

Issue 20f	Greenfield Land and Housing Density	
Development plan reference:	4.3.12 and 4.3.13 (including table) - Greenfield Land and Housing Density, page 64 & 65	Reporter: Hugh M Begg
Body or person(s) submitting a representation raising the issue (including reference number):		
Martin Pettinger (00246) Councillor Michael Barnacle (02633) Persimmon Homes East Scotland (09004/19) Taylor Wimpey UK Ltd (09004/23) Homes for Scotland (10214) John Munro (10277)		
Provision of the development plan to which the issue relates:	Proposed housing density ranges	
Planning authority's summary of the representation(s):		
<p>Homes for Scotland (10214/1/030): Various density ranges are tabulated but there is no further obvious link to development sites. Within the individual settlements no reference is made to the required densities although total units are specified. Scottish Government's Designing Streets Policy (Core_Doc_014) will indicate density along with good design. This section is not required.</p> <p>Councillor Michael Barnacle (02633/1/027): Vigorously oppose housing density ranges at LDP paragraph 4.3.13. It is irrefutably the case that accepting the unsustainable level of growth in Perth &amp; Kinross Council's Single Outcome Agreement (Core_Doc_100) forces choices between increasing housing density and the irrevocable loss of prime agricultural land. It is vital that prime land is retained for food production and has more robust policy protection.</p> <p>Martin Pettinger (00246/4/001): The housing numbers given for each housing site are estimates and not fixed. Stating numbers in the Plan could be used by developers to over-develop sites.</p> <p>Persimmon Homes East Scotland (09004/19/001); Taylor Wimpey UK Ltd (09004/23/001): It would be efficient use of Greenfield land within settlements to encourage increased densities where this may be compatible with the form and layout of the settlement and be of high accessibility (refers SPP paragraph 80 and 83 (S4_Doc_099) and (S4_Doc_310)). Rather than adhere to the flexible density ranges at LDP paragraph 4.3.13 where flexibility within the range would be assessed on a case by case basis, the LDP should encourage future development via planning applications and/or development briefs for sites where it will be up to the developer to demonstrate and justify any reasoning for the application of higher densities.</p> <p>John Munro (10277/1/012): The LDP recognises varying housing densities are appropriate but does not explain which densities would apply where. The LDP should at least state which density categories apply to which kinds of locations. Refers to the former SPP17 (S4 Doc 299) which states highest densities should apply to places with</p>		

good pedestrian, cycle and/or bus access to work, education etc. These would be close to service centres, major bus routes etc.

#### **Modifications sought by those submitting representations:**

Homes for Scotland (10214/1/030): Paragraph 4.3.13 and associated table should be deleted.

Councillor Michael Barnacle (02633/1/027): Not stated but is assumed that the housing densities at paragraph 4.3.13 and associated table should be deleted.

Martin Pettinger (00246/4/001): Wording should be changed to reflect that housing numbers given for each housing site are estimates of what may be possible subject to detailed site investigations including transport studies, flood studies and third party consultations.

Persimmon Homes East Scotland (09004/19/001) and Taylor Wimpey UK Ltd (09004/23/001): Last sentence of paragraph 4.3.12 should be reworded as follows: *'This can be achieved through higher density development where it can be demonstrated this is compatible with the form and layout of the settlement and has high accessibility to local services'*.

John Munro (10277/1/012): The LDP should state which housing densities apply to which kinds of location.

#### **Summary of responses (including reasons) by planning authority:**

Homes for Scotland (10214/1/030); Councillor Michael Barnacle (02633/1/027): LDP paragraphs 4.3.12 – 4.3.13 highlight that the availability of brownfield land in Perth and Kinross is extremely limited. The pressure for new development will therefore largely be on Greenfield land, much of which is prime agricultural land which is an important resource and therefore needs to be used sparingly. This can be achieved through higher density development. The MIR recognised one approach would be to apply a standard density across the whole area but this it was felt could inhibit the ability to reflect local character (MIR paragraph 4.2.16 (S4\_Doc\_215)). Research was undertaken at MIR stage to identify appropriate density ranges which were wide enough to allow a reasonable degree of flexibility. These ranges were used to inform the indicative housing numbers for each of the housing proposals in the Plan. Regarding the link between the density ranges identified in the table at paragraph 4.3.13 and development sites it is acknowledged that the current Kinross Area Local Plan does identify a separate column for each site which gives an indication of the expected density i.e. low, medium or high (e.g. page 53 (S4\_Doc\_555)). Given the need to use Greenfield land wisely and encourage higher densities on appropriate sites where proposals are in accordance with other LDP policies, it is considered appropriate to give an indication in the LDP as to what density ranges will be acceptable.

However if the Reporter considers that it would add clarity for applicants, the Council would have no objection to the inclusion of an additional column for each development site which gives an indication of the expected density of development.

Martin Pettinger (00246/4/001): Whilst this representation refers to the housing numbers for sites in the Kinross housing market area it is included here as the housing numbers stem from the density ranges identified in the table at LDP paragraph 4.3.13. It is made

clear in paragraph 4.3.13 that the housing numbers given for each housing site are indicative. Any development proposal would also have to accord with LDP Policy PM1: Placemaking (S4\_Doc\_396) which requires all development to “*respect the character and amenity of the place*”.

No modification is proposed to the Plan.

Persimmon Homes East Scotland (09004/19/001); Taylor Wimpey UK Ltd (09004/23/001): LDP paragraph 4.3.13 specifically recognises that unless a proposal indicates that the indicative housing numbers are a maximum “*there will be flexibility within the defined range as long as this does not compromise good design*”. There is therefore support in the Plan to allow higher density development where appropriate. Whilst such higher density developments would have to be compatible with the form and layout of the settlement and be highly accessible to local services as suggested in the representation, it is considered important to retain the emphasis that this must not be at the expense of good design.

No modification is proposed to the Plan.

John Munro (10277/1/012): Given the diverse and varying nature of settlements across Perth and Kinross trying to identify which density ranges should apply to which kinds of location would be difficult and would be unlikely to be comprehensive. LDP Policy PM1: Placemaking (S4\_Doc\_396) sets out the criteria which must be met for all development proposals. This is considered a more practical and useful guide to inform development proposals.

No modification is proposed to the Plan.

#### **Reporter’s conclusions:**

1. None of those making representations disputes the council’s position as set out in paragraph 4.3.12 that the availability of brownfield land in Perth and Kinross is limited and that greenfield sites, especially on prime agricultural land, should be used only when there is good reason to do so. The concerns are focussed on paragraph 4.3.13 and the associated table which sets out Proposed Housing Density Ranges. The council undertook research on the range of housing densities for sites included in the Main Issues Report and these were used to inform the indicative numbers for the housing proposals which appeared in that report. Since that information is available and was integral to the plan making process there seems to be no reason to exclude it from the requirements for development on sites now included within the Proposed Plan. The planning authority is bound to treat each planning application on its individual merits and any proposal for a development whose density would fall outside of the stated range, whether higher or lower, would require a persuasive reasoned justification.
2. The Council has drawn attention to Policy PM1: Placemaking which requires within Policy PM1A that all development “*respect the character and amenity of the place*”, and, beyond that, Policy PM1B sets out criteria which must be met for all development proposals. Bearing in mind the recommendation below regarding paragraph 4.3.13, minor modifications to these policies will ensure that there is no doubt about what is intended by the Council.

**Reporter's recommendations:**

1. For each housing allocation in the plan there should be included an additional column which provides for the users of the plan a range which sets out the expected density of development. As a consequence of that recommendation delete paragraph 4.3.13 including the associated table. Make any consequential changes elsewhere in the Proposed Plan.
2. Modify the first clause in the second paragraph of Policy PM1A to read: "*The design, density and siting of development.*"
3. Modify Policy PM1B at its item (c) to read: "*The design and density should complement...*"