

Issue 26b	Perth Area (out with Core) East Settlements and Landward Sites	
Development plan reference:	5.1.6-8 Employment Land, page 68 5.1.11 Housing Land Table, page 69 Errol, page 110-111 Errol Airfield/Grange, page 112-113 H21 - West of Old Village Hall, Grange, page 112 Inchtute, page 122-123 H24 - Moncur Farm Road, Inchtute, page 122 Rait, page 140 St Madoes/Glencarse, page 145	Reporter: Hugh M Begg
Body or person(s) submitting a representation raising the issue (including reference number):		
George Low (00115) The Morris Leslie Group Ltd (00385/1 & 00385/2) J Carroll (00385/3) Mark Macdonald (00434) Elisabeth Yorke (00458) David Hume (00487) Inchtute Community Council (00701) Mr & Mrs MG Sheret (00721) Corinne MacDougall (00811) Graeme Fitzgerald (01001) Scottish Environment Protection Agency (03194) Muir Homes Ltd (09035)		The Rennie Family Trust (09052) Errol Park Estate (09060) Keir Doe (09067) J W Farquharson/G D Strawson (09117) The Church of Scotland General Trustees (09167) Culfargie Estates Ltd (09289/20) D S McLaren (09289/26) Robert Morgan (09371/2) Morgan Homes (Scotland) Ltd (09371/3) Dr Peter Symon (09723) G S Brown Construction Ltd (09817) CKD Galbraith (10229)
Provision of the development plan to which the issue relates:	Settlements outwith the Perth Core Area (East) and Landward sites	
Planning authority's summary of the representation(s):		
<u>Errol</u> Robert Morgan (09371/2/001): The respondent argues that the approach taken by TAYplan (S4_Doc_633) to the Carse of Gowrie does not seek to prevent housing opportunities in the Carse of Gowrie and that some level of development will be permitted, provided it is of a suitable scale. A site is suggested (S4_Doc_265) for about 300 houses phased over the Plan period and beyond. It is argued that: the landscape framework would be able to absorb new development with the creation of new settlement boundaries in the form of tree planting along the western and north-western boundaries of the land; the south-west boundary of the land abuts new housing development to the north of Errol; the land is enclosed by trees and hedges that define the western and north-western boundaries providing a containable development opportunity, which would prevent further encroachment to the north; the land is flat which makes it more viable for development; the land fronts a main road and could be made readily accessible; services and infrastructure could be made readily available; the land could be regarded as effective and suitable in planning terms; and the land could incorporate improvements to the road network (formation of a new roundabout). Attached statement about the site (Core_Doc_143)		

Dr Peter Symon (09723/6/001): Welcomes settlement development boundary to ensure that all present land is built out first, but this could be accompanied by a statement of presumption against development outwith the settlement boundary. A series of comments are made suggesting changes on the basis that these are considered to be necessary by the respondent.

Errol Park Estate (09060/4/001): Northbank Farm is positioned to the north of Errol and is reported to be free of environmental and physical constraints. Reported to be a better option for development than Errol Airfield (S4\_Doc\_265). The proposed site would actively support Perth Core area given its proximity and transport links. Proportionate phased development here would actively support both Perth and Dundee and be easily accessible.

Errol is a tier 3 settlement and together with the smaller surrounding Carse villages provides a pleasant setting within easy reach of Perth Core Area with its employment opportunities, services and other facilities. The *'good range of amenities and services'* in Errol needs to be sustained in the longer term through housing allocations.

The strategy set out in TAYplan (Core\_Doc\_099) and the Proposed LDP is not ambitious as required by Paragraph 5 of Circular 1/2009 (S4\_Doc\_262). There is presently an over-reliance on the development of limited infill sites (settlement statement). There is already established demand for people to live in Errol following the expansion to the north of Errol (Northbank).

#### Errol Airfield/Grange settlement

G S Brown Construction Ltd (09817/17/001 & 09817/17/002): In conjunction with the landowner, we propose that an area (S4\_Doc\_010) be allocated for housing. This was originally proposed in the MIR (S4\_Doc\_787) (Core\_Doc\_210). There is no economic rationale to upgrade the existing business units, which are reported to have reached the end of their life. Continued employment use at the site could prejudice development of four adjacent houses (planning application 09/01785/IPL (S4\_Doc\_263)). Housing use is sought since it is reported this is a more beneficial alternative for which there is known demand.

Keir Doe (09067/1/002): The present area allocated for mixed uses covers the former RAF hangars and poultry sheds and is occupied by 15 tenants. The land allocated is not large enough to support many more jobs than already exist. The respondent argues that the present facilities are in poor condition and wishes to demolish and reconstruct the premises for existing tenants but also wishes to build additional space for other new tenants (S4\_Doc\_010). They argue that the present allocation is not large enough to allow for the demolition of old and rebuild of new premises or to accommodate additional units. Similarly they contend that low rents and land prices in this rural area mean that some residential development would also be necessary to cross-fund the project.

#### Errol Airfield/Grange H21

Elisabeth Yorke (00458/1/001): The land to the west of Old Village Hall is not suitable for housing development because serious drainage issues exist in the area associated with new housing developments affecting drainage of neighbouring properties and roads (the area between the railway crossing and Newbiggin Farm road end is mentioned); and the road's narrow width makes it dangerous, especially when shared with agricultural traffic. The railway crossing is potentially hazardous because oncoming vehicles do not have clear views.

Graeme Fitzgerald (01001/1/001): Raises concerns that site is greenfield, is next to the railway, there is an unspecified risk of water damage and drainage issues, the road is not wide enough, the site is reported to be an old orchard with interest expressed in its regeneration, and there is no mention of employment or business use. It is inferred that the mixed use area in the settlement should be developed before greenfield land at H21.

Mr & Mrs M G Sheret (00721/1/001): The drainage system in the area near H21 is inadequate and has been unable to cope with the volume of water due to recent housing development, and high levels of rainfall. This has caused localised flooding and made the local road network impassable. The road width is insufficient to cope with traffic. This also poses safety issues for other users such as pedestrians and cyclists. Attached photos (S4\_Doc\_257).

Dr Peter Symon (09723/1/001): H21 is unsuitable for development because there would be an increase in road traffic over the level crossing; the site is exposed to train noise; reduce the amenity of existing homes at Grange; and the land may present drainage problems. Allowing H21 would be inconsistent with the refusal of new housing development in Errol village (5.17.2) because allocated housing land has not been fully taken up. It is difficult to assess the cumulative impacts of infrastructure for H21 and for Errol Airfield/Grange development which lack spatial coherence. A coherent settlement boundary is needed around Errol Airfield/Grange to mitigate the adverse effect of a new 240 unit development (including 60 affordable homes), which will create an isolated estate distinct from the nearest community services and facilities in Errol Village. H21 is cut off from the airfield by the railway line. Development of H21 should be conditional on reaching an agreement with the office of rail regulation to improve the level crossing and ensuring £6,105 per market home completed for education provision and the £200,000 contribution to Errol Community Association solely for the extension of Errol Community Centre paid for by the developer. The description of the site '*west of old village hall*' is misleading since the small hall in question is believed to have been converted to housing some years ago. Apart from the '*green*' proposed in the draft master plan for Errol Airfield '*sustainable village*' the settlement lacks new community services or facilities. Suggests that it would be helpful to know if the Plan proposes to re-establish orchards such as those which used to inhabit H21.

Scottish Environment Protection Agency (03194/35/001): H21 is located in or adjacent to the functional flood plain or an area of known flood risk. As such, part of the site may not be suitable for development. The site specific developer requirements should make it clear to developers that flood risk is an issue to be taken into consideration and that a flood risk assessment will be required to inform the scale, layout and form of development. This will ensure that developers are fully informed of the flood risk issues affecting the site at the earliest opportunity thereby preventing delay and frustration later in the planning process. It will also ensure that flooding issues are taken into account prior to submitting a planning application and potential developers recognise that the developable area of the site may be constrained by flood risk. This would reflect the new duty placed on local authorities in the Flood Risk Management (Scotland) Act 2009 (Core\_Doc\_059).

#### Errol Airfield/Grange new sites

The Morris Leslie Group Ltd (00385/2/001): The statement in 5.18.2 is incorrect and H21 allocation for 16 dwellings misrepresents the situation.

-Errol Airfield has an outline planning permission, and is accounted for in the housing audit as an effective housing site. It has a notional capacity of 240 housing units, 60 of

which are affordable houses for rent. The site exists alongside an established and successful business/commercial/industrial centre, thereby offering employment opportunities to those living in the area.

-The outline planning permission that exists has a red line boundary to the extremes of the airfield, with housing provision currently lying in the north and north eastern parts of the landholding. Should a shortfall of allocated land occur in the Perth Core Area, there is adequate available and unconstrained land at Errol Airfield that could contribute to the Plan.

-It is disappointing that an unconstrained site with a major planning permission is not afforded any formal recognition or allocation within the LDP. The fact that it is described in 1.5 lines in the document, simply as a matter of fact, and without any amplification, perhaps reflects the fact that it was approved by Members, and endorsed by Scottish Ministers, against the recommendation of officials in the first place. To then bracket it in the description Errol Airfield/Grange (16 units) without referring to the capacity afforded planning permission, is a severe misrepresentation of the actual situation.

J W Farquharson & G D Strawson (09117/7/001, 09117/8/001 & 09117/9/001): Grange is a suitable housing site and should be included within the table of housing sites to come forward over the Plan period. Development of a consolidated/new settlement at Grange represents a sustainable way to accommodate part of the growth to be catered for over the Plan period and beyond. The LDP should refer to Grange as a Long Term Strategic Development Area to accommodate part of the growth in the two areas identified at Berthapark and Perth West. Land at Grange should be identified as a growth hub and a strategic growth area so that the lead in time is available to create the supporting infrastructure. Supporting Statement explaining the development concept is attached (Core\_Doc\_098).

J W Farquharson & G D Strawson (09117/10/001): Messrs Farquharson and Strawson own sufficient land at Grange (S4\_Doc\_010) to consolidate the existing dispersed pockets of residential development and create a new community based around a new railway station on the existing line which serves Perth and Dundee. This would be a strategic growth point to complement the peripheral expansion of Perth city.

The Plan presents an over concentration of expansion proposed at West/North West Perth and the North West side of the city in particular is subject to environmental and flood risk constraints. A proportion of the growth directed towards the periphery of Perth could be diverted to the Carse of Gowrie in the vicinity of Grange to create a new settlement. This would be a more sustainable option to accommodate growth and would be based primarily upon rail travel and not car usage.

A new community is suggested that knits together the existing housing at Grange and includes full provision of education and other community facilities that would be needed to support, at its completion, up to 3,500 homes. A supporting statement (Core\_Doc\_098) sets out the land use model that is proposed, which would include employment areas and a new commercial centre to serve the Carse.

The Plan should recognise the long term potential around Grange and make reference to this in the LDP. Development could start towards the end of the Local Plan period (about 2019) and could continue beyond the Plan period. Identification of Grange to contribute towards meeting housing needs in the latter part of the Plan period would not prejudice implementation of the growth around the West and North sides of Perth which is planned to come forward straightaway. If, for whatever reason, development in these areas is delayed then growth at Grange could be brought forward to fill the gap in supply.

The Morris Leslie Group Ltd (00385/1/002): The respondent argues for an allocation for employment use at a site at Errol Airfield (west) (S4\_Doc\_010). The site is reported to be listed incorrectly in the Council's Employment Land Audit 2010 (Core\_Doc\_145), with changes requested to state that planning permission exists and the site is free from constraints. The respondent notes that there is a significant oversupply of employment sites (paragraph 5.1.8), however, examination of the employment land referred to in the 2010 Audit, shows that only 8.25 Hectares of a total of 337 Hectares is unconstrained, with 194.4 Hectares having major constraints and 134 Hectares having minor constraints. Much of the identified land is said to be likely to come forward only in the later years of the Plan, which the respondent argues is not an ideal position should there be economic recovery, and alternative employment land options should be explored.

#### Inchtute H24

J Carroll (00385/3/001): Respondent argues that a capacity of 16 units on this site does not reflect comparable densities for other villages in the same Housing Market Area. It is reported that discussions between the site owner and house builders raise concerns over the viability of such a small number of units. A modest increase could present a more viable project, and represent a more economic and efficient use of land in Inchtute.

Mark Macdonald (00434/1/001): Development of H24 would increase already busy levels of traffic and even more so if there is direct access to the A90. The trees and boundary wall in front of the respondent's property would be removed and these presently provide a wind break and diffuse noise from the A90. The entrance to the development should not be in front of existing properties to avoid blocking sunlight and prevent disturbance.

Muir Homes Ltd (09035/3/001): Site H24 should be deleted from the Plan. The respondent considers that H24 would actually bring infrastructure constraints relating to drainage, the level of the site compared with related infrastructure, and the reluctance by Scottish Water to allow pumped drainage for Inchtute.

David Hume (00487/1/001): Site H24 would overlook the respondent's property opposite. It is reported that the site is presently used as open space and its development would move dog fouling nuisance to the local streets; and that there would be an unacceptable increase in traffic along Moncur Road which would also have a safety impact on the local primary school.

The Rennie Family Trust (09052/4/001): For reasons of visual and landscape impact, residential amenity and road safety issues, H24 should be de-allocated. Instead, the site should remain as open space/community woodland as previously identified within the draft Perth Area/Central Area Draft Local Plan 2004 (Core\_Doc\_128). Use of site H24 for housing would be incompatible with the adjacent industrial estate (Class 5/6 uses) and could limit the currently lawful industrial activities. The proposal runs counter to good planning and in particular PAN56 (superseded by PAN 1/2011) (Core\_Doc\_146).

Inchtute Community Council (00701/1/001): Support Inchtute settlement boundary and H24 within it.

#### Inchtute new site

Muir Homes Ltd (09035/3/002): An alternative to site H24 is identified Site 502 (S4\_Doc\_264) and (S4\_Doc\_011), which makes more sound planning sense than H24 and is better related to the settlement.

Rait

Morgan Homes (Scotland) Ltd (09371/3/001): Respondent wishes an allocation for housing (S4\_Doc\_013), or alternatively an amendment to the settlement boundary to enable a housing proposal to be considered in the future. It is argued that further development would be in keeping with the Conservation Area status. There are existing drainage problems in the village the improvement of which would require significant development to be economically viable, which would be inappropriate. Development of the sites proposed could potentially provide some improvements. Sites could contribute to the housing land requirement providing low density housing catering for different sectors of the housing market. Respondent stresses that it is important that a range of sites are provided, especially smaller scale, to reduce reliance on strategic sites with deliverability constraints.

Corinne MacDougall (00811/1/001): The respondent argues that the settlement boundary excludes gardens belonging to Old Burnside Cottage and Weavers Cottage, which would partially include and partially exclude the two curtilages from the settlement. These curtilages represent original plot layouts, once more characteristic of the village, and therefore should continue to be included in their entirety within the settlement boundary (S4\_Doc\_788).

The Church of Scotland General Trustees (09167/7/001): The respondent argues that there is no valid reason for excluding the site at Rait Glebe (S4\_Doc\_013) from the settlement boundary. The site is relatively flat open agricultural land on the northern edge of the village. The Plan states the settlement boundary at Rait has been drawn tightly to protect the character and historic integrity of the Conservation Area yet the site is within the Conservation Area. Development in the Conservation Area is not prohibited by Policy HE3 (S4\_Doc\_508). The settlement boundary in the adopted Perth Area Local Plan (S4\_Doc\_788) is more logical '*filling in*' this site which has developed land on three sides. Site would be considered as infill under Policy RD3 (S4\_Doc\_418) so there is no valid requirement to remove it.

St Madoes/Glencarse

G S Brown Construction Ltd (09817/14/001): Identification of existing business use at GS Brown headquarters in St Madoes is appropriate but should this use cease the site's use should change to housing.

CKD Galbraith (10229/1/001): There should be less reliance on strategic sites; the Plan should recognise importance of smaller settlements and sites in housing delivery. There is no new housing proposed in St Madoes. Population growth and reducing household sizes could mean people having to leave to find housing. The Plan's housing allocation should be more evenly distributed. Providing limited housing land in St Madoes would be a planned approach to the future of the village and allow gradual growth.

The site proposed (S4\_Doc\_014) is located east of the category A-listed Pitfour Castle. It is unconstrained and deliverable, services are available and development phasing can be managed to ensure education provision. A site in this area was previously in a Finalised Local Plan (S4\_Doc\_789) but was withdrawn following concerns from Historic Scotland. However the character of the setting of the castle has been lost, much of the castle is screened by woodland and no development is proposed to the open southern elevation. Inappropriate impacts of development on the setting can be mitigated using landscape, open space and routes to contribute to an enhanced setting.

D S McLaren (09289/26/001): Reiterate comments in representation 10229/1/001 above

seeking a housing allocation at the site east of Pitfour Castle, St Madoes (S4\_Doc\_014).

#### New Landward Sites

George Low (00115/1/001): Site on submitted plan adjacent to North Mains (S4\_Doc\_011), Inchture should be allocated for housing. Site could accommodate up to 4 houses.

G S Brown Construction Ltd (09817/16/001): Site on submitted plan MIR site 426 at Flawcraig (S4\_Doc\_013) should be allocated for housing. This is a brownfield site, reported to have previously been used as a pheasant hatchery, which is no longer economically viable. It is argued that its reuse would therefore accord with Government policy. A small scale residential development could complement houses on other site of the road. Without an alternative use, the site could become increasingly unsightly.

Culfargie Estates Ltd (09289/20/002): Site on submitted plan at East Melginch MIR site 412 (S4\_Doc\_015) should be allocated for up to 2 Hectares of employment land. This could provide local employment land close to Balbeggie and could facilitate a range of economic activities without significant detriment to the local rural environment. Site could provide local employment opportunities linked to the propose expansion of Balbeggie village nearby. It is reported that there would be little impact on local services and on the transport network, and that the site could help meet demand for lower cost and specification commercial space for sole traders and smaller companies.

Errol Park Estate (09060/1/002): Site on submitted plan at Drums of Ardgait Farm, Errol (S4\_Doc\_017) should be allocated for up to 43 Hectares of commercial/industrial development and roadside services. The respondent argues that the site has space, access and a strategic location. It could provide for a diverse range of economic development opportunities and it could be served by a range of transport modes. The site is greenfield but there are no large vacant brownfield sites in the immediate surrounding area that are accessible and could accommodate long term development. It is reported that the site is not at risk of flooding, there are no environmental designations or significant landscape features limiting its use, and it is not prime agricultural land.

SPP (S4\_Doc\_327) requires Development Plans to identify suitable locations for new or expanded rail freight interchanges. Because Tayside has no rail freight facilities, it is proposed to develop a freight depot on the existing railway line alongside the proposed industrial/business land allocation. An informal discussion with Network Rail suggests that the railway line could be suitable for freight. An integrated lorry park as part of the roadside services could be provided.

The Morris Leslie Group Ltd (00385/1/003): Site at Valleyfield (S4\_Doc\_010), north east of the Inchmichael junction on the A90 trunk road is currently in use for storage and distribution. The site has previously been discussed with the Council as a potential site for the relocation of Perth Auction Mart. An allocation for some mixed use development is also sought at the site. The Respondent argues that the site is well located with easy access to the trunk road system and development would consolidate employment opportunities in the wider Errol area.  
10/01992/FLL (S4\_Doc\_790).

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

##### Errol

Robert Morgan (09371/2/001): Amend settlement boundary to include the site; or

alternatively allocate for housing (S4\_Doc\_265).

Dr Peter Symon (09723/6/001): Proposes several amendments:

- Presumption against development outside Errol settlement boundary.
- Include reference to the landward parts of Errol parish (or area of representation of Errol Community Council).
- More social rented housing should be a priority in the settlement of Errol.
- The conservation area boundary should be extended to the south east to include Cistern Green and the road leading there from Errol village.
- Include conservation area proposals for restoring Cistern Green to return it to a grassy green for sporting, grazing or community purposes.
- Improve the description of Errol village to mention the landward population and fuller details about Errol's historic significance and architecture.
- Qualify the statement about well-provided with amenities by noting the closure of the bank, baker, pub, hotel, train station and loss of employment and rural business.
- The decision by the Council to pursue a site-specific presentation of proposed housing sites means the Plan excludes two sites proposed or permitted for development - Inchoonans and Errol Airfield. Inchoonans proposal for development appears inconsistent with Policy ED1 (S4\_Doc\_483) and should be rejected
- Plan should include discussion of sites outside of Errol to provide a clearer spatial framework.

Errol Park Estate (09060/4/001): All or part of land at Northbank Farm (S4\_Doc\_265), north of Errol be allocated for housing (19 Hectares).

#### Errol Airfield/Grange settlement

G S Brown Construction Ltd (09817/17/001 & 09817/17/002): Change the allocation at Errol Airfield/Grange to include an additional identified area as was indicated in the Main Issues Report (S4\_Doc\_787). Allocate land at Errol Airfield/Grange (S4\_Doc\_010) for housing.

Keir Doe (09067/1/002): Extend the allocation for mixed uses at Errol to cover a larger area and allow for residential development (S4\_Doc\_010).

#### Errol Airfield/Grange H21

Elisabeth Yorke (00458/1/001); Mr & Mrs M G Sheret (00721/1/001): Amend plan to remove site H21.

Graeme Fitzgerald (01001/1/001): Mixed use area should be developed before site H21.

Dr Peter Symon (09723/1/001): Amend Plan to remove site H21 and make other textual revisions to Errol Airfield/Grange Settlement. The Plan should also clarify the use of land not presently granted planning permission or subject to a current proposal that lies within the settlement boundary and should contain a presumption against development outwith the settlement. Clarification of the future use of Errol Airfield (including car boot market, leisure uses of the airstrip and other industrial and employment uses). Amend the location description of H21 as '*West of Old Village Hall*' is no longer appropriate.

Scottish Environment Protection Agency (03194/35/001): A Flood Risk Assessment should be included as a site specific developer requirement for H21. In addition, SEPA recommend that the requirement specifies that no built development should take place on the functional flood plain or within an area of known flood risk.



Errol Airfield/Grange new sites

The Morris Leslie Group Ltd (00385/2/001): Amend Plan to identify a housing site for a sustainable community at Errol Airfield referred to at paragraph 5.18.2. Seek formal allocation for this site, with the added recognition that it can contribute to far more than the 240 units for which there is an extant planning permission.

J W Farquharson & G D Strawson (09117/7/001, 09117/8/001, 09117/9/001 & 09117/10/001): Amend Plan to include a long term strategic development area at Errol Airfield/Grange in the Carse of Gowrie (S4\_Doc\_010). Amend paragraph 5.1.11 to include Grange as a housing site for 1,000 units up to 2024 and 2,500 beyond 2024. Amend Plan to include Grange as a Long Term Strategic Growth Area of area 279 hectares (estimated) and with a capacity of 3,000+ residential units and in excess of 25 hectares of employment land.

The Morris Leslie Group Ltd (00385/1/002): Amend Plan to include an existing employment land site at Errol Airfield (west) (S4\_Doc\_010).

Inchtute H24

J Carroll (00385/3/001): Increase density at site H24.

Mark MacDonald (00434/1/001); David Hume (00487/1/001); The Rennie Family Trust (09052/4/001): Amend Plan to remove site H24.

Muir Homes Ltd (09035/3/001): Amend Plan to remove site H24.

Rait

Morgan Homes (Scotland) Ltd (09371/3/001): Settlement boundary for Rait should be amended to include land (S4\_Doc\_013) in part or in full. The land should also be allocated, in part or in full, for residential development.

Corinne MacDougall (00811/1/001): Settlement boundary for Rait should be amended in the south-western end of the village to follow that in the adopted Perth Area Local Plan (S4\_Doc\_788).

The Church of Scotland General Trustees (09167/7/001): Settlement boundary for Rait should be amended to include land at Rait Glebe (S4\_Doc\_013) as per submitted plan and the adopted Perth Area Local Plan (S4\_Doc\_788).

Inchtute new site

Muir Homes Ltd (09035/3/002): Amend plan to include an identified alternative housing site.

St Madoes/Glencarse

G S Brown Construction Ltd (09817/14/001): Amend Plan to remove final sentence at paragraph 5.34.2.

Suggested replacement text: *'In the event that the existing business use should cease the most appropriate alternative use should be residential to reflect the pattern of surrounding use'.*

CKD Galbraith (10229/1/001); Mr D S McLaren (09289/26/001): Amend Plan to include a housing site to the east of Pitfour Castle, St Madoes (S4\_Doc\_014).

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

The following responses are supported by the Council's Delivering Infrastructure Background Paper (S4\_Doc\_440) which outlines the key infrastructure requirements and proposed timescales to deliver the strategic development areas.

Errol

Robert Morgan (09371/2/001); Errol Park Estate (09060/4/001): TAYplan (S4\_Doc\_067) sets the strategic framework for the Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth HMA. Errol is not in the Perth Core Area. TAYplan (S4\_Doc\_062) also indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie. To be consistent with TAYplan, only limited development can be allocated to the Carse of Gowrie, large sites such as these would not be consistent with TAYplan. The Plan has made allocations at Inchtute and Longforgan, but not Errol. The reason for this is because the village has seen considerable expansion following allocation of a site for 162 houses in the adopted Local Plan (S4\_Doc\_791). This allocation has not yet been completed (the housing land audit (Core\_Doc\_047) notes that there are 102 built and 60 to build) and therefore no additional housing sites are required in the village. No evidence has been submitted that the necessary infrastructure could be made available. The proposed sites would not provide containment as suggested, but would represent sprawl.

No modification is proposed to the Plan.

Dr Peter Symon (09723/6/001): The presumption against development outside Errol settlement boundary is unnecessary because it is already covered elsewhere in the Plan, mainly under Policy RD3 (S4\_Doc\_418) and the Housing in the Countryside Supplementary Guidance (Core\_Doc\_064). The need for social rented housing is already covered elsewhere in the Plan by Policies RD4 (S4\_Doc\_489), RD6 (S4\_Doc\_713) and the Affordable Housing Supplementary Guidance (Core\_Doc\_063). The boundary of the Conservation Area is already covered in Supplementary Guidance (Core\_Doc\_079). Despite the closure of several facilities in the village, services such as a shop, school, hall, and park are available. Generally, the gradual loss of facilities is in common with patterns observed in other settlements. Various points seeking textual changes, particularly relating to areas outside Errol, are not necessary in order to indicate where development should and should not happen, and these changes need not be included in the Plan. The Plan does not contain a proposal for development at Inchcoonans.

No modification is proposed to the Plan.

Errol Airfield/Grange settlement

G S Brown Construction Ltd (09817/17/001 & 09817/17/002); Keir Doe (09067/1/002): The mixed use area in the core of the settlement has been identified because it provides low cost employment premises, which are important to retain, especially for start-up businesses. The Plan recognises the need for cross-subsidy to encourage upgrading of the employment units and it also provides for a small number of houses. The areas suggested for development are relatively large and TAYplan Policy 5 (S4\_Doc\_062) indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie. Without any local services at Errol Airfield/Grange, it would be considered inappropriate to allocate development of the scale suggested.

No modification is proposed to the Plan.

#### Errol Airfield/Grange H21

Elisabeth Yorke (00458/1/001); Graeme Fitzgerald (01001/1/001); Mr & Mrs M G Sheret (00721/1/001); Dr Peter Symon (09723/1/001): The Plan provides a relatively small housing site, which has been carried over from the previous adopted plan (S4\_Doc\_792). Its development would help consolidate the settlement. Network Rail has not objected to the continued allocation of H21 and there is no requirement to upgrade the level crossing arising from H21. Contributions are set out in Supplementary Guidance (Core\_Doc\_069). The Council supports the restoration of orchards through work carried out with bodies such as the Countryside Trust and Policy NE2 (S4\_Doc\_500) and Supplementary Guidance on Green Infrastructure would support the restoration of orchards. It is not appropriate for the Plan to include such detail. Orchards were common in the Carse of Gowrie area however the site is not currently in use as such. The respondent suggests that there is interest in restoring the land for use as an orchard, however not from its owner. Matters relating to flooding and drainage are covered in the next point (Scottish Environment Protection Agency (03194/35/001)).

A settlement boundary is proposed by the Plan to encourage cohesion and links with adjacent development, and it would not be appropriate to specifically limit development outside the settlement boundary at Errol Airfield/Grange because this is already covered elsewhere in the Plan, particularly Policy RD3 (S4\_Doc\_418) and Supplementary Guidance on Housing in the Countryside (Core\_Doc\_064).

The approved uses at Errol Airfield are defined by existing planning consents (S4\_Doc\_793) and it would be inappropriate to restate these in the Plan. The location description of site H21 is considered adequate. It would be inappropriate to include site specific developer requirements for contributions that differ from those set out at Policy PM3 (S4\_Doc\_496) and Supplementary Guidance (Core\_Doc\_069).

No modification is proposed to the Plan.

Scottish Environment Protection Agency (03194/35/001): The issue raised is noted and accepted. If the Reporter is so minded to recommend that the proposed modification is adopted, the Council would be comfortable with this modification because it would not have any implications on any other parts of the Plan.

#### Errol Airfield/Grange new sites

The Morris Leslie Group Ltd (00385/2/001): The site referred to is in the effective housing land supply – site ref. PEL251 (Core\_Doc\_047), it already has planning consent and there is no need to identify it in the Plan as a specific proposal. Instead it is shown on the map as a Significant Housing Planning Consent and referred to at paragraph 5.18.2 and within the effective land supply figure in the table at paragraph 5.1.10. This is a consistent approach to all sites in the Plan that have a planning consent, where the reader is advised that consent exists with a symbol, but the detail of existing consents is not in the Plan.

Turning to the request for a significant additional contribution to housing numbers, TAYplan Policy 5 (S4\_Doc\_062) (as mentioned above) indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie. To be consistent with TAYplan, only limited development can be allocated to the Carse of Gowrie.

No modification is proposed to the Plan.

J W Farquharson & G D Strawson (09117/7/001, 09117/8/001, 09117/9/001 & (09117/10/001): TAYplan Policy 1 (S4\_Doc\_067) sets the strategic framework for the Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth HMA. Grange is not in the Perth Core Area. TAYplan Policy 5 (S4\_Doc\_062) also indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie. TAYplan (S4\_Doc\_063) further indicates that there will be no need for any new settlements during the lifetime of the Plan. To be consistent with TAYplan, only limited development can be allocated to the Carse of Gowrie. Allocation of a further Strategic Development Area at Grange would make the Plan inconsistent with TAYplan, and furthermore would be unnecessary. The suggested new settlement of 3,500 houses would be a major new settlement that would undermine TAYplan's strategy. The suggestion that a new railway station could be provided at this location is not included in TAYplan (Core\_Doc\_002), Regional Transport Strategy (Core\_Doc\_022), the Tay Estuary Rail Study (Core\_Doc\_057), and the Strategic Transport Projects Review (Core\_Doc\_050).

No modification is proposed to the Plan.

The Morris Leslie Group Ltd (00385/1/002): The site referred to is already identified in the Plan as part of the mixed use areas in the core of the settlement and it would be unnecessary to specifically identify it as a proposal in the Plan. Land currently in employment uses at the south of the settlement is covered by the existing Significant Housing Planning Consent symbol.

No modification is proposed to the Plan.

#### Inchtute H24

J Carroll (00385/3/001); Mark MacDonald (00434/1/001); David Hume (00487/1/001); The Rennie Family Trust (09052/4/001); Muir Homes Ltd (09035/3/001): Inchtute lies in the Carse of Gowrie where TAYplan (S4\_Doc\_062) limits development opportunities. The village has expanded considerably and the settlement boundary has been drawn to accommodate only limited further expansion during this Plan period. The proposal for one small site of 16 units best meets these requirements. Given the level of expansion proposed in the village and the constraint on the school capacity, a significantly larger number of units would not be considered appropriate. The number of units at the site is limited by noise issues from the adjacent A90 and the site's relationship to employment land to the north east. A noise assessment may be appropriate at the planning application stage. The access to the proposed site is considered satisfactory and there are no indications from Scottish Water of drainage problems. The responsible supervision of dogs is not a planning issue.

No modification is proposed to the Plan.

#### Inchtute new site

Muir Homes Ltd (09035/3/002): Inchtute lies in the Carse of Gowrie where TAYplan (S4\_Doc\_062) limits development opportunities. The village has expanded considerably and the settlement boundary has been drawn to accommodate only limited further expansion during this Plan period. The proposal for one small site of 16 units within the existing settlement boundary best meets these requirements. It will be possible for a future LDP to determine whether this is a suitable area for settlement expansion

depending on capacity at the time.

### Rait

Morgan Homes (Scotland) Ltd (09371/3/001); Corinne MacDougall (00811/1/001); The Church of Scotland General Trustees (09167/7/001): The Representations wish additional land allocated in Rait for residential development either through boundary extensions or by specific allocations. The areas lie to the east and south west of the village. The sites all lie within the boundary of Rait Conservation Area. Rait Conservation Area appraisal (Core\_Doc\_211) was approved by the Council in August 2012. The appraisal emphasises the unique qualities of Rait with its “fermtoun” origins and eclectic mix of buildings (some listed). The appraisal also indicates these qualities could be easily lost by inappropriate development. The settlement boundary has been tightly drawn around the existing urban form to deliberately emphasise the point. It follows that conservation area policies will be given significant weight when considering any planning applications for the sites which are the subject of the Representations. Policy HE3 (S4\_Doc\_508) emphasises the importance of design, materials, scale and siting when dealing with any development proposals in conservation areas. Any development proposals for Rait will have to show this level of detail to allow proper consideration and the Plan's policy framework strikes the correct balance between allowing appropriate development and protecting the qualities of the conservation area. The proposal by Morgan Homes (Scotland) Ltd (09371/3/001) has the potential to completely change the character of the Conservation Area, even at low density, since the settlement is relatively compact around the old fermtoun.

Turning to the point raised by Ms Corinne MacDougall (00811/1/001), while it is recognised that gardens form part of their respective curtilages, to include them in the settlement boundary might inadvertently give the impression that development such as backland residential development there might be acceptable. The Rait Conservation Area appraisal (Core\_Doc\_211) at paragraph 4.14 highlights superb long range views from the village across the site promoted by The Church of Scotland General Trustees (09167/7/001) and later highlights that these are “...particularly important to its character” (paragraph 9.1).

No modification is proposed to the Plan.

### St Madoes/Glencarse

G S Brown Construction Ltd (09817/14/001): The site is identified for employment uses reflecting the current land uses. Residential properties exist on the south and west boundaries. However it is part of the overall strategy of the Plan to identify employment areas in villages and it is important that this site is retained for this purpose because it is the only employment site serving the settlement.

No modification is proposed to the Plan.

CKD Galbraith (10229/1/001); D S McLaren (09289/26/001): Pitfour Castle is a Category A listed mansion by Robert Adam. The site is part of the former policies of the mansion and Historic Scotland has previously objected to any development taking place on this site due to the adverse impact this would have on the setting of the listed building. It has been indicated that Historic Scotland would continue to object should an allocation be proposed at this location. TAYplan (S4\_Doc\_062) also indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie. To be consistent with TAYplan, only limited development can be allocated to the Carse of Gowrie, large sites such as these would

not be consistent with TAYplan. The Plan has made allocations at Inchtute and Longforgan, but not St Madoes. The proposal is for a relatively large allocation and school capacity would be an issue.

No modification is proposed to the Plan.

#### New Landward Sites

George Low (00115/1/001): The site is outside any settlement boundary and is of a relatively small size. Accordingly there is no need to specifically identify it in the Plan. Policy RD3 (S4\_Doc\_418) and the Supplementary Guidance on Housing in the Countryside (Core\_Doc\_064) already cover this issue adequately. In addition, the site is greenfield.

No modification is proposed to the Plan.

G S Brown Construction Ltd (09817/16/001): The site is outside any settlement boundary and is of a relatively small size. Accordingly there is no need to specifically identify it in the Plan. Since the site is brownfield, Policy RD3 (S4\_Doc\_418) and the Supplementary Guidance on Housing in the Countryside (Core\_Doc\_064) already cover this issue adequately and might provide an opportunity for development.

No modification is proposed to the Plan.

Culfargie Estates Ltd (09289/20/002): The Representation seeks an allocation of a site for small rural businesses. There is no need to specifically identify this site in the Plan because it is more appropriate to consider this under the terms of Policy ED3 (S4\_Doc\_395), which gives favourable consideration to the expansion of existing businesses and the creation of new ones in rural areas, and it is considered that this Policy covers this issue adequately.

No modification is proposed to the Plan.

Errol Park Estate (09060/1/002): This Representation seeks an allocation in the Plan for a regional scale multi-modal freight facility, which raise issues that 'cross local authority boundaries or involve strategic infrastructure' (SPP paragraph 10 (S4\_Doc\_328)), meaning that it should be addressed at the SDP level.

Section 16(6) of the Planning Etc (Scotland) Act 2006 (S4\_Doc\_732), states that 'the planning authority are in preparing the local development plan to ensure that the Plan prepared is consistent with the Strategic Development Plan.'

TAYplan Policy 4 (S4\_Doc\_633) requires LDPs to identify specific sites for strategic development areas but does not allocate land for this purpose at this site. TAYplan Policy 3 (S4\_Doc\_064) safeguards land for future infrastructure provision (including routes) that are integral to a Strategic Development Area or promote freight modal shift, but does not safeguard land at this site.

The Regional Transport Strategy (Core\_Doc\_022) does not contain policies or proposals that would support an allocation in the Plan. Furthermore, the suggested allocation was not identified in Transport Scotland's Strategic Transport Projects Review (Core\_Doc\_050).

The Council considers therefore that to make this allocation land would render the Plan inconsistent with TAYplan, which specifically identifies the strategic development areas that will contribute to the region's economic success; and with the Regional Transport Strategy; and the Strategic Transport Projects Review.

No modification is proposed to the Plan.

The Morris Leslie Group Ltd (00385/1/003): TAYplan (S4\_Doc\_067) indicates that there is a presumption against allocating development land releases in areas surrounding the Perth and Dundee Cores. To be consistent with TAYplan, the Plan only identifies limited development in the Carse of Gowrie.

There is no need to specifically identify this site (S4\_Doc\_010) in the Plan because Policy ED3 (S4\_Doc\_395) gives favourable consideration to the expansion of existing businesses and the creation of new ones in rural areas, and it is considered that this policy covers this issue adequately.

No modification is proposed to the Plan.

### **Reporter's conclusions:**

#### Preliminary Matters

1. TAYplan sets the strategic framework for the Proposed Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth Housing Market Area. Policy 1: Location Priorities identifies the hierarchy composed of 3 tiers within each of which a sequential approach to prioritising land release whether for residential or other uses must be adopted. The policy allows for some development in settlements which are not defined as principal settlements but only where this can be accommodated and supported by the settlement. In rural areas (i.e. outside of boundaries of settlements) the release of land must genuinely contribute to the objectives of TAYplan and meet specific local needs or support regeneration of the local economy.

2. Policy 5: Housing of TAYplan at its subsection C states a presumption against land release in areas surrounding the Perth Core Area, including the Carse of Gowrie where that would prejudice the delivery of any of the Strategic Development Areas. These are identified in Table 1: Strategic Development Areas of Policy 4: Strategic Development Areas.

3. Applying that policy framework to Issue 26b - Perth Area (outwith Core) East Settlements and Landward Sites- it is concluded that:

- All of the areas of land referred to lie in the Carse of Gowrie. However, a release on any one of them would not prejudice the delivery of any of the Strategic Development Areas identified in Table 1: Strategic Development Areas which is incorporated within Policy 4 of TAYplan.
- None of the settlements referred to is identified a principal settlement in TAYplan i.e. falls within Tier 1, or Tier 2, or Tier 3.
- It has been established elsewhere in this report that there is sufficient land allocated to deliver the housing requirements of TAYplan within, or on the edge of, principal settlements.

With these conclusions in mind, critical tests to be applied to each of proposed land releases referred to in this Issue are:

- For proposals within established settlement boundaries whether the release could be accommodated and supported by the settlement.
- For proposals outwith established settlement boundaries the release of land genuinely could contribute to the objectives of TAYplan and meet specific local needs or support regeneration of the local economy.
- Whether there are any other material considerations which would justify setting aside these strategic policy considerations to accommodate the strategy of the Proposed Plan to allocate limited growth to those settlements with a range of facilities capable of serving local needs.

#### Errol

4. A short history of the settlement and its vicinity is incorporated into the Errol Conservation Area Appraisal (August 2009) at its sections 3 and 4. Accordingly, there is no need to bulk out the description in paragraph 5.17.1 with further historical detail. Of considerably more importance, contrary to the text in paragraph 5.17.1, Errol is not identified as a principal settlement in TAYplan or, indeed, in this proposed local development plan at the relevant paragraph 4.2.1.

5. There was an allocation of a site for 162 houses in the adopted Perth Area Local Plan. That allocation has not yet been fully built out and there is no overwhelming need for additional housing sites within the settlement at this stage in the planning process.

6. The site promoted by Morgan Homes (Scotland) Ltd lies outside the established settlement boundary. The council proposes to retain the current delineation and no persuasive justification has been brought forward to justify its abandonment in this vicinity to meet the respondent's aspirations. The release of 14.56 hectares to accommodate some 300 houses on greenfield land currently in agricultural use is not supported by evidence of any specific local need or a substantive contribution to the local economy.

7. Errol Park Estate seek the allocation of all, or part, of 19 hectares of greenfield, agricultural land for a substantial residential development with open space, affordable housing and community facilities. The farmland lies outside of the settlement and the allocation is not supported by evidence of any specific local need or a substantive contribution to the local economy.

#### Errol Airfield/Grange settlement

8. The settlement boundary for Grange as that appears in the adopted Perth Area Local Plan has been substantially extended in the Proposed Plan to include portions of the former Errol Airfield. No exception has been taken to the generality of that proposal and, accordingly, no conclusions are reached here on its merits for inclusion in the local development plan.

9. G S Brown Construction Ltd proposes the allocation for housing of a large area of land identified in an indicative fashion on Map 17 of the Main Issues Report. It has been established elsewhere in this report that there is sufficient land allocated to deliver the housing requirements of TAYplan within, or on the edge of, principal settlements. Errol Airfield/Grange is not a principal settlement and it follows that the allocation of land for housing, as the respondent and landowner prefer, would run contrary to the policies of



strategic development plan. No evidence has been provided to that the settlement has a range of facilities capable of serving local needs.

10. The owner of Muirhouses Farm proposes that an area of land of approximately 4.4 hectares south of Grange be allocated for mixed development. In both the adopted local plan and the proposed local development plan the site lies outside the settlement boundary. The proposals to replace the former RAF sheds/hangers built 70 years or so ago and to re-house existing tenants would be in accord with the objectives of TAYplan. However, on the evidence presented it is not clear that this laudable outcome, or indeed the provision of a community orchard, is dependent on a further extension of the settlement boundary. Nor is there sufficient evidence that this exceptional release would fulfil a specific local need that cannot be met elsewhere for housing or employment land.

#### Errol Airfield/Grange H21

11. The site, of some two hectares, was identified in the adopted Perth Area Local Plan 1995 as site ALT H12c. Despite its vintage, and the fact that there have been numerous consents in the vicinity, the site remains undeveloped. It is currently greenfield agricultural land but not in use as an orchard.

12. The surfacing of some roads in this vicinity is less than perfect, and at peak times there is congestion in the vicinity of the former airfield which now has alternative uses. However, the additional traffic generated from 16 houses on this site does not present an insuperable hurdle to its development. Other matters of concern are dealt with elsewhere in the Plan. In particular, the concerns of local residents regarding safety at the nearby level crossing have been dealt with as they apply generally across Perth and Kinross by way of the recommended modifications to Policy TA1: New Development Proposals which are to be found at Issue 10 of the report.

13. The Scottish Environment Protection Agency (SEPA) shares the concerns expressed by other respondents regarding flooding because the “*site is located in or adjacent to the functional flood plain or an area of known flood risk*”. With that evidence in mind, a minor addition to the site-specific development requirements is appropriate.

#### Errol Airfield/Grange new sites

14. As far as the representations from the Morris Leslie Group Ltd are concerned, paragraph 1.1.2 of the Proposed Plan makes it clear that: “*The Development Plan provides the framework against which planning applications are assessed.*” This explains why sites which already have planning permission are not identified.

15. The proposals by J W Farquharson and G D Strawson amount to a new settlement to be located on around 279 hectares including employment land served by a railway station and with a provision for 3000+ houses. Neither TAYplan Policy 1 nor TAYplan Policy 5 nor any other strategic guidance provides any support for a new settlement or the other notions to which the respondents have in mind. Accordingly, no modification to the Proposed Plan need be contemplated.

#### Inchtute H24

16. Site H24, of approximately of 3.6 hectares, is located within the established boundary of the settlement of Inchtute. It has been identified for 16 houses to be built out on two hectares. The additional traffic generated is not sufficient reason for its deletion

from the Proposed Plan and the other concerns raised can be addressed by way of the site-specific developer requirements associated with its allocation. A development of this size can be accommodated and supported adequately within the settlement. However, an increase in the number of houses could not be accommodated without unacceptable loss of amenity.

#### Inchtute new site

17. The site promoted by Muir Homes Ltd lies outside the settlement boundary which was established in the adopted Perth Area Local Plan 1995 and retained in the Proposed Plan. It falls to be considered as an additional allocation. There is no evidence to support a view that an exceptional release can be justified on the grounds that it meets specific local needs or is necessary to support regeneration of the local economy.

#### Rait

18. The land identified by Morgan Homes as a potential residential development opportunity is located to the south of the boundary of the settlement of Rait. It is promoted as 2 parcels which, taken together, amount to approximately 2.2 hectares. Given the conclusions elsewhere in this report regarding the strategic land supply, the two parcels fall to be considered as additional housing allocations. An exceptional release cannot be justified on the grounds that one or other of the parcels, or both, would meet a specific local need or is necessary to support regeneration of the local economy. Moreover, a development would run contrary to the retention of the distinctive qualities of the settlement as identified in the recently completed Rait Conservation Area Appraisal (August 2012).

19. As far as the site known as Rait Glebe is concerned, the Appraisal refers to it as follows: *“4.14 On the eastern edge of the village are the churchyard and the remains of the medieval parish church. The church is situated on a knoll and there are superb long range views from here of the Carse of Gowrie and to Dundee beyond. That site has been identified by the Council as important to the character of the settlement which is contained within the conservation area.”* The parishes of Rait and Kilspindie were merged sometime around 1634 and there is no evidence to support a view that the use of the Glebe has been related to any of the existing buildings in the settlement since then. In short, it has functioned as part of the adjacent countryside. The council has a sound reason for the alteration to the settlement boundary: *“a tight boundary has been drawn to protect the character and historic integrity of the Conservation Area.”*

20. The settlement boundaries delineated in the Proposed Plan exclude the long established gardens within the curtilages of the properties known as Old Burnside Cottage and / or Weavers Cottage on the grounds that established settlement boundary *“might give the impression that development such as backland residential development there might be acceptable”*. It is for the development management process to determine whether a proposal for development in the garden grounds of Old Burnside Cottage or Weavers Cottage would, or would not, be acceptable in the light of the statutory requirements of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 and all the policies of the development plan, including those which are relevant to conservation areas, and any other material considerations which may be applicable. The alteration to the settlement boundary in the Proposed Plan appears to serve no useful purpose.

St Madoes/Glencarse

21. The site, known as the Nurseries, accommodates the headquarters of G S Brown Construction Ltd. There are houses on the south and west boundaries of the site and the company considers that if it were to move elsewhere, its current property could be seen as appropriate for a change of use. It seeks a statement to the effect that: *"In the event that the existing business should cease the most appropriate alternative use should be residential to reflect the pattern of the surrounding use."* Any such statement would be premature. The respondent acknowledges that the site is currently in use as employment land. In the event that the company transfers its business to another location it would be open to it at that stage in the planning process to make an application for planning permission for a change of use at The Nurseries to residential.

22. The release of the greenfield agricultural land in countryside in the vicinity of Pitfour Castle for housing would be contrary to the policies of TAYplan and no circumstances have been raised which would justify an exceptional allocation. No weight can be given to the fact that Historic Scotland objected to a previous application for planning permission. That is part of the history of the site which will be taken into account at the development management stage should a planning application be lodged; it is not factor determining whether or not land should be allocated for residential development within this Proposed Plan. Historic Scotland has not made a representation and, accordingly, the stance it would adopt in the event of an application coming forward for development of these 8.75 hectares can only be speculation at this stage of the planning process.

New Landward Sites

23. As far as the land at Drums of Ardgath Farm is concerned, Errol Park Estate proposes that all or part of 43 hectares of land be allocated for commercial, industrial development and roadside services. The evidence submitted acknowledges that the proposition is at an early stage of what inevitably will be a long gestation period. The respondent has suggested that this is a strategic location. However, there is no mention of it in either TAYplan, the Regional Transport Strategy 2008 - 2023 produced by the Tayside and Central Scotland Transport Partnership, or any other relevant document dealing with strategic matters. Accordingly, the proposed allocation does not have the support necessary for any reference to be made to it in the Proposed Plan.

24. The site, of 1.12 hectares, at North Mains, Inchtute is below the minimum required to justify a specific land allocation in the Proposed Plan. The merits of a planning application for building 4 houses on this site can properly be considered by way of the development management process.

25. Although the site referred to is considerably larger, at 3.7 hectares, similar considerations apply to any proposal to develop a part of the former pheasant hatchery located on the south side of the road at Flawcraig. That application will require to take into account not only that part of the site which lies within the inner zone of a pipeline consultation area but also the fact that there is archaeological interest on the north east corner.

26. For the same reasons, the merits of Culfargie Estate's aspirations for a new employment site of up to 2 hectares at East Melginch, north east of Balbeggie should be assessed by way of the development management process.

27. The process of producing a local development plan should not be confused with the assessment of a particular application for planning permission whether this is at the pre-application stage or beyond. Accordingly, there is no need to identify land at the north east corner of the Inchmichael junction in the Proposed Plan.

#### **Reporter's recommendations:**

##### Errol

1. Delete the word "*principal*" in paragraph 5.17.1.

##### Errol Airfield/Grange H21

2. Add to the site-specific developer requirements: "*Flood risk assessment*".

##### Rait

3. Modify the settlement boundary for Rait to follow, in the vicinity of Old Burnside Cottage and Weavers Cottage, that identified in the adopted Perth Area Local Plan.