. The landscape assessment notes that the development proposals “*should be considered as an opportunity to strengthen and improve the landscape*”.

The sites are mainly viewed by south bound traffic on the M90, from the industrial areas in Lower Friarton and Moncrieffe and in particular, from the summit of Kinnoull Hill. The development will

be below the skyline of the existing bungalows on Rhynd Road. The accompanying cross-sections contained in the James Denholm Planning Drawings detail how the proposed units for both sites fit within the landscape without detriment to the visual amenity.

The proposed landscape strategy seeks to improve the quality of the setting of the proposed development and the general setting of the city by extending existing elements in the landscape. The landowner will extend the mixed woodland planting across the lower slopes of the site. The planting combined with the modified landform will reduce the impact of motorway traffic to the benefit of existing residents, together with improving the view into the site for southbound traffic crossing the Friarton Bridge. The proposed planting will significantly improve the strength of the landscape framework and therefore the quality of the setting of the city of Perth. The Landscape Appraisal prepared by Ian White Associates includes a photo montage (Appendix 2 – *Section 4 - Visual Impact*) which illustrates the woodland in situ and the overall upgrade of the landscape context for the site and the wider area, when viewed from Kinnoull Hill.

The introduction of this significant area of woodland on the north west edge of Wester Tarsappie will together with a further area of woodland planting on the south east edge of the building group, significantly improve the strength of the landscape setting and therefore the quality of the setting of the city.

In conclusion, the landscape appraisal considers that the development proposals at Rhynd Road, Wester Tarsappie will deliver a high quality residential development complimented by a strong landscape framework which will improve the overall environmental quality of the Wester Tarsappie building group.

Enclosures:

Figure 1 – Site boundary

Appendices:

Appendix 1 - Landscape assessment

Appendix 2 - Development Layout

Appendix 3 - Noise Feasibility Study

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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| Policy ref. | Policy PM1: Placemaking | or | | | |
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Perth and Kinross Local Development Plan – Proposed Plan **Representation Form**

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Ristol Ltd are instructed by the John Dewar Lamberkin Trust to support Policy PM1 a, b, and c in relation to placemaking. Accompanying representations made in relation to Proposal H70 (Perth West) and the development requirements seek to translate these placemaking objectives into a site specific context.

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| Policy ref. | Strathearn Area - Gleneagles | or | | | |
| Site ref. | | or | | | |
| Chapter | | Page no. | | Paragraph no. | |



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Representation Form

Representations on Perth and Kinross Council Proposed Plan

Strathearn Area - Gleneagles

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 Cambusbarron
 Stirling FK8 3AQ

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Ristol Ltd are instructed by a private client to *support* the spatial strategy in relation to Gleneagles. This representation follows on from earlier submissions made on the *Main Issues Report* (January 2011) objecting to a proposed development site (E map 43) and representations made on a planning application (Reference 11/00748/FLL) which was subsequently withdrawn. Our client welcomes Perth and Kinross Council's consideration of early representations and the resultant spatial strategy for Gleneagles as contained within the *Proposed Plan*. This is underpinned by the importance of the *Historic Garden and Designed Landscape* related to the Gleneagles Hotel and the access and ownership issues that constrain development off Muirton Road, as explored in the *Main Issues Report* (site E map 43).

Our client would note that there is currently a planning condition in force (*reference consent*) preventing access off Muirton Road for future residential development in the Gleneagles area.

Previous submissions made by Ristol Ltd on behalf of our client in relation to the *Main Issues Report* contained a series of appendices covering independent landscape analysis, road junction evaluation and submissions in relation to the previous planning application. Copies of these submissions are not included within this representation, but are available if required.

In conclusion the reasons for excluding the expansion of Gleneagles off the Muirton Road through the allocation of site E map 43 are summarised below:

1. Delivery - The site appears undeliverable on the basis access is required through third party land which will not be made available. It is therefore a constrained site that is unlikely to be delivered within the LDP timeframe, thereby constraining housing land supply within the Strathearn catchment;
2. Contrary to transportation policy – the site's location does not achieve national policy objectives as advanced by *Scottish Planning Policy* and *Designing Streets* in relation to delivering accessible and connected locations which facilitate non vehicular movement

3. National landscape policy constraint - The site forms an integral part of a designated *Historic Garden and Designed Landscape*, which the adopted *Strathearn Local Plan* seeks to protect (policy 19) in response to wider national policy frameworks. The assessment work undertaken as part of this representation establishes that development of proposed allocation Site E would materially impact on the character and setting of the designated *Historic Garden and Designed Landscape*.
4. Settlement coalescence - The *Proposed Plan* highlights the need to prevent coalescence of Gleneagles Village and Auchterarder. The northern boundary of the proposed housing site E is on a prominent visual ridge which lacks strong woodland planting that would have the potential to reduce visual impact on the existing residential development. The current settlement boundary between is clearly defined in the adopted *Strathearn Local Plan* (Policy 74) and is drawn tightly behind the existing properties on Muirton Road which connects Gleneagles village and Auchterarder. It is clear that this long established boundary is intended to protect the character and setting of the respective settlements.

Extending the settlement boundary to include the undefined southern and eastern boundary of proposed Site E would lead to the erosion of this clearly defined and sensitive boundary. Historic planning decisions have sought to retain this defined boundary and it is therefore safe to conclude that the existing boundary is a clearly defensible edge to Gleneagles that should be protected and preserved.

5. Design constraints - The design precedent for the site is sourced from Caledonian Crescent, which is based on low density housing within a wooded landscape and excluded from the *Inventory of Gardens and Designed Landscapes*. This requires a mature tree lined edge to the existing settlement boundary which does not exist in the context of the Muirton Road properties. As the accompanying landscape assessment establishes, development of the proposed allocation Site E would not reflect this design precedent and result in a visually prominent, uncontained housing estate.

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|-------------|---|----------|-----|---------------|-----|
| Policy ref. | Spatial Strategy - Highland Perthshire Area | or | | | |
| Site ref. | Land at A923/Blairgowrie Road Junction, Dunkeld | or | | | |
| Chapter | 6 | Page no. | 161 | Paragraph no. | 6.3 |

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.

See Attached Representation Form

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

See Attached Representation Form

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Representation Form

Perth and Kinross Council – Local Development Plan

Proposed Plan - January 2012

Chapter 6 – Spatial Strategy – Highland Perthshire Area

6.3 – Birnam and Dunkeld – Land at A923/Blairgowrie Road Junction, Dunkeld

Ristol Ltd
 Touch Business Centre
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 Cambusbarron
 Stirling FK8 3AQ

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Atholl Estates object to the proposed settlement boundary identified within the *Local Development Plan Proposed Plan* for Dunkeld, with particular reference to land at A923/Blairgowrie Road junction, Dunkeld (*Main Issue Report* Site Reference 390). Atholl Estates object to the *Proposed Plan's* exclusion of Birnam Dunkeld for future development potential and in particular the allocation of their land at the A923/Blairgowrie Junction.

Chapter 6 of the *Local Development Plan Proposed Plan* states

“In line with the TAYplan hierarchical settlement approach, the Plan concentrates the majority of development within the principal settlements of Aberfeldy, Dunkeld/Birnam and Pitlochry. It does, however, recognise that these settlements have various topographical and environmental constraints which limit the scope of the development. In particular, Birnam/Dunkeld has significant constraints, which have resulted in no designations for residential development within these settlements” (**LDP-Proposed Plan, pg 152, para 6.1.11**)

The Proposed Plan further references Dunkeld as “important local shopping and commercial centres, servicing both residents, and tourists, retail needs” (LDP-Proposed Plan, pg 152, para 6.1.11). The Proposed Plan notes that Dunkeld has a good range of shops and confirms that “The Plan recognises the importance of these town centres and seeks to protect and enhance them” (LDP-Proposed Plan, pg 152, para 6.1.11)

Atholl Estates agrees with the Council in its assessment of the importance of Dunkeld/Birnam for the local and surrounding areas. However, the Estate fails to understand the logic behind the Council's decision not to allocate the subject site for development when it offers an effective development site in close proximity to the established infrastructure and services available in Dunkeld/Birnam.

Chapter 6.3, pg 161 of the Proposed Plan considers that the settlement of Birnam/Dunkeld is highly constrained and future development potential is extremely limited.

Atholl Estates agrees that the settlement as a whole is subject to the significant constraints presented by the A9, the River Tay and a number of heritage designations including the Conservation Area and the Designed Landscape Designation associated with Dunkeld House.

However, the subject site is not covered by any of these constraints. It is not constrained by potential flooding, or the neighbouring heritage designations. With regard to the sites topography, Atholl Estate have demonstrated to Perth & Kinross Council that a design solution can be delivered on the site, as illustrated in the Draft Development Framework prepared by Page Park and submitted to the Council as part of the Estates response to the Main Issues Report (enclosed at Appendix 1).

The site at A923/Blairgowrie Road Junction Dunkeld was the subject of a Local Development Plan Proposal within the Main Issues Report (Site 390) where it was described as follows;

“The proposal is for the extension of the settlement boundary for further residential development. Site potential for 15 high quality, mixed use tenure residential development” (MIR, Site No.390)

The Site Assessment prepared by Perth and Kinross Council dealt with a wide range of land use, infrastructure , landscape and heritage matters. Key conclusions drawn within the site assessment included;

- Residential development to the north, south and eastern boundaries of the site
- Easy walking distance of services, facilities and public transport in Dunkeld
- Edge of Town Centre site.
- Paddock detached from the wider countryside, located on the edge of the settlement boundary.
- Development on the site could be in keeping with the key characteristics of the Lower Highland Glens landscape character area, “particularly if it includes landscaping on the more prominent upper slopes to integrate development into the countryside setting of the settlement and enhance that settlement” (Site No.390, Site Assessment, Landscape)
- Adjacent to Conservation Area to the west and south
- Outwith the Dunkeld House Designed Landscape
- Site is not in an area of flood risk.

In response to the Main Issues Report and as part of Atholl Estates submission in response to the Main Issues Report, the Estate commissioned Page Park to prepare a Draft Development Framework. The development framework was prepared by taking account of the key site considerations which included its topography, access, the burn and the neighbouring heritage designations. The resulting development proposal, included within the enclosed Draft Development Framework identified three areas on the site, which are outlined below;

Area 1 – acts as a focus for a new landscape space on the line of the burn.

Area 2 – two areas of residential development which will nestle into the hillside topography

Area 3 – landscape buffers to enhance the setting of the upper slopes to the north of the site, as suggested within the MIR Site Assessment.

The draft development proposals were prepared to inform the Main Issues Report and open up discussions with Perth & Kinross Council with regard to the development potential of the site.

Post submission of representations on the *Main Issues Report*, Atholl Estates commissioned a landscape and visual assessment of the site. This was undertaken by Ian White associates and

involved consultation with Perth & Kinross Council's conservation officer. A copy of the assessment is contained in Appendix 2.

A key consideration of this exercise was to demonstrate that development of the site (and the allocated commercial land (Proposal E12 and E13)) would not have an adverse impact on either the Conservation Area or *Historic Garden and Designed Landscape*.

A comprehensive visual survey was undertaken combined with a detailed assessment of the landscape character of the site and setting.

The survey established that the existing properties on the northern boundary of the site are prominent.

As such, the sites topography requires a bespoke design solution in order to ensure that development achieves the requisite landscape "fit".

The analysis established that the likely impact of developing the site for a proposal as detailed in the Page Park development framework would be limited to views from the drive of Dunkeld House and the northern side of the grounds of Dunkeld Cathedral, which are not considered to be materially significant.

The assessment concluded that set within a strategic landscape strategy based on woodland boundary planting and a central amenity area with footpath link as proposed, development of the site could improve the northern approach to Dunkeld, general setting of the town, conservation area and views to Dunkeld House and the Cathedral.

Atholl Estates object to the settlement boundary for Birnam and Dunkeld as included within the Local Development Plan – Proposed Plan and requests that it is now amended to include the site at the A923/Blairgowrie Junction, as illustrated on the enclosed Proposals Map (Figure 1). The site is not subject to the significant constraints referenced in the Proposed Plan. The Draft Development Framework demonstrates that a residential development of circa 15-20 could be accommodated on the site without detriment to the immediate area and the wider heritage resource.

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

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

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

| | |
|----------------------|---|
| Name | Mark Richardson |
| Address and Postcode | Ristol Ltd, Unit 2, Touch Business Centre, Touch Estate Cambusbarron, Stirling FK8 3AQ |
| Telephone no. | [REDACTED] |
| Email address | [REDACTED] |

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

2. Which document are you making a representation on?

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

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

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

| | | | | | |
|-------------|--|----------|----------------------|---------------|----------------------|
| Policy ref. | <input type="text" value="RD3: Housing in the Countryside"/> | or | | | |
| Site ref. | <input type="text"/> | or | | | |
| Chapter | <input type="text"/> | Page no. | <input type="text"/> | Paragraph no. | <input type="text"/> |

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

4. What is your representation?

Are you supporting the Plan?

Or

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

However Ristol Ltd object to Policy RD3's position in relation to Greenbelts and a statement that this policy does "not apply within the Greenbelt".

Ristol Ltd therefore request that Scottish Ministers amend Policy RD3: Housing in the Countryside to provide for its application in the Greenbelt.

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

See accompanying representation form.

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Representation Form

Representations on Perth and Kinross Council Proposed Plan

Policy RD3: Housing in the Countryside

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Touch Estate
Cambusbarron
Stirling FK8 3AQ


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Ristol Ltd welcome the continued application of the *Housing in the Countryside* Policy and, having been involved in this application and a range of projects to date, Ristol Ltd recognise that it establishes a sound policy basis to direct and regulate rural residential developments. The Policy provides an important contribution to rural housing land supply and Ristol Ltd support the framework contained within the Policy, particularly the drive for the sensitive siting of new development and the advancement of high quality design.

However Ristol Ltd *object* to Policy RD3's position in relation to Greenbelts and a statement that this policy does "*not apply within the Greenbelt*".

As detailed in complimentary representations in relation to *Policy NE5: Greenbelts*, Ristol Ltd contend that the role of building groups and clusters as defined in sections 1 and 2 of the *Housing in the Countryside* Policy provide a tight policy framework to control the siting of new development. Whether the site under consideration is within the Greenbelt or not should have limited, if any bearing since the overall policy thrust is to only permit acceptable development within the countryside.

This reflects the Policy Guidance contained in the *Scottish Planning Policy* in relation to encouraging a vibrant and dynamic rural economy. Ristol Ltd note that the objection of the Greenbelt policy is to protect the landscape setting in character of an area and to support public access to the countryside. It is unlikely that developing within building groups would override the strategic policy function, however removing Greenbelt as a policy constraint for developing within building groups would support rural enterprise and access to the countryside, which is the basis for the *Housing in the Countryside* Policy.

Ristol Ltd therefore request that Scottish Ministers amend *Policy RD3: Housing in the Countryside* to provide for its application in the Greenbelt.

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

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| Address and Postcode | Ristol Ltd, Unit 2, Touch Business Centre, Touch Estate Cambusbarron, Stirling FK8 3AQ |
| Telephone no. | [REDACTED] |
| Email address | [REDACTED] |

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

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

| | | | | | |
|-------------|-----------------|----------|--|---------------|--|
| Policy ref. | NE5: Greenbelts | or | | | |
| Site ref. | | or | | | |
| Chapter | | Page no. | | Paragraph no. | |

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

4. What is your representation?

Are you supporting the Plan?

Or

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

Ristol Ltd are instructed by a private landowner to submit an objection in relation to the policy content of NE5: Greenbelts. It is our client's view that this policy should not preclude the application of the Housing in the Countryside Policy which forms Supplementary Guidance accompanying the Local Development Plan (LDP).

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

See accompanying representation form.

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Representation Form

Representations on Perth and Kinross Council Proposed Plan

Policy NE5: Greenbelts

Ristol Ltd

Touch Business Centre
Touch Estate
Cambusbarron
Stirling FK8 3AQ

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Ristol Ltd are instructed by a private landowner to submit an *objection* in relation to the policy content of *NE5: Greenbelts*. It is our client's view that this policy should not preclude the application of the *Housing in the Countryside* Policy which forms Supplementary Guidance accompanying the *Local Development Plan (LDP)*.

The *Housing in the Countryside* Policy established a sound basis to direct and regulate rural residential development. The Policy provides an important contribution to rural housing land supply, with its drive towards the sensitive siting of new development and the advancement of high quality design. Our client notes the role of building groups and clusters as defined in sections 1 and 2 of the *Housing in the Countryside* Policy and their importance in controlling the siting of new development.

It is within this context that our client *objects* to policy NE5's position that the *Housing in the Countryside* Policy "*does not apply in the Greenbelt*". This restriction seems to introduce an unnecessary layer of control given the definition of building groups and infill sites and what is therefore permitted within these defined areas. As witnessed by recent planning consents, the *Housing in the Countryside* Policy advances sound land use change within rural areas. To this effect, whether the site under consideration is within the Greenbelt or not should have limited, if any, bearing since the overall policy thrust is to permit acceptable development in the countryside.

The *Scottish Planning Policy* seeks to encourage a vibrant and dynamic rural economy. Our client notes that the objectives of the Greenbelt policy are to protect the landscape setting and the character of an area and to support public access to the countryside. It is unlikely that developing within building groups would override this strategic policy function. However, removing Greenbelt as a policy constraint for developing within building groups would support rural enterprise and access to the countryside. Anecdotal evidence suggests that rural locations are more likely to support homework enterprises and local employment ventures.

To this effect Ristol Ltd are therefore instructed to :

1. Object to *Policy NE5: Greenbelt's* position that the *Housing in the Countryside* Policy does not apply in the Greenbelt.

2. Request that this Policy provision is adjusted with corresponding changes in the *Housing in the Countryside* Policy, to provide for the application of the *Housing in the Countryside* Policy within Greenbelts.

3. Should Scottish Ministers determine against such a change, our client requests that the LDP is amended to identify settlement boundaries around small settlements within Greenbelt locations which would mean that within these areas the application of the *Housing in the Countryside* Policy would apply.

4. Within the context of the point above, Ristol Ltd are instructed to request that Scottish Ministers identify a small boundary to the Kingswell area east of Perth as shown in the accompanying Figure 1.

Enclosures:

Appendix 1 - Figure 1

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 | Mr Mark Richardson |
| Address and Postcode | Ristol Ltd, Touch Business Centre, Touch Estate, Cambusbarron, Stirling FK8 3AQ |
| Telephone no. | [REDACTED] |
| Email address | [REDACTED] |

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2. Which document are you making a representation on?

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

| | | | | | |
|-------------|---------------------------------------|----------|-----|---------------|------|
| Policy ref. | Spatial Strategy - Kinross-shire Area | or | | | |
| Site ref. | Keltybridge and Maryburgh | or | | | |
| Chapter | 7 | Page no. | 224 | Paragraph no. | 7.12 |

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

4. What is your representation?

Are you supporting the Plan?

Or

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

See Attached Representation Form

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

See Attached Representation Form

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Representation Form

Perth and Kinross Council – Local Development Plan

Proposed Plan - January 2012

*Chapter 7 – Spatial Strategy – Kinross-shire Area
Section 7.12 – Keltybridge and Maryburgh*

Ristol Ltd
Touch Business Centre
Touch Estate
Cambusbarron
Stirling FK8 3AQ



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Ristol Ltd are instructed by Mr & Mrs K Adam to submit representations to the *Perth & Kinross Council Local Development Plan Proposed Plan* concerning their land interests at Keltybridge and Maryburgh.

Keltybridge

Our Clients object to the reduction of the western edge of the settlement boundary at Keltybridge. The settlement boundary as provided within the *adopted Kinross Area Local Plan 2004* included our Clients' steading building and its immediate environment. A copy of the Proposals Map from the 2004 Plan is included for ease of reference. A site plan illustrates our Clients' amendment to the village boundary at Keltybridge.

The housing allocation contained within the *Kinross Area Local Plan H13* has altered the character of this area of Keltybridge Village. Our Clients are considering a modest redevelopment of the steading with some limited new build residential development on the site, in keeping with the development to the east with the aim of providing homes for the local housing market.

Our Clients consider there is no clear justification for the reduction in the settlement boundary at Keltybridge and object to the *Local Development Plan Proposed Plan* on this basis. Our Clients seek the extension of the settlement boundary to the west as illustrated on the amended Proposals Map (See Figure 1 attached).

Maryburgh

Our Clients object to the proposed village settlement boundary at Maryburgh and wish to extend it to the north and to the south as illustrated on the enclosed site plan (See Figure 1 attached). Our Clients wish to secure a single plot in each location at Maryburgh, a proposal which is considered to be in keeping with the character and established settlement pattern of the village.

The proposed settlement extension to the south of the village would extend the settlement boundary into the Historic Gardens and Designed Landscape designation associated with Blair Adam. Our Clients are keen to protect the integrity of the Blair Adam *Historic Garden and Designed Landscape*

designation and will ensure that any future development at Maryburgh will reflect the character of the village and the wider historic designation.

The Inventory schedule for the Blair Adam Historic Garden and Designed Landscape notes that the "*M90 Motorway now forms the eastern boundary of the site*". Our Clients consider that the main focus of the Estate is Blair Adam House and its landscape setting and their development proposals for Maryburgh will not impact on these core elements of the Historic Garden and Designed Landscape designation.

Our Clients' proposals to extend the settlement boundary of Maryburgh will provide two residential plots to meet local market need without detriment to Maryburgh and its local environment (See Figure 1 attached).

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 | Mark Richardson |
| Address and Postcode | Ristol Ltd, Unit 2, Touch Business Centre, Touch Estate Cambusbarron, Stirling FK8 3AQ |
| Telephone no. | [REDACTED] |
| Email address | [REDACTED] |

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| | | | |
|------------------------|-------------------------------------|---------------------------------------|--------------------------|
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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. | H70 and Development Requirement | or | | | |
| Site ref. | | or | | | |
| Chapter | | Page no. | | Paragraph no. | |

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

4. What is your representation?

Are you supporting the Plan?

Or

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

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

See accompanying representation form.

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Representation Form

Representations on Perth and Kinross Council Proposed Plan

Policy H70 and Development Requirement

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Stirling FK8 3AQ

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Introduction

Ristol Ltd are instructed on behalf of the John Dewar Lamberkin Trust (Lamberkin Trust) to submit its representations on Proposal H70 (Perth West) and its accompanying development framework. These representations should be read in conjunction with associated submission on the vision and policies within the *Local Development Plan Proposed Plan (Proposed Plan)*, notably on placemaking, design statements, infrastructure contributions, transportation standards, green infrastructure, the greenbelt and the Perth spatial strategy.

The Lamberkin Trust have a significant land interest in Perth West. Representations submitted by the Trust on the *Local Development Plan Main Issues Report* in January 2011, supported the principles of the western expansion of Perth and outlined the Lamberkin Trust's willingness to actively contribute towards the design evolution and implementation of the project.

Following Perth and Kinross Council's decision in January 2012 to include Perth West as a strategic development area within the spatial strategy of the *Proposed Plan*, the Lamberkin Trust have assembled a professional team to assist with project testing and evaluation. The team's capabilities cover the key areas identified within the Development Requirement accompanying Proposal H70, notably masterplanning, transportation planning, landscape assessment and infrastructure design and planning. Due to Perth and Kinross Council's relatively recent commitment to the Perth West as an integral part of the new spatial strategy within the *Proposed Plan*, the Lamberkin Trust have structured their submission as follows:

1. A broad feasibility and concept strategy within the statutory timeframe for representations on the *Proposed Plan*
2. Detailed assessments, relating to the Proposed Plan representations to follow as supplementary information during the spring and summer of 2012.

This approach is intended to be constructive and guide detailed assessment of the project through the *Local Development Plan* review process, whilst recognising the time parameters resulting from the recent advancement of the concept by Perth and Kinross Council.

These representations therefore deal with a strategic assessment of the site and advance a development concept. In support of this submission are the following reports, found in the Appendices to this submission;

1. Landscape appraisal
2. Traffic and transportation considerations
3. Amenity survey
4. Infrastructure appraisal
5. Concept masterplan

These representations support the allocation H70 and accompanying development framework, including the nine principles required to guide the advancement of Perth West. These principles have guided this stage of project testing, and conclude that proposal H70 has the potential to deliver a strategic development allocation that promotes the *Proposed Plan's* vision for Perth and the placemaking principles underpinning the spatial strategy. This includes delivering mixed use communities that forge meaningful changes in car usage, connecting new development to established infrastructure, facilitating investment in strategic infrastructure projects, using landscape to guide the identification of development areas and, as importantly the protection and enhancement of sensitive areas, delivering "green infrastructure" and investing in public realm with the benefit of existing and new neighbourhoods. Responding to these principles and applying these to the site's specific characteristics of the western area of Perth has been at the centre of the work commissioned by the Lamberkin Trust in order to inform these representations. In summary the technical reports accompanying this representation establish the following parameters:

Landscape Assessment (Appendix 1)

Ian White Associates were instructed to provide a preliminary landscape appraisal of the western edge of Perth in order to guide and inform the preparation of a concept masterplan. The aim of the appraisal was to identify issues and landscape concepts which would be relevant to proposal H70 and would also enhance the quality of the setting of the city, increase biodiversity and improve opportunities for recreation. The approach adopted was to:

1. consider the character of the landscape and concept of the site
2. consider the character of the existing urban edge
3. consider opportunities for public access and recreation
4. establish landscape capacity
5. outline a possible landscape strategy which could guide the development into the site and provide increased recreational opportunities.

The analysis concludes that the allocation H70 comprises three types of landscape character,

1. the western edge of Perth which forms an abrupt transition between the urban area and surrounding rural land
2. the farmland of the Broadvalley of the river Almond characterised by open fields of mature head rows, trees and scattered woodland
3. open landscape which is dominated by commercial woodland plantations on the high ground

between the valleys of the Almond and the Earn.

The potential development of the site therefore requires careful consideration of the appearance and transition between town and country. Through evaluating the landform, the potential outer edge of development, existing woodland, the existing urban edge and linkages between this site and Perth city, a landscape strategy has emerged, which can be implemented in five stages:

1. forming a new outer edge by linking existing woodlands and shelter belts
2. extending and strengthening the existing structure of woodland planting within the site to create a series of contained areas for new development that reflect the landscape and settlement character of small villages and building groups
3. using the land below overhead lines in a positive way to create a secondary green network incorporating SUDS provision
4. creating a Perth parkway "using avenue planting" which will act as a central spine for the development
5. improving links to Perth city.

This landscape strategy has informed the emerging concept masterplan, as detailed in *Appendix 5*.

Traffic and Transportation consideration (Appendix 2)

This work was intended to inform key aspects of the project and its ongoing evaluation through the *Local Development Plan review*. It draws heavily on national policy influences, highlighting the importance of strategic development facilitating ease of movement and establishing good connections and permeable networks. The work considers not only the context of the Perth West concept but its relationship with Perth and to that extent an amenity survey (*Appendix 3*) was undertaken to identify points of connection between the site and Perth city. Based on a radius of 1,600 metres (being considered the maximum walking distance) a wide range of established facilities were identified. These ranged from bus stops and open space through to neighbourhood centres and health care. Connecting these facilities is an established and extensive footpath and cycleway network offering the ability to connect the site into Perth through meaningful routes. Through the careful siting of future development a considered footpath, cycle and road network, a meaningful mix of land uses and connecting the development into established points of connection within Perth city, the potential to deliver high levels of non vehicular movement exists.

This conclusion reflects the fact that Proposal H70 is located on two multi modal transport corridors, notably the A9 to the south and the A85 to the north. These movement corridors cater for car, bus, pedestrian and cycle movements and connect the western edge of Perth to the city centre. Through careful junction detailing and investment in localised improvements to both corridors, Proposal H70 has the potential to connect into these established transport corridors. Initial designs have established that new junctions can be formed on both the A9 and A85 to meet requisite safety standards. Exploratory discussions with Transport Scotland have established the basis for progressing detailed evaluation of the relationship between the Perth West development proposal and the trunk road network in order to assess the potential impact and indeed opportunities for betterment that the proposal H70 will have on the trunk road network. Detailed design work is underway and will be submitted as supplementary information in advance of the Local Plan enquiry. This work will include an assessment of how the Perth West

proposal fits within the wider Perth and Kinross Council transport strategy, including public transport initiatives.

However this initial transportation work has established that the Perth West concept has the opportunity to deliver a wide range of modern transportation and placemaking improvements. It has the potential to become an exemplar project in terms of facilitating sustainable travel habits. As the transportation report details, this can be achieved through a strategic access strategy, a comprehensive pedestrian and cycle network, accessible and high standard bus service and the provision of strategic park and ride facilities and a street network that caters for all uses whilst advancing the needs of pedestrian and cyclists.

Concept Masterplan for Perth West (Appendix 4)

Incorporating the findings and recommendations from the landscape, transportation, amenity and infrastructure analysis, a concept masterplan has emerged to guide consideration of the Perth West (H70) and accompanying development framework. The concept masterplan seeks to identify a series of key land use principles which could inform development of the site through the Plan period. These land use principles have been guided by the vision and placemaking objectives underpinning the *Proposed Plan*. They translate into a masterplan based on a series of new villages set within a parkland landscape structure that connects the villages to key amenities and Perth City, whilst also affording existing neighbouring communities enhanced access to the countryside and associated recreational facilities.

This masterplan approach reflects the landscape context of the western area of Perth, which is characterised by a series of villages and small settlements such as Tibbermore, Methven and Almondbank. This village approach not only reflects the character of the area but also enables strategic development to be located and realised through a series of contained development areas in parallel with infrastructure improvements. The overall vision is to create a series of villages that reflect the character of the area and contribute towards the setting of Perth as opposed to simply creating a suburban western expansion of the city.

The new development *villages* will be of mixed tenure and vary in size but have the potential to deliver the overall housing allocation of 3,000 units within the total allocation size of approximately 792 acres. Precedent analysis of similar projects, such as the *urban villages forum*, Accordia (Cambridge), Knockroon (Dumfries) and European projects such as the Vuban (Freiberg) indicate 500 units per village being the optimum size.

The development areas are located to the south and north of allocation H70 set within the established and enhanced woodland setting. It is proposed to utilise the central part of the site, incorporating Noah's Ark and the road link to Perth as the primary parkland area, in recognition of its visual prominence and its accessibility.

Primary road access will be from the A9 and A85 through the formation of new road junctions which would each incorporate new park and ride facilities to capture both traffic heading into Perth and also form an accessible location within allocation H70 for residents to access public transport into Perth. The parkland incorporates footpath and cycle ways connecting the development areas to amenities whilst also linking into Perth city. A new pedestrian crossing is proposed over the A90 connecting to the

western edge of Perth.

A series of neighbourhood centres are proposed providing primary social and welfare facilities including education provision, the details of which will emerge through an education impact assessment. Analysis is underway in relation to a district heating system.

Representations:

The land use principles underpinning this concept masterplan are shared by the Lamberkin Trust and primary land owners to the north of allocation H70, making this vision a realisable proposition.

The Lamberkin Trust *support* the allocation of land to the west of Perth for strategic development and believe the technical reports accompanying this representation provide a deliverable and desirable development concept. In recognition of the recent introduction of this proposal into the *Local Development Plan* review process, the Lamberkin Trust will provide information in support of this representation dealing with key points of detail during the spring and summer of 2012. These will cover:

1. ongoing transportation assessment, notably in relation to trunk road junction design
2. concept masterplanner refinement
3. infrastructure evaluation
4. education impact assessment

In submitting these representations, the Lamberkin Trust consider that the concept masterplan accompanying this submission should form the basis of a development framework, to come forward as part of the *Local Development Plan* review and subsequent planning applications.

In light of the assessment work underway, Lamberkin Trust request that allocation H70 is adjusted to reflect the boundaries shown in *Figure 1* accompanying this submission. This reflects the landscape analysis and trunk road junction design.

Enclosures

Figure 1 - Site boundary

Appendices

- Appendix 1 - Landscape Assessment
- Appendix 2 - Traffic and Transportation consideration
- Appendix 3 - Amenity Survey
- Appendix 4 - Infrastructure appraisal
- Appendix 5 - Concept Masterplan

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.