

Issue 3	Placemaking	
Development plan reference:	PM1 – Placemaking, page 23 PM2 - Design Statements, page 24 RD1 - Residential Areas, page 31	Reporter: David Buylla
Body or person(s) submitting a representation raising the issue (including reference number):		
Lynne Palmer (00239) Portmoak Community Council (00638) Douglas Davidson (00743) Liz Hodgson (00853) Scottish Natural Heritage (05211) Theatres Trust (08819) John Beales (09092)		John Dewar Lamberkin Trust (09166) TACTRAN (09203) Archibald McHardy (09232) Arklay Guthrie (09692) G S Brown Construction Ltd (09817) Frank Moisey (09950) Homes for Scotland (10214)
Provision of the development plan to which the issue relates:	Placemaking policy group section with associated reference to Residential Development policy section.	
Planning authority's summary of the representation(s):		
<p><u>PM1 Placemaking</u> G S Brown Construction Ltd (09817/3/001): Policy PM1A – Off-site improvements are not the responsibility of developers to implement.</p> <p>Policy PM1C - Recycling centres are bad neighbours and should not be located within developments.</p> <p>Douglas Davidson (00743/3/001): The policy should more clearly state recognition of the impacts and effects that development may have sequentially on existing neighbouring property and place character.</p> <p>Theatres Trust (08819/1/002): Policy PM1B should be more specific in respect of exactly what existing infrastructure should be retained.</p> <p>Scottish Natural Heritage (05211/1/001): Welcome Perth & Kinross Council's commitment to delivering mixed, walkable environments and appropriate consideration for mitigation and adaption of climate change when assessing development proposals.</p> <p>An integrated approach should be adopted between associated placemaking supplementary guidance and the green infrastructure supplementary guidance referred to in Policy NE4 (S4_Doc_415).</p> <p>Policy PM1 B –</p> <ul style="list-style-type: none"> • criteria (b) is amended to state: 'Consider and respect site topography and any surrounding important landmarks, views or skylines, as well as the wider landscape character of the area'. • criteria (c) does not address landscape character specifically. 		

Additional criterion recommended including specific reference to green space, such as; *'ensuring the incorporation of green infrastructure into new developments with connections where possible to green networks'*.

Frank Moisey (09950/2/001): Policy PM1C – Recommended reduction in the threshold currently suggested to 100 units from 200 units either in a single site or over several sites, which would allow for the aims Policy PM3 (S4_Doc_496) to be broadened.

Homes for Scotland (10214/1/014): PM1C – Consider that the Placemaking Guide has been superseded by Scottish Government Policy; Designing Streets (Core_Doc_014). Perth & Kinross Council must ensure no contradiction of Scottish Government policy within their own guidance.

Arklay Guthrie (09692/7/001); TACTRAN (09203/2/001); John Dewar Lamberkin Trust (09166/10/001); John Beales (09092/1/003); Portmoak Community Council (00638/1/006): Support for Policy PM1

Homes for Scotland (10214/1/013): Conditional support for ethos of placemaking policy, with caveat concerns regarding deliverability through associated complex land ownership issues. Statement continues to say, *'the costs of incorporating new landscape and planting must be commensurate with the scale of development to ensure viability is not threatened'*.

PM2 Design Statements

John Dewar Lamberkin Trust (09166/8/001): In relation to strategic development sites such as Proposal H70 (Perth West) (S4_Doc_798), design statements should form an integral element of Masterplans.

RD1 Residential Areas

Lynne Palmer (00239/9/001) Need for better land efficiency in urban situations; for example 3+ storey buildings rather than single storey. Specific reference made to *'Perth City "small sites"'*, which could be developed for flats for optimum use of space.

TACTRAN (09203/8/001); Archibald McHardy (09232/1/002); Portmoak Community Council (00638/1/010): Support for Policy RD1.

New Policy

Liz Hodgson (00853/1/001): Request for additional planning policy on democracy within the LDP to enable greater protection and participation opportunities for the local community on planning related development issues with planning currently favouring the developer and private sector while other nations have planning laws, which give local communities more say and choice.

Modifications sought by those submitting representations:

PM1 Placemaking

G S Brown Construction Ltd (09817/3/001): PM1A delete *'beyond the site'*; PM1C delete *'recycling'*.

Douglas Davidson (00743/3/001): Amend to take account of sequential impact and effect on existing property and features.

Theatres Trust (08819/1/002): Amend criteria (g) to be more specific about what should be retained.

Scottish Natural Heritage (05211/1/001): Amend Policy PM1B (g) to include specific reference to green infrastructure and green networks; and additional wording to Policy PM1B (b and c) in terms of reference to wider landscape character of the area.

Frank Moisey (09950/2/001): Amend Policy PM1C to apply to a lower threshold of 100 units in a community, whether on one or many sites.

Homes for Scotland (10214/1/014): Delete reference to Placemaking Guide.

PM2 Design Statements

John Dewar Lamberkin Trust (09166/8/001): For strategic development projects, Design Statements should form an integral part of Masterplans.

RD1 Residential Areas

Lynne Palmer (00239/9/001): No specific modification sought but considers a need for efficiency and best use to be made of available space in small and infill developments.

New Policy

Liz Hodgson (00853/1/001): New planning policy providing local communities a greater say on planning and development issues.

Summary of responses (including reasons) by planning authority:

PM1 Placemaking

G S Brown Construction Ltd (09817/3/001): The overarching intention of this policy is to highlight, reinforce and respect the importance of established place and wider site context. It is a national objective as referred to in Scottish Planning Policy 2010 paragraphs 34 - 40 Sustainable Development (S4_Doc_329), paragraphs 77 – 85 Location and Design of New Development (S4_Doc_330) in association with Designing Places (Core_Doc_138) and Designing Streets (Core_Doc_014). This is identified as a regional objective through Policy 2 of TAYplan (S4_Doc_066). Development should relate and integrate with its surroundings, addressed on a site by site basis. This has been occasionally a failing of the past, with some settlement expansion plans taking place where the development has turned its back on an existing place and has failed to successfully recognise or deliver opportunities to link, integrate and effectively knit the proposed development into the existing surrounding urban and natural environment. Wherever links are sought beyond a development site, there is general cognisance for the associated financial implications of the developer requirements being commensurate with the scale of the development being proposed. If linkages are required off-site then it is legitimate for a developer to carry out the works (or to require a financial contribution to allow the works to proceed) provided it is in line with the policy tests and other requirements of Circular 1/10 Planning Agreements (S4_Doc_521).

Recycling is an integral consideration and requirement for all development, which should correspondingly relate in scale, nature, type and form to that which the development relates with careful consideration to place and use. This reflects national policy through Scottish Planning Policy (2010) (Core_Doc_048), including Sustainable Development paragraphs 37, 39 (S4_Doc_329) and Waste Management paragraph 213 (S4_Doc_799). This is also reflected regionally through Policy 2 (criteria d) (S4_Doc_066) and Policy 6 (S4_Doc_069) of TAYPlan 2012.

In a large development site such as referred to in Policy PM1C, requiring a wide range of infrastructure and facility requirements; recycling facilities can be effectively accommodated harmoniously in the wider development site through good site planning, resulting in no associated adverse impacts on neighbouring residential amenity. The Council do not therefore consider that recycling facilities within a development would necessarily cause bad neighbour issues which cannot be managed or planned for.

In both matters, no modification is proposed to the Plan.

Douglas Davidson (00743/3/001): The planning assessment process by its very nature, and in respecting and following both the associated development plan and supplementary guidance, assesses all development proposals in a sequential manner, including the development itself and surrounding existing or proposed property and features. This includes a range of considerations including air and noise quality assessments, flood risk assessments and other non-technical site specific assessments of landscape and visual character etc. The Council therefore considers that appropriate account relating to impact and effect on existing property and features is both integral and embedded within the development management assessment process without requiring a specific policy reference to sequential effects.

No modification is proposed to the Plan.

Theatres Trust (08819/1/002): The practicality of being more specific to the scale or nature as to what should be retained or integrated is considered by the Council to make this an unfeasible and unworkable criterion of the policy and would conversely contrast with the aims and objectives of placemaking.

This criterion seeks to highlight and establish from the outset, consideration of existing natural and built features which have the potential to support and augment an individual townscape. The preference is for the retention and integration of such features as part of a development proposal. In seeking to achieve site specific solutions and in respecting individual site characteristics, a one size or standard fits all approach to specifying what should or should not be retained and integrated into a development proposal would therefore be both inappropriate and unworkable. These elements need to be considered at the outset, as part of an initial site analysis; with this the most appropriate stage to specify what should or could be retained.

No modification is proposed to the Plan.

Scottish Natural Heritage (05211/1/001): The points made are noted, with no specific reference made to green infrastructure and green networks. The policy criteria of Policy PM1B is considered to tackle these points, albeit in a more generic fashion with reference to spaces and natural features. The specifics of the comments made are considered to be more appropriately dealt within The Natural Environment Section 3.9, which includes policy NE4: Green Infrastructure (S4_Doc_415). The Placemaking Guide supplementary guidance also includes dedicated sections on green infrastructure, networks and reference to landscape character.

If the Reporter was so minded to recommend that the proposed modifications are adopted, the Council would be comfortable with these modifications as they would have no consequential implications for any other aspects of the Plan.

Frank Moisey (09950/2/001): The overall intention of this requirement is understood and noted; however the proposal would conversely conflict with the intended outcome of Policy PM1C. Policy PM3 (S4_Doc_496) is considered to be worded in such a way to afford suitable flexibility in its application and could apply the intended outcome of the proposed lower threshold in this regard. Policy PM1C addresses a different approach to that of existing small settlements and communities, which already benefit from some degree of facilities and infrastructure. Policy PM1C is designed and intended for development scales that identifiably stand alone as an entity, meeting the key needs of its future residents with opportunities and facilities which address work, live and play requirements. Policy PM3 and associated supplementary guidance is therefore considered to already appropriately address the desired outcome of the proposed lowering of the 200 unit threshold as proposed in Policy PM1C and in this regard, the Council does not propose to amend this element of the Plan.

No modification is proposed to the Plan.

Homes for Scotland (10214/1/014): The Placemaking Guide is a dynamic set of guidance documents, which are ever evolving with the intention of regular review. The overarching aims of the guide are considered to remain consistent with 2010 Designing Streets: A Policy Statement for Scotland (Core_Doc_014) and not necessarily superseded by this national policy statement. As the guide evolves, its relevance should remain an up to date reflection of both national and local policy and guidance. The Council considers that references to the Placemaking Guide is consistent with national policy and guidance and therefore does not propose to omit this reference from the Plan.

No modification is proposed to the Plan.

PM2 Design Statements

John Dewar Lamberkin Trust (09166/8/001): Design statements and masterplans are two integral planning tools which the Council aim to employ in seeking to achieve the key aims and objectives of placemaking; particularly at the strategic site level, as highlighted and filtered down through the aims of Policy 2 (S4_Doc_066) and Policy 4 (S4_Doc_633) of TAYPlan. It is fully anticipated and understood that design statements will either be separately documented to supplement a strategic site masterplan or constitute the background material to a masterplan submission, effectively covering the key topic areas within a competent design statement. In addition, design statements are appropriately addressed through Policy PM2, whereby any site exceeding or meeting the threshold criteria, would require a design statement to be submitted. All masterplan submissions are therefore fully anticipated to include a design statement in an agreed format as a matter of course, complying with the suggestion.

No modification is proposed to the Plan

RD1 Residential Areas

Lynne Palmer (00239/9/001): Policy RD1 and the associated placemaking policy criteria broadly accords with the suggestion for effective land use, particularly in town and city centres. The specific nature and application of this is considered to be most effectively applied on an individual sites basis or as part of a strategic development proposal. Additional emphasis or specific reference to this matter is therefore not deemed necessary within this section of the Plan, but more appropriately tackled through design briefs, statements, masterplans and associated supplementary guidance.

No modification is proposed to the Plan

New Policy

Liz Hodgson (00853/1/001): Whilst no specific reference is made to community engagement within the Placemaking policy section, the Council are fully signed up to community engagement and democratic decision making within all levels of the planning process including the development of the Plan itself, through to the determination of individual planning applications. The Planning etc (Scotland) Act 2006 contains a strong emphasis on community engagement, to which the Council must adhere. Paragraph 24 Determining Planning Applications (S4_Doc_800) and Paragraphs 31 and 32 of Scottish Planning Policy 2010 (S4_Doc_801) directly addresses effective community engagement,. This also includes specific reference to PAN 81 Community Engagement (Core_Doc_212), which contains national standards for community engagement. As community engagement is therefore an integral element of the planning process already, it is considered this obviates the need for specific policy reference at this stage of the Plan.

No modification is proposed to the Plan.

Reporter's conclusions:Policy PM1A

1. The policy is very clear that development must contribute positively to the quality of the surrounding built and natural environment. It would not add anything to its effectiveness if it stated that greatest effects are likely to be experienced in close proximity to the site. The creation and/or improvement of links beyond site boundaries has potentially great significance for placemaking and is not, in principle, an unreasonable expectation of a new development scheme. It is quite common for off-site works to be developer-funded and, although the appropriateness of this is a matter to be assessed on a case by case basis, it is appropriate to highlight that this will be expected where practical.

Policy PM1B

2. It would be appropriate for this policy to make reference to the wider landscape as this is part of the context within which a development site would be experienced and is an important consideration even if there are no views, landmarks or skylines of particular importance. This would best be dealt with by an addition to criterion (b). Although green infrastructure and networks are dealt with in some detail in Policy NE4, such considerations are important to placemaking and should therefore also be referred to within the this policy. An additional criterion (h) would be the most logical point at which to refer to these.

3. It is not necessary for the policy to be more specific in respect of the existing buildings and other features that should be retained, as this will depend entirely upon the specific circumstances of the site in question. For similar reasons, it would also be inappropriate for the policy to incorporate a caveat specifying that the achievability of the stated objectives might be constrained by development viability issues. Such matters would best be dealt with on a site by site basis.

Policy PM1C

4. The threshold of 200 houses in this policy represents a development of sufficient scale to justify the expectation that a distinct and to some degree self-contained neighbourhood

would be created. Reducing the threshold to 100 units would be inappropriate, as it would be unrealistic to expect a development of that size to have the same degree of self-containment. And for a development of that size it is unlikely that the creation of a neighbourhood with its own sense of identity would be more appropriate than an approach that sought instead to integrate the development sympathetically with its surroundings. The threshold in this policy has no implications for the operation of Policy PM3, which deals with infrastructure contributions, as subject to any stipulations in supplementary guidance, that policy applies to development schemes of any scale.

5. Recycling centres are not inherently unsuitable features within a residential development of the scale to which this policy applies. Siting would of course be an important consideration but that is matter for resolution in a site's masterplan.

6. The authority's Placemaking Guide is intended to be an evolving document that will regularly be updated to reflect best practice. It is appropriate therefore for the policy to refer to this document as well as to Designing Streets, despite the latter being more recent than the most recent iteration of the former.

PM2 Design Statements

7. This policy is intended to apply to smaller scale development where a site masterplan would not be appropriate or necessary, as well as to the strategic development sites. As it is important to identify the design justification behind development proposals of all scales it is necessary to have a policy of this nature and there would be no benefit in it specifying that for the strategic sites, the design statement should form an integral element of the site's masterplan.

RD1 Residential Areas

8. The purpose of Policy RD1 is to ensure that development maintains the amenity of established residential areas. While it is important to have regard to the density of development in the surrounding area, it is not necessarily essential for the development density of infill residential schemes to be similar to its environs. It is important that land within established residential areas is used efficiently and the policy would benefit from setting out the need to make the most efficient use of development land while protecting the amenity of the area.

New Policy

9. The planning authority is obliged by legislation to engage with residents and other stakeholders throughout the planning process. The addition of a policy which confirmed this would not alter the statutory position and could only offer any greater opportunity for public engagement if the policy committed the authority to a greater level of engagement than is required by law. SPP sets out the government's clear commitment to community engagement but also requires the planning system to operate efficiently and avoid delays. There is no evidence that existing statutory requirements fail to strike an appropriate balance between these objectives and there are therefore no grounds to introduce a policy which prioritised public engagement over the speed and efficiency of the planning system.

Reporter's recommendations:Policy PM1B

1. Modify criterion (b) to read as follows:

“Consider and respect site topography and any surrounding important landmarks, views or skylines, as well as the wider landscape character of the area.”

2. Add an additional criterion (h) to read as follows:

“Incorporate green infrastructure into new developments and make connections where possible to green networks.”

RD1 Residential Areas

3. Modify category (a) to read as follows:

“Infill residential development at a density which represents the most efficient use of the site while respecting its environs.”