

Issue 20e		HMA Specific Housing Strategy Issues	
Development plan reference:		5.1 - Perth Area Spatial Strategy, page 67-71 6.1 – Highland Perthshire Area, page 151-153 7.1 – Kinross-shire Area, page 197-199 8.1 – Strathearn Area, page 239-241 9.1 – Strathmore and the Glens Area, page 273-275	Reporter: Hugh M Begg
Body or person(s) submitting a representation raising the issue (including reference number):			
Ian Steel (00214) Peter Williamson (00302) Susan Fraser & Alison Ramsay (00390) Susane Hogarth (00429) Patricia Timto (00523) Stewart Milne Homes (00659) Inchtute Community Council (00701) John Brady (00719) E J Baxter (00729) Ross Gardiner (00757) Fossoway & District Community Council (00830) Jim Farquharson (01036) Friends of Rural Kinross-shire (05105) R J A Exley (08087) I L Steven (08733) Zurich Assurance Ltd (08816) Shand Partnership (09010)		Matthew Pease Architect (09125) Muir Homes Ltd (09035) George Maxwell Builders (09071) Jim Pritchard (09104) John Dewar Lamberkin Trust (09166) Methven & District Community Council (09221) Kinross Estate Company (09313) Duncan Scott (09389) Mr & Mrs Allan Allanson-Oddy (09401) Lomond Land (09415) James Watt (09435) Blairgowrie & Rattray Community Council (10002) Homes for Scotland (10214) David Wilson Homes (10227) John Munro (10277) Mr & Mrs R Gardiner (10280)	
Provision of the development plan to which the issue relates:		Housing strategies relating to individual housing market areas	
Planning authority’s summary of the representation(s):			
<p><u>Perth Housing Market Area</u></p> <p>George Maxwell Builders (09071/1/002): The LDP should have adopted MIR option 2 (MIR pages 71-75 (S4_Doc_219)) which would have allocated an additional 210 houses in villages beyond the green belt. This plus a modest increase in numbers outwith the Perth Core Area would not conflict with TAYplan (Core_Doc_099).</p> <p>Zurich Assurance Ltd (08816/12/001): Object to the allocation of such a large proportion of the first 10 years housing land supply in the Perth housing market area to sites reliant on the Cross Tay Link Road at the expense of deliverable land at Stanley.</p> <p>Duncan Scott (09389/4/002): The Perth Area spatial strategy is flawed. The 2011 Housing Land Audit (Core_Doc_047) shows sites in Perth are not delivering but sites in the Perth landward area are. The delivery of housing land can be enhanced by directing more of the requirement to landward settlements without undermining the TAYplan strategy (Core_Doc_099).</p>			

Jim Farquharson (01036/1/001): If TAYplan (Core_Doc_099) and the LDP need to be reassessed in light of Perth's City status the Carse of Gowrie should be positively assessed as it has the potential to provide education facilities, a rail park and ride, increase employment opportunities, and save future pressure on conservation villages. The Carse never floods and the available land is grade 3(2) not grades 1 and 2 as identified elsewhere.

I L Steven (08733/1/001): Concerned that there is little demand for new private housing proposed around Perth, Scone, Almondbank and Bridge of Earn.

John Munro (10277/1/004): Government and Perth & Kinross Council policies emphasise close relationships between land use/densities and transport with housing being located where there will be good pedestrian, cycle and/or public transport access to places of work, shopping, recreation, education etc and making better use of existing infrastructure and services. The strategy for the Perth Area does not adequately do this.

Lomond Land (09415/8/001): The Perth Core Area boundary is illogically and too tightly drawn in a southerly direction between Stanley and Balbeggie. It should be extended to include settlements along the A93. These settlements interact and relate to one another and are predominantly part of the Perth hinterland. Any development in these settlements would contribute to the housing land supply and the general development of Perth and not compete with the strategic development areas.

Homes for Scotland (10214/1/033): The diagram of the Perth Core Area on LDP page 67 does not clearly indicate anything.

James Watt (09435/1/002); Peter Williamson (00302/1/002); John Dewar Lamberkin Trust (09166/4/001); Inchtute Community Council (00701/1/004); R J A Exley (08087/1/001); Methven & District Community Council (09221/1/021): Support the Plan as written. Susan Fraser & Alison Ramsay (00390/1/003): Support the definition of the Perth Core Area

Highland Housing Market Area

Mr & Mrs R Gardiner (10280/1/001); Ross Gardiner (00757/1/001): Object to the large number of houses proposed for Pitlochry on greenfield sites. This will have an unacceptable impact on character and landscape. Question the likelihood of adequate infrastructure being put in place to service additional houses and school capacity.

Patricia Timto (00523/1/001); Ross Gardiner (00757/1/001): Question the need for the additional housing development proposed for the Highland area.

Kinross Housing Market Area

David Wilson Homes (10227/1/006 & 10227/1/015): A higher proportion of new housing should be directed to Kinross/Milnathort rather than peripheral areas to ensure an effective supply. These are the largest settlements in the housing market area with greatest access to existing infrastructure and services and more likelihood of development. Supply in the landward area should be considered against high demand in Kinross/Milnathort. A reliance on the landward area creates oversupply there and does not solve the problems with delivery in Kinross/Milnathort. Kinross/Milnathort should therefore be considered separately to the landward area.

Kinross Estate Company (09313/9/002): The balance of the Kinross housing market area allocations in the tables on LDP pages 198 and 199 should be reassessed to ensure 75%

of the requirement is met within Kinross/Milnathort and only 25% to the Landward area.

Mr & Mrs Allan Allanson-Oddy (09401/1/001): The draft TAYplan MIR paragraph 9.6 (it is assumed this refers to the TAYplan MIR paragraph 9.6 (S4_Doc_596)) prefers strategy A: only in exceptional circumstances should development be permitted in Kinross landward area. It is not clear from the LDP if there are any exceptional circumstances so sites A, C, D & E from the LDP MIR (it is assumed this refers to LDP MIR pages 117-119 (S4_Doc_220)) should be considered. The erection of 90 new houses would substantially change the character of Powmill, would be contrary to the draft TAYplan (Core_Doc_002), and would increase traffic volumes.

Friends of Rural Kinross-shire (05105/1/002); Susane Hogarth (00429/1/001 & 00429/1/002); John Brady (00719/1/001); Matthew Pease Architect (09125/1/007): Object to a significant proportion of the landward housing land requirement being allocated to Powmill for some or all of the following reasons: the number is excessive and will double the size of the settlement; the allocation to Powmill should be reduced with the balance allocated at Blairingone; there does not appear to be a corresponding increase in infrastructure other than extension of Fossoway primary school; Fossoway and Portmoak schools may not have capacity to accommodate additional children; community facilities in Powmill do not support a large development – new facilities will not necessarily be provided as a result of the development; additional development would change the status of 'village'; there is little existing or prospect of new public transport provision meaning increased noise and pollution levels from additional cars; question whether it is really necessary; lack of water pressure will be exacerbated by additional houses and must be researched prior to any building; housing should be distributed along the A977 to spread the impact and increase consumer choice; in the absence of facilities for employment, education, shopping and recreation the development will just generate increased commuting; and MIR option 1 was the preferred option by a majority of respondents yet LDP proposes option 2 (LDP MIR pages 117-121 (S4_Doc_220)) in order to avoid development in Loch Leven Catchment and because of possible mine workings around Blairingone but these issues should've been known at MIR stage. Comments specific to site H53 are discussed in Schedule 4 no.35b – Kinross-shire Area – West Settlements with Proposals.

Shand Partnership (09010/1/004): LDP paragraph 7.1.11 states that residential development will be located to the larger villages in the area. Crook of Devon is one of the largest villages but no development is allocated. Most is directed towards Powmill which does not have services and will require Greenfield development. It is considered that the distribution of at least 50% of the Powmill allocation to other settlements in the HMA such as Crook of Devon would provide a better strategy in terms of sustaining the vitality of a number of settlements in the HMA rather than just one village.

E J Baxter (00729/1/003); Fossoway & District Community Council (00830/1/002); Jim Pritchard (09104/1/011 & 09104/1/013): Support the Plan as written.

Strathearn Housing Market Area

Stewart Milne Homes (00659/5/001); Muir Homes Ltd (09035/5/001): Object to the balance of land allocation between Crieff and Auchterarder. Stewart Milne Homes (00659/5/001): Auchterarder is preferable because of its strategic importance and marketability, it is supported by TAYplan section 4.2 (it is assumed this refers to TAYplan policy 1 (S4_Doc_067)), housing demand in Strathearn area is greatest in Auchterarder, failure to allocate additional land will limit the growth potential of the existing economy, it is more accessible, infrastructure provision in the Auchterarder area could be helped by

additional allocations, and the Community Council is reported to be supportive. Muir Homes Ltd (09035/5/001): The potential contribution of Auchterarder to the housing land supply has been underestimated. The LDP needs to think ahead regarding how the future development of Auchterarder, during the next 15-25 years, might best be achieved in terms of the proper planning of the settlement as a whole and in terms of the provision and funding of infrastructure. Sites suggested at MIR stage have been assessed in a disappointing manner; alternative sites suggested should be included.

Methven & District Community Council (09221/1/029): Estate water supply in the Logiealmond District is not reliable enough and a modern water supply is needed to achieve modern infrastructure standards.

Strathmore Housing Market Area

Blairgowrie & Rattray Community Council (10002/1/001 & 10002/1/004): Object to the number of new houses proposed for Blairgowrie. This is disproportionate, will bring various infrastructure and supply problems, and will not contribute to the regeneration of the town. There are already too many unsold houses. Concentrating development on vacant sites in the existing town envelope rather than on the periphery will help regenerate the town centre.

Ian Steel (00214/1/003): The housing requirement for Blairgowrie is unrealistic and needs to take into account the current housing market. Less people will commuting to Perth and so less houses will be needed. Building on greenfield sites will change the rural character of the area.

Modifications sought by those submitting representations:

Perth Housing Market Area

George Maxwell Builders (09071/1/002): Spatial strategy should be amended to increase housing land allocations in Perth Area, specifically that part within the Dundee HMA. An additional land release should be programmed for Longforan.

Zurich Assurance Ltd (08816/12/001): Objects to the redistribution of housing land within the Perth Core with a significant proportion of housing land reliant on the Cross Tay Link Road and other infrastructure, which may not be delivered in the specified period. Increased allocation sought for Stanley.

Duncan Scott (09389/4/002): More of the Perth Area housing land requirement should be directed to the landward settlements.

Jim Farquharson (01036/1/001): No specific modification sought other than the Carse should be reconsidered for development.

I L Steven (08733/1/001): No specific modification sought but implied that the housing numbers proposed for the Perth Housing Market Area are too high.

John Munro (10277/1/004): No specific modification sought but suggested that the Perth Area strategy does not have a close enough relationship between land use/densities and transport.

Lomond Land (09415/8/001): The Perth Core Area boundary should be extended along the A93 to include the settlements of Guildtown, Dunsinnan, St Martins, Wolfhill, and Newlin (it is assumed this should read Newmiln).

Homes for Scotland (10214/1/033): The diagram on LDP page 67 should be removed or replaced with an Ordnance Survey based plan which clearly shows what the Perth Area spatial strategy is.

Highland Housing Market Area

Mr & Mrs R Gardiner (10280/1/001): Reduce number of dwellings proposed in Pitlochry. No specific number is suggested.

Patricia Timto (00523/1/001): Amend Spatial Strategy to clarify the need for further housing.

Ross Gardiner (00757/1/001): Reduce number of houses to be built in Highland Perthshire and Pitlochry in particular. No specific number is suggested.

Kinross Housing Market Area

David Wilson Homes (10227/1/006): 90% of housing supply in Kinross housing market area should be provided in the Kinross/Milnathort settlements.

David Wilson Homes (10227/1/015): Kinross and Milnathort should be considered separate to the Kinross landward area in terms of housing land supply.

Kinross Estate Company (09313/9/002): The balance of the Kinross housing market area allocations in the tables on pages 198 and 199 should be 75% within Kinross/Milnathort and only 25% to the Landward area.

Mr & Mrs Allan Allanson-Oddy (09401/1/001): LDP should adopt option 1 for Kinross-shire as set out in the MIR (S4_Doc_220).

John Brady (00719/1/001): Proposal for 120 houses at Powmill should be reconsidered. It is not stated but assumed that the size of the site should be reduced in line with the MIR option 1.

Friends of Rural Kinross-shire (05105/1/002): Some of the housing proposed at Powmill should be moved to Blairingone and some to the eastern side of Kinross-shire. There should be significant provision of infrastructure in Powmill taking into account what local people want and what the developer will offer.

Susane Hogarth (00429/1/001); Susane Hogarth (00429/1/002): Housing development should be spread along the A977 e.g. Blairingone, Powmill, Rumbling Bridge, Crook of Devon rather than concentrated in Powmill.

Matthew Pease Architect (09125/1/007): Reduce the housing numbers at Powmill and transfer the balance to Blairingone.

Shand Partnership (09010/1/004): Distribute 50% of the allocation in Powmill between a range of settlements including Crook of Devon.

Strathearn Housing Market Area

Stewart Milne Homes (00659/5/001): Auchterarder should be preferred to Crieff for major development. Additional housing land allocations should be identified in Auchterarder. Fewer allocations should be considered for Crieff. Specific numbers are not suggested in the representation.

Muir Homes Ltd (09035/5/001): Amend plan to provide more housing land in Auchterarder, particularly sites promoted by Muir Homes; and less housing land in Crieff. Specific numbers are not suggested in the representation.

Methven & District Community Council (09221/1/029): Amend Plan to embargo residential development proposals in Logiealmond area, especially at Chapelhill and Harrietfield, until a public water supply is available.

Strathmore Housing Market Area

Blairgowrie & Rattray Community Council (10002/1/001): The Council should reduce the number of houses proposed for the Blairgowrie area. Specific numbers are not suggested in the representation.

Ian Steel (00214/1/003): The housing land requirement for Blairgowrie should be re-assessed. Specific numbers are not suggested in the representation.

Blairgowrie & Rattray Community Council (10002/1/004): New housing quota should be allocated within the existing Blairgowrie town envelope before considering any greenfield sites.

Summary of responses (including reasons) by planning authority:

Perth Housing Market Area

George Maxwell Builders (09071/1/002); Duncan Scott (09389/4/002): In accordance with TAYplan policy 1 (S4_Doc_067) the LDP directs the majority of the housing land allocation to tier 1 settlements i.e. those settlements within the Perth Core Area, and thereafter to tier 2 and 3 settlements. There are no tiered settlements in the Perth HMA outwith the Core Area. George Maxwell Builders (09071/1/002): MIR option 1 is therefore more in accordance with the TAYplan strategy than option 2 (LDP MIR pages 71-75 (S4_Doc_219)) which directed more growth outwith the Core Area and beyond the Green belt. Longforgan is outwith the Core Area (LDP page 67) and is not a tiered settlement therefore any significant allocation there would conflict with the TAYplan strategy.

No modification to the Plan is proposed.

Zurich Assurance Ltd (08816/12/001): TAYplan policy 1 (S4_Doc_067) requires LDPs to allocate the majority of development to the regions principal settlements. Whilst Stanley is within the tier 1 Perth Core Area (LDP page 67) there is already a considerable amount of housing development proposed for the settlement (LDP page 147 (S4_Doc_503)). It is not therefore considered likely that any increase in land allocations in Stanley would deliver an increase in effective housing land supply during the life of the Plan. The Plan strategy requires a package of transport infrastructure works and this affects all sites in the Perth HMA to a greater or lesser extent. The Plan however includes site specific constraints related to certain key projects e.g. the Cross Tay Link Road. Those sites identified in the LDP which are in some way dependent on the Cross Tay Link Road are considered effective, albeit in the latter part of the Plan period, and this is addressed in detail in Schedule 4 no. 20d - Effectiveness of Strategic Sites and in the Council's Delivering Infrastructure Background Paper (S4_Doc_440). The distribution of the housing allocation within the Perth Core Area is considered appropriate.

No modification is proposed to the Plan.

Jim Farquharson (01036/1/001): TAYplan (Core_Doc_099) was approved by Scottish Ministers in June 2012. Perth's new city status does not alter the spatial strategy of either TAYplan or the LDP. The LDP has to accord with the Strategic Development Plan which specifically presumes against development in the Carse of Gowrie area (TAYplan policy 5c (S4_Doc_062) and as shown on (S4_Doc_447)).

No modification is proposed to the Plan.

I L Steven (08733/1/001): The TAYplan examination Reporter did not amend the Housing Land Requirement but instead concluded that there was no clear evidence which could reasonably lead him to conclude that the regional build rate provided for in the proposed Strategic Development Plan was either inappropriate or insufficient. (TAYplan examination report page 220 paragraph 15 (S4_Doc_597)). The LDP has to accord with TAYplan and it is not therefore appropriate to make amendments to reduce the housing land requirement in the LDP.

No modification is proposed to the Plan.

John Munro (10277/1/004): The Council disagrees with the comments made. The large scale development proposals within the Perth Core Area are the ideal opportunity to create sustainable neighbourhood developments with a mix of land uses to reduce travel distances to facilities, services and places for work thus maximising opportunities for public transport use in line with LDP Policy TA1B (S4_Doc_387).

No modification is proposed to the Plan.

Lomond Land (09415/8/001): The Perth Core Area and the settlements included within it are defined by TAYplan policy 1 (S4_Doc_067). The LDP has to accord with the Strategic Development Plan. Unlike the settlements specified in TAYplan policy 1 the settlements referred to in the representation (as shown in S4_Doc_600) are not considered to be of a sufficient scale in terms of size or provision of services/facilities to have the potential to contribute significantly to accommodating the Perth and Kinross share of the TAYplan housing land requirement or to make a major contribution to the economy.

No modification is proposed to the Plan.

Homes for Scotland (10214/1/033): The diagram of the Perth Core Area on page 67 is the same as that in TAYplan Policy 1 (S4_Doc_067). It is intentionally diagrammatic as it simply aims to give an indication of the general location of the settlements within the Core Area in relation to Perth itself. Use of an ordnance survey base could suggest that any site within the boundary line would be favourably considered for development being within the Core Area. This is not the case – it is only those settlements specified in TAYplan Policy 1 where development is directed.

No modification is proposed to the Plan.

Highland Housing Market Area

Patricia Timto (00523/1/001); Ross Gardiner (00757/1/001): The housing land requirement was informed by the TAYplan Housing Needs and Demand Assessment (Core_Doc_190) which considered the needs and requirements for affordable and market housing across the whole TAYplan area. Mr and Mrs R and L Gardiner (10280/1/001) and Mr Ross Gardiner (00757/1/001): The TAYplan examination Reporter did not amend

the housing land requirement concluding that a reduction in build rates would not provide for a generous supply of housing land which would be inconsistent with SPP (TAYplan examination report page 221 paragraph 17) (S4_Doc_598). The LDP has to accord with TAYplan and it is not therefore appropriate to make amendments to reduce the housing land requirement in the LDP for the Highland HMA.

Mr & Mrs R Gardiner (10280/1/001); Ross Gardiner (00757/1/001): TAYplan policy 1 (S4_Doc_067) directs the majority of development to principal settlements as these are the places which are already best served by local services and employment opportunities and where the best public transport connections are found. In the Highland HMA the principal settlements are Aberfeldy, Dunkeld / Birnam and Pitlochry however no allocations have been made in the LDP for Dunkeld / Birnam due to the significant constraints to development there. The majority of growth is directed to Aberfeldy but it is considered appropriate to also direct a proportion of the growth to Pitlochry given it too is a tier 3 settlement and is also considered to have scope to accommodate additional development over the life of the Plan. Mr and Mrs R and L Gardiner (10280/1/001): The impact of development on the landscape and character of the town will be assessed against LDP policies such as policy ER6: Managing Future Landscape Change (S4_Doc_397), whilst policy PM3: Infrastructure Contributions (S4_Doc_496) will ensure the impact of development on infrastructure or facilities such as school capacity is taken into account. Concerns regarding the development of greenfield sites are acknowledged however as is recognised in LDP paragraph 4.3.12 (S4_Doc_492) the availability of brownfield land in Perth and Kinross is extremely limited; there were only 50 hectares of derelict and urban vacant land in Perth and Kinross in 2011 (Scottish Vacant and Derelict Land Survey return 2011 (S4_Doc_606)). This leaves little option but to accommodate at least some development on greenfield sites. Taking all of the above into account it is considered appropriate to allocate a proportion of the housing land requirement to Pitlochry as identified in the Plan.

No modification is proposed to the Plan.

Kinross Housing Market Area

David Wilson Homes (10227/1/006); Kinross Estate Company (09313/9/002): The majority of the housing land supply in the Kinross housing market area is in the main settlements of Kinross and Milnathort. This is in line with TAYplan Policy 1 (S4_Doc_067) and equates to approximately 63% (calculated from the total effective supply as shown on page v of the Housing Land Audit 2012 (S4_Doc_599)). In the landward area more than half of the sites in the housing land supply are existing sites which already have planning consent. Of the additional allocations the only new housing sites in the landward area are at Powmill and a small site at Scotlandwell. These were identified to offer choice of location and to support the growth of the rural area. Both these sites are considered effective in the period to 2024. In contrast a significant proportion of the Kinross and Milnathort sites are new allocations. The Council believes that the balance between the main settlements and the landward area in the Kinross housing market area is appropriate.

No modification is proposed to the Plan.

David Wilson Homes (10227/1/015): In accordance with SPP (paragraph 67) (S4_Doc_313) the housing land requirement and supply is calculated at housing market area level. It is not therefore considered appropriate to consider the settlements of Kinross and Milnathort separately from the landward area in terms of housing requirement and land supply.

No modification is proposed to the Plan.

Susane Hogarth (00429/1/001 & 00429/1/002); John Brady (00719/1/001); Friends of Rural Kinross-shire (05105/1/002); Mr & Mrs Allan Allanson-Oddy (09401/1/001); Matthew Pease Architect (09125/1/007); Shand Partnership (09010/1/004): The concentration of a sizeable proportion of the landward area housing land allocation in one settlement offers more scope to achieve a level of growth which would result in improved services and facilities which would benefit not only the settlement itself but also other smaller communities in the area. The Council therefore opted to identify development in line with MIR Option 2 (pages 120-121 (S4_Doc_220)). Two possible locations were identified: Powmill and Crook of Devon. As mentioned in LDP paragraph 7.1.12 the settlement strategy for Kinross/Milnathort and the Fossoway area was informed by the Long Term Development Strategy (Core_Doc_054) developed by a community based group. This identified a strong preference for the Powmill site where the principle of development was already established through an existing planning consent. Schedule 4 no. 35b considers the Powmill site in more detail and Schedule 36 the Crook of Devon site. It is not therefore considered appropriate to redistribute some of the housing land allocation to other settlements along the A977 (as shown in S4_Doc_448) as suggested in the representations. Regarding Blairingone specifically, as indicated in Schedule 4 no. 35b the Council would have no issues with the identification of a site for 30 units but would not support these being identified as being part of the effective housing supply.

No modification is proposed to the Plan.

Strathearn Housing Market Area

Stewart Milne Homes (00659/5/001); Muir Homes Ltd (09035/5/001): It is recognised that Auchterarder is an area of high demand however the Council disagrees that the failure to allocate further land in this LDP will limit the growth potential of the existing economy or that insufficient consideration has been given to the proper planning of the settlement as a whole. There is already a significant allocation of effective housing land in Auchterarder, at the Development Framework and Op20 sites (LDP page 247 (S4_Doc_504)), which is considered more than adequate to meet demand until beyond the period of this LDP. This will however be kept under review through the annual Housing Land Audit and if necessary updated through the bi-annual Action Programme. The programming of the housing sites in Auchterarder is considered realistic and achievable and there are concerns that the allocation of additional sites could risk an oversupply in this location to the potential detriment of housing delivery in other settlements. In terms of the significance of Auchterarder in comparison with Crieff it should be noted that whilst Auchterarder is identified in TAYplan Policy 1 (S4_Doc_067) as a tier 3 settlement, Crieff is tier 2. Improved community and commercial facilities are also planned for Crieff. Given the higher tier status of Crieff in TAYplan and the fact that there is already a significant land supply in Auchterarder it is considered appropriate that the majority of additional allocations in the Strathearn area are directed to Crieff. Muir Homes Ltd (09035/5/001): Regarding the suggestion that the LDP needs to consider the future development of Auchterarder over the next 15-25 years, such longer term planning is a function of the Strategic Development Plan not the LDP.

No modification is proposed to the Plan.

Methven & District Community Council (09221/1/029): Neither Chapelhill nor Harrietfield (as shown on S4_Doc_449) have a settlement boundary identified in the LDP. Additional housing development in these small settlements would therefore fall to be assessed against LDP Policy RD3 Housing in the Countryside (S4_Doc_418) and the associated

supplementary guidance which requires that satisfactory services should be available or capable of being provided by the developer. It is considered that drainage issues such as those raised in the representation are most appropriately addressed through this policy and it is not therefore necessary to impose an embargo on development as suggested.

No modification is proposed to the Plan.

Strathmore Housing Market Area

Blairgowrie & Rattray Community Council (10002/1/001); Ian Steel (00214/1/003): In line with TAYplan Policy 1 (S4_Doc_067) most growth in the Strathmore area is directed to Blairgowrie / Rattray being tier 2 settlements with smaller allocations to the tier 3 settlements of Alyth and Coupar Angus. Tier 2 settlements are identified in TAYplan as having scope to make a major contribution to the TAYplan region economy whereas tier 3 settlements are seen as having a more modest role where growth is more about sustaining them. The LDP MIR (paragraph 5.6.7) (S4_Doc_221) identifies flooding constraints in Coupar Angus which restricts the amount of additional development that could be safely accommodated. Furthermore much of the landward part of the Strathmore area is also constrained by the need to reduce phosphorous inputs to the Lunan Valley Lochs. It is therefore considered appropriate to direct the most growth to the main settlement of Blairgowrie where local services, employment and transport are concentrated and where waste water can be best dealt with.

No modification is proposed to the Plan.

Blairgowrie & Rattray Community Council (10002/1/004); Ian Steel (00214/1/003): The LDP MIR (paragraph 5.6.9) (S4_Doc_221) specifically notes that it is unlikely that a significant number of houses can be accommodated on brownfield land within Blairgowrie. Whilst the benefits of developing brownfield sites in terms of assisting regeneration of the town centre are recognised, it is generally the case that such sites often come with abnormal development costs, i.e. demolition, cleaning up of contamination etc. These additional burdens may affect the viability of sites, particularly in the current economic climate. The majority of new development will therefore most likely be on greenfield land.

No modification is proposed to the Plan.

Reporter's conclusions:

A review of the representations summarised by the council and presented as this Issue 20e confirms that many of the matters raised are closely related to those dealt with elsewhere in this report with consequent recommendations. Accordingly, in the interests of brevity and clarity these matters not dealt with here.

Perth Housing Market Area

1. TAYplan, including the housing land requirement, has been approved by Scottish Ministers. Its Policy 1 sets out the location priorities which the local development plan is bound to follow. There are no principal settlements in the Perth Housing Market Area outwith the Perth Core Area. It has been found that there is sufficient land within Tier 1 settlements to meet the requirements of Policy 1. Moving on from there, Policy 5: Housing at item C requires that the Proposed Plan ensures a presumption against land releases in the Carse of Gowrie. Longforgan is not a principal settlement and it is located within the Carse. In any event, housing allocations there would be within five kilometres

of the Dundee Western Gateway and would be likely to prejudice the development of that strategic development area contrary to the requirements of Policy 5: Housing. These and related matters are dealt with under Issue 27.

2. Stanley is located within the Perth Core Area. Housing allocations there are not restricted by the deliverability of the Cross Tay Link Road. This matter is considered in detail elsewhere in this report at Issue 25a.

3. All proposals for new development during the life of the Proposed Plan will be assessed against the policies of the development plan including Policy TA1B of that plan and any other material considerations.

4. The settlements along the A93 lie outside of the Perth Core Area. Allocations to small settlements within the Perth hinterland rather than within the Core Area will increase rather than decrease the need to travel to work, for shopping and to access the array of services not provided within settlements of this size. That would run contrary to the policies of the development plan.

5. It is intended that the strategic development plan (TAYplan) and the local development plan (the Proposed Plan) should be read in tandem. The council has acknowledged that the diagram of the Perth Core Area on page 67 is identical to that in TAYplan Policy 1. It is not site specific and it adds nothing to the reader's understanding of the Perth spatial strategy.

Highland Housing Market Area

6. The housing land requirement for the Highland Housing Market Area is set out in TAYplan and that was informed by the TAYplan Housing Needs and Demand Assessment. Neither of these documents is before this Inquiry and, consequently, no conclusions can be drawn.

7. The allocation of sites for housing within Pitlochry and its vicinity is dealt with under Issue 28c.

Kinross Housing Market Area

8. As noted above, TAYplan, including the housing land requirement, has been approved by Scottish Ministers. Its Policy 1 sets out the location priorities which the Proposed Plan is bound to follow. Kinross / Milnathort is identified as a tier 2 settlement: i.e. one which has the potential to make a major contribution to the regional economy of the TAYplan area. It has been explained under Issue 20c why it is appropriate that there should be a 10% reallocation from the Kinross Housing Market Area to the Perth Housing Market Area. The role of Kinross/Milnathort has been recognised in the council's allocations of housing land and, indeed, in all other related matters. These and related matters are dealt with under Issues 31-34.

9. There is no policy support for a dispersal of housing sites along the A977 at Blairingone, Powmill, Rumbling Bridge, and Crook of Devon none of which are principle settlements. These and related matters including the proposed allocation of housing land at Powmill are dealt with under Issues 35b and 36.

Strathearn Housing Market Area

10. Policy 1 of TAYplan identifies Crieff as a Tier 2 settlement and Auchterarder as a Tier 3 settlement. On that basis, all other things being equal, contrary to the representations, Crieff should be preferred to Auchterarder for housing allocations. Matters arising from the proposed allocations in these settlements are dealt with in Issues 38 and 37 respectively.

11. The council is correct in pointing out that neither Chapelhill nor Harrietfield has a settlement boundary identified in the Proposed Plan. Applications for residential development will be assessed against Policy RD3 Housing in the Countryside and any relevant supplementary guidance. Accordingly, there is no need to give consideration to the introduction of an embargo within the Proposed Plan as advocated by Methven & District Community Council.

Strathmore Housing Market Area

12. TAYplan Policy 1 identifies Blairgowrie / Rattray as a tier 2 settlement with Alyth and Coupar Angus as Tier 3 settlements. Accordingly, all other things being equal, the former is to be preferred to the latter when it comes to allocating sites to meet the housing land requirement. The council has pointed to the advantages of Blairgowrie / Rattray in terms of the provision of local services, employment and transport and the treatment of waste water. Likewise there are constraints on development which have been identified elsewhere in the housing market area. Allocations in Blairgowrie / Rattray and the immediate vicinity are dealt with under Issue 42.

13. Scottish Planning Policy (SPP) makes it clear at paragraph 80 that: “*Redevelopment of urban and rural brownfield sites is preferred to development on greenfield sites.*” The council has acknowledged the benefits of developing brownfield sites in terms of assisting regeneration of the town centre. Whatever may be the difficulties to be addressed in Blairgowrie and, indeed elsewhere in Perth and Kinross, the council is bound to recognise and then act upon the thrust of national policy and the clearly stated preference for brownfield development before greenfield land release.

Reporter’s recommendations:

1. Delete the diagram incorporated within paragraph 5.1.1. As a consequential amendment, for continuity, insert bullet points in advance of each of the settlements listed as being part of the Perth Core Area.