

Issue 1	A Successful, Sustainable Place	
Development plan reference:	Section 3.1 A Successful, Sustainable Place p.13-18	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div><div>Gavin & Carmen Tripney (0029)</div><div>Brian Rickwood (0035)</div><div>Derek & Agnes Redfern (0048/01)</div><div>James C Somerville (0056)</div><div>Tayside & Central Scotland Transport Partnership (Tactran) (0057)</div><div>Daisy Heriot Maitland (0077)</div><div>Mr Crawford Wilson (0081/01, 0081/02 & 0081/04)</div><div>J&J Atherton (0088/01 & 0088/02)</div><div>Ben Challum Ltd (0107)</div><div>Alison Bowman (0129/01 & 0129/02)</div><div>Mr Martin Smith (0146)</div><div>Mr & Mrs Fleming (0150)</div><div>Braes of the Carse Conservation Group (0161)</div><div>Mrs Kathleen Wilson (0167)</div><div>David Wilson (0169)</div><div>Andrew Dundas (0175)</div><div>Muir Homes (0214/03)</div><div>Martin Hogg (0227/01)</div><div>George & Susan Allan (0249)</div><div>Alan Palmer (0274)</div><div>Stewart Milne Homes (0290/02, 0290/03)</div><div>John W Rogers (0304)</div><div>Peter & Patricia Murphy (0323)</div><div>Dr Gillian Allan (0342/02)</div><div>Mr Angus Barrie (0352)</div><div>Scottish Natural Heritage (SNH) (0353)</div><div>Mr & Mrs Short (0382)</div><div>Christian Campbell (0388)</div><div>Tom & Lucy Boylan (0398)</div><div>Alan King (0405)</div><div>Lynn Manderson & James Wilson (0421)</div><div>Frank Stevenson (0422)</div><div>Perth Civic Trust (0444)</div><div>Scottish Government (0451)</div></div><div><div>Theatres Trust (0454)</div><div>Kinross Estate Company (0466)</div><div>Errol Estate (0472)</div><div>Mrs Anne Glasgow (0482)</div><div>Jeffrey Rowlinson (0485)</div><div>Mrs Freda Robb (0520)</div><div>JB Scott (0521)</div><div>John Dewar Lamberkin Trust (0532/01)</div><div>Royal Society for the Protection of Birds (RSPB) (0546)</div><div>ED Capital (0547)</div><div>N Alexander Esq (0549)</div><div>David Scott-Angell (0550)</div><div>Bellway Homes Limited (0559)</div><div>Homes for Scotland (0562)</div><div>Mr Adam Neilson (0566)</div><div>Andrew Thompson (0574)</div><div>Mrs Pauline Toole (0576)</div><div>Gladman Developments Ltd (0577)</div><div>Dr Joe Toole (0579)</div><div>Leslie W Paterson (0586)</div><div>Aldi Stores Ltd (0591)</div><div>Wallace Land Investments (0594)</div><div>John Beales Esq (0601)</div><div>The Pilkington Trust (0608)</div><div>Scone Estate (0614)</div><div>Mrs Jacqueline Edwards (0620)</div><div>A&J Stephen Limited (0622)</div><div>Duncan Scott (0626)</div><div>Felicity Martin (0638)</div><div>Mr & Mrs P. Sloan (0655/01 & 0655/02)</div><div>Joyce & Mike Nairn (0671)</div><div>Rosemary Philip (0700)</div><div>Luncarty, Redgorton & Moneydie Community Council (0703)</div><div>Mr Ross Millar (0708)</div></div></div>		
Provision of the development plan to which the issue relates:	Strategic issues relating to the housing land requirement and housing land supply.	
Planning authority's summary of the representation(s):		

Introductory Paragraphs

SNH (0353/01/002) Add the word 'environment' to the first paragraph on page 14 to ensure that the role of the natural heritage in supporting the economy and sense of place is better reflected in this chapter's vision and objectives.

Vision

SNH (0353/01/002) Amend the vision for a Successful, Sustainable Place' to ensure that the role of the natural heritage in supporting the economy and sense of place is better reflected in this chapter's vision and objectives.

RSPB (0546/01/001) Considers that the vision as currently proposed does not include any reference to the area's natural heritage and environmental sustainability. Changes are sought to ensure that they are more consistent with Scottish Planning Policy (SPP) (CD004). Paragraph 13 of SPP confirms that development plans should contribute towards several outcomes including "Outcome 3: A natural, resilient place — helping to protect and enhance our natural and cultural assets, and facilitating their sustainable use".

Aldi (0591/01/001) Supports vision

Key Objectives

SNH (0353/01/002) Consider that the LDP Objectives 10, 12 and 13 (listed in Table 9 of the SEA Addendum to the Environmental Report (CD067) should be added to this section to ensure that the role of the natural heritage in supporting the economy and sense of place is better reflected in this chapter's vision and objectives.

RSPB (0546/01/001) Considers that the last objective should be amended as the key objectives as currently proposed do not include any reference to the area's natural heritage and environmental sustainability. The changes are sought to ensure that they are more consistent with Scottish Planning Policy (SPP) (CD004). Paragraph 13 of SPP confirms that development plans should contribute towards several outcomes including "Outcome 3: A natural, resilient place — helping to protect and enhance our natural and cultural assets, and facilitating their sustainable use".

Theatres Trust (0454/01/001) Recommends increased reference to culture within the Plan and suggests that the sixth bullet point within the Key objectives ("Promotion of a strong cultural character through community sport and recreational facilities offering opportunities for social interaction and local identity") could be broadened to also include 'arts' and 'cultural' alongside community, sport recreation. This would better align the objectives to the definition of social and community facilities set out in the Glossary.

Tactran (0057/01/001) supports the Key Objectives, particularly the 4th bullet point regarding focussing on development in accessible centres, as it is essential that development is located where it is accessible by a range of sustainable transport modes.

Aldi (0591/01/002) Support objectives

Housing Land Requirement

James C Somerville (0056/01/001); Mr & Mrs Fleming (0150/01/014); John W Rogers (0304/01/001); Joyce & Mike Nairn (0671/01/001): Object to the number of houses proposed for development in the Plan for some or all of the following reasons:

- Impact on the environment
- No account taken of community's views
- No rhyme or reason for the numbers proposed
- Major developments allowed to start without significant infrastructure in place
- No need for this extent of over-development of Perth and the surrounding area especially given the lack of large employment opportunities and the fall in house prices; should instead be attracting long term employers
- Population figures upon which the Plan is based are out of date, more up to date figures (2014 projections, RD032) show a trend to lower migration and hence lower population increase – TAYplan and LDP housing requirements are therefore illogical and irrational

Jeffrey Rowlinson (0485/01/009): The housing requirements for the Scone Area are not a true reflection of need.

Rosemary Philip (0700/01/002): Dunning does not need any more housing.

Stewart Milne Homes (0290/03/011): Have serious reservations regarding the Housing Land Supply and its failure to deliver the required number of homes. SPP (CD004, paragraph 116) requires the housing supply target to be increased by a margin of 10-20% in order to ensure a generous supply of housing is provided. Objection is made to only an 18% margin in the Proposed Plan; a 20% generosity, across all areas, is more appropriate. This will give the flexibility necessary for the continued delivery of new housing, even if unpredictable changes to the effective housing land supply occur during the lifetime of the Plan. This will also promote population increase which is key to economic development and the success of the area, and will maintain viable communities and ensure infrastructure and services are adequate to meet the needs of existing and future communities.

Adjustments to the Housing Land Requirement

Reallocation from the Kinross to the Greater Perth Housing Market Area (HMA)

Frank Stevenson (0422/01/001); Kinross Estate Company (0466/01/001); Adam Neilson (0566/01/005); Luncarty, Redgorton & Moneydie Community Council (0703/01/001): Object to the reallocation of 10% of the housing land requirement from the Kinross to the Greater Perth HMA for some or all of the following reasons:

- This is an unsustainable approach – local housing need and demand should be met in the area where that need arises and where new home owners wish to live.
- With the windfall adjustment, the housing land requirement in the Kinross HMA is effectively reduced by 20% or over 200 units.
- Alternative means of addressing the environmental impact of development on Loch Leven should be considered, such as the allocation of brownfield sites which are currently in another use as this would allow the Council to regulate and control the impact of development on the Loch.
- The Council acknowledges that environmental improvements have been made to the Loch yet the re-allocation remains.

Windfall Sites Assumption

Ben Challum Ltd (0107/01/006): Supports the restraint on windfall as most completions should come from housing allocations.

Kinross Estate Company (0466/01/005); Adam Neilson (0566/01/006); Gladman Developments Ltd (0577/01/004); Duncan Scott (0626/01/003): Object to the assumption that 10% of the housing land requirement will be met from windfall sites for some or all of the following reasons:

- The replacement LDP is continuing to place too much reliance on unplanned development to meet its housing land requirements.
- Planning Advice Note (PAN) 2/2010 (CD040, paragraph 62) states that windfall sites should only count towards meeting the housing land requirement once planning permission has been granted for residential development and it has been considered to be effective, or is being developed.
- Since 2013 50% of the housing land supply has been delivered on windfall sites; the Council should see the 10% windfall allowance as a positive for facilitating housing growth and should do more to facilitate windfall sites through the LDP.

Frank Stevenson (0422/01/003); Luncarty, Redgorton & Moneydie Community Council (0703/01/006): In each of the years 2013-16 over 50% of new build in Perth & Kinross has been windfall. The windfall assumption of 10% is therefore too low.

Housing Land Supply

Stewart Milne Homes (0290/03/004); Homes for Scotland (0562/01/002); A&J Stephen Limited (0622/01/018): Acknowledge the annualised delivery target of around 846 across Perth & Kinross but the total Housing Supply Target of 10,152 still must be delivered by 2028 (Stirling LDP Examination Report, CD159, page 52, paragraphs 53 and 58).

Based on the 2016 Housing Land Audit (CD051) there is an undersupply of land for at least 610 houses. This does not take into account the oversupply in the Greater Perth HMA. This over supply is necessary as the land supply in Greater Perth is dominated by strategic sites and the respondents would not support any reduction in the land supply within the Greater Perth HMA.

The 2016 Housing Land Audit includes an Adjusted Total 'to reflect the best estimate of likely delivered units' (CD051, page xi). The total assumed land supply in the Audit therefore over-estimates the likely delivery (the adjusted total) by nearly 3,000 houses. A revised Table 4 is suggested which identifies a total shortfall of 2,144 units.

The 2017 Housing Land Audit (CD050) is now available and the following is noted:

- 586 houses were delivered in 2016/17; 521 were predicted over this period in the 2016 Audit.
- The unadjusted 5 year effective land supply position was 4,780 in the 2016 Audit and 4,115 in the 2017 Audit (3,260 and 3,145 adjusted figures).
- From the 2017 Audit it is assumed that an unadjusted supply of 3,293 / adjusted supply of 3,000 may be achieved by 2028.

Taking these figures together a further iteration of Table 4 is suggested which identifies a total shortfall of 2,423 units.

The Council acknowledges the programming of sites in the Audit may be over-optimistic and yet still relies on this programming being achieved. The development plan must be the primary route to the delivery of housing land and whilst there are provisions within Policy 24 to release additional land where an undersupply arises this should be seen as an exception rather than the rule. As of 2017 the 5 year effective land supply position would be 4.3 years. Further land should therefore be allocated within the Plan to ensure a generous supply which can deliver enough new houses by 2028.

Housing Land Supply comments relating to specific HMAs

Duncan Scott (0626/01/004); Stewart Milne Homes (0290/02/003): Additional land should be allocated in the Greater Perth HMA in order to meet the TAYplan housing land requirement (CD022, page 23). Stewart Milne Homes (0290/02/003): A site is proposed in Burrelton (MU420) which can help address the need in the Greater Perth HMA.

A&J Stephen Limited (0622/01/026): Methven is a tier 1 principal settlement within the Perth Core Area (TAYplan, CD022, page 8). The current land supply in Methven (at Drumgrain Avenue) is not enough to satisfy TAYplan's locational and strategic housing requirements. Land at Methven should be considered for strategic housing land and mixed use allocation (H418).

Mr & Mrs P. Sloan (0655/01/002 & 0655/02/002): Additional land allocations are required over and above those in the Proposed LDP2 to assist output and deliver the TAYplan and LDP spatial strategy for the area in line with SPP (CD004) and PAN 2/2010 (CD040) requirements. Sites in the Perth Core Area which are well related to their settlement and where infrastructure capacity is available should be considered for allocation to assist housing delivery. Two sites are proposed for inclusion within the settlement boundary at Methven (H221 and H412) which will contribute to the housing land supply as windfall sites. The provision of suitable windfall sites is considered important within the context of the Council's Housing Background Paper (CD018, page 3).

Kinross Estate Company (0466/01/006); N Alexander Esq (0549/01/002); Wallace Land Investments (0594/01/003); John Beales Esq (0601/01/002): Each respondent promotes a site which will help address an identified shortfall in housing land supply in the Kinross HMA.

Adam Neilson (0566/01/002): Additional land should be allocated in the Kinross HMA in order to meet the TAYplan housing land requirement (CD022, page 23).

Wallace Land Investments (0594/01/003): Current allocations within the LDP will not be delivered as anticipated within the Plan period which will impact on the maintaining of an effective housing land supply as required by SPP (CD004). The West Kinross site (H136) could be developed in the short term but could also be safeguarded for beyond 2023. Post 2023 completions for Kinross are 22 per annum from the Lathro site. Greater annual completions could be generated within Kinross and another site, such as West Kinross, could be accommodated.

Kinross Estate Company (0466/01/006): Allocation of the site at Perth Road, Milnathort (H142) would ensure delivery of the housing land requirement for the Kinross HMA in full

in a sustainable way through the managed release of greenfield land rather than the reliance on unplanned windfall development and the transfer of local housing requirements to another HMA. The existing problem at Loch Leven can be addressed on this site through drainage and associated infrastructure improvements.

N Alexander Esq (0549/01/002): LDP2 refers to Scotlandwell as able to accommodate a small amount of growth (page 297). The allocation of site H161 would also contribute to national affordable housing targets.

John Beales Esq (0601/01/002): It is unlikely that all the sites identified in the adopted LDP will come forward within the required timetable. Site H163 at Scotlandwell is effective and can be brought forward in the short term.

Muir Homes (0214/03/002): Object to the housing land requirement for the Strathearn HMA. Based on the published Housing Land Audit (2017 Audit, CD050):

- In Auchterarder all but one of the existing sites will be completed by 2022/23 with only 100 houses to be built within Auchterarder Framework 2.
- In Crieff 145 houses on 3 sites to be built beyond 2023/24.
- In the Landward area all sites are completed by 2023/24 except 25 houses within the gWest allocation.

A shortfall in supply is identified within the Strathearn HMA and the Plan allocates two new sites in Auchterarder but these equate to less than two years effective supply. Insufficient land has therefore been identified within Auchterarder to meet the areas development needs to 2028 and beyond, and meet the objectives and vision of the Plan.

Bellway Homes Limited (0559/01/002): The Plan identifies four additional sites to meet the housing land shortfall in the Strathmore HMA but the deliverability of some of the sites, specifically H252 Annfield Place and H341 Westfields of Rattray, is questioned. The Council should review its approach to addressing the identified shortfall and release additional sites to ensure the shortfall can be addressed.

Spatial Strategy for A Successful, Sustainable Place

Perth & Kinross wide comments

Braes of the Carse Conservation Group (0161/01/004): Support the TAYplan hierarchical system (CD022, page 8). The Plan strategy restricts growth within the smallest and least accessible settlements with few or no local facilities and this is a logical approach to adopt.

Tactran (0057/01/002): Supports the spatial strategy that follows the TAYplan hierarchical approach and focusses the majority of new development in the Tier 1: Perth Core Area and lesser share of new development in Tier 2 and Tier 3 settlements. This will ensure that development will be in locations that are accessible by a range of sustainable transport modes.

Stewart Milne Homes (0290/03/005): Object to the tiered approach identified in TAYplan. Auchterarder, for example, is a tier 3 settlement yet it is in a strategic location on the A9 with good transport links to Glasgow and Edinburgh and therefore has a stronger housing market than some of the tier 2 settlements. The TAYplan settlement hierarchy is not helpful in meeting the objective to direct growth to appropriate locations.

Andrew Dundas (0175/01/001): The Council has not done adequate or proper research to inform the Plan's strategy for spread-out development. The Council should not rely on TAYplan's research but instead carry out its own for the following reasons:

- The assumptions about future households' needs are remote from reality.
- The predominance of small and dual income households is not adequately represented. More good quality and owner-occupied city centre apartments are needed.
- Present and proposed settlements will require excessive use of motor vehicles. Many households of older one and two persons will become marooned in their homes as they grow older and frailer.
- Lack of clear information, for example to explain the supposed growth in inward migration.

Mrs Jacqueline Edwards (0620/01/002): Meeting the housing demands for Perth & Kinross requires strategic innovation by erecting a new town near to main road and rail routes so that expansion can occur with proper infrastructure.

ED Capital (0547/01/004): The approved development strategy across Perth & Kinross under the adopted LDP (CD014) is under performing and will not meet the housing land requirement to 2024. Further land releases are therefore needed urgently in LDP2 to rectify this and ensure a minimum 5 years effective supply of land at all times.

Errol Estate (0472/01/006); ED Capital (0547/01/002); Gladman Developments Ltd (0577/01/001); Scone Estate (0614/01/004): The Plan should allow for developments in settlements that are not defined as principal settlements for some or all of the following reasons:

- The Plan adopts TAYplan Policy 1 (CD022, page 8) in a very limited way which is highly restrictive for many settlements which could satisfy the requirements of Section C by merit of their ability to accommodate development and meet local needs while not undermining regeneration of the main cities.
- TAYplan Policy 1 clearly allows for development outside of principal settlements.
- The Plan's settlement strategy does not meet key rural objectives in SPP (CD004, paragraphs 14, 74, 75)
- Meeting the needs of the various sectors of the market requires the allocation of sites in smaller settlements which perform an important function in the wider area.
- Restricting growth in a settlement that is not considered a key settlement, but is one that is in a sustainable location and has capacity to accommodate development can be detrimental to a thriving community.
- There should be more emphasis on directing growth across the whole Council area.
- Developments of suitable a scale and nature, managed through the development management process, can: improve the range and type of housing in an area, provide critical support for existing facilities and services, stem rural depopulation and rural homelessness, and restrict commuting. Design solutions can avoid the 'suburbanisation of the countryside' (Policy 1C, CD022, page 8).

Greater Perth HMA

John Dewar Lamberkin Trust (0532/01/002): Support the housing strategy and Housing Land requirement for the Greater Perth Area in Table 1 (page 17) for the following reasons:

- Accords with the minimum TAYplan requirements.
- Delivery of the strategy for the Greater Perth HMA relies upon a series of strategic housing sites; providing a broad range of sites reduces the risks posed by delays.
- The range of strategic sites in the Greater Perth HMA provides long term certainty as to the direction of new growth for the next 10-15 years.
- The strategic sites bring with them significant employment land.

Duncan Scott (0626/01/002): Even during the peak period 2007 to 2009 average completion rates in the Greater Perth HMA fell short of the 540 unit per year TAYplan requirement (2017 Housing Land Audit, CD050, page 34). This suggests that, despite the LDP indicating an adequate land supply in the Plan, delivery rates will continue to fall short of the TAYplan requirement (CD022, page 23). Appealing to market constraints to justify such a delivery failure is an inadequate response. The proposed policy response under Policy 24 is also inadequate in that this is linked to a supply failure as opposed to a delivery failure.

A more robust housing land strategy is required. The allocation of more sites delivering lower levels of completions per annum per site will result in a higher overall level of completions than a more limited supply would within the same market environment. The housing land requirement therefore needs to be substantially enhanced where delivery is dependent on a smaller number of very large strategic sites as is the case in the Greater Perth HMA.

Site programming in the Housing Land Audit (CD050) is overly optimistic compared to historical completion rates which further supports increasing the housing land allocation for the Greater Perth HMA. Successive Housing Land Audits have shown ongoing difficulties in achieving delivery across many sites within the Greater Perth HMA and a substantial number of sites, particularly smaller sites, should be considered non-effective.

Perth Civic Trust (0444/01/001): LDP2 allocates land for rapid expansion of housing in Perth and the surrounding villages. If all land allocated for housing is developed the population of Perth City and the Core Area Villages together could increase by over 35% by 2040. The centre of gravity of Perth will move North West away from the existing City Centre. The level and type of development is very likely to impact on the character of Perth. The integrity of the heritage of the City centre will be jeopardised by the lack of vitality and economic activity.

Frank Stevenson (0422/01/004); Luncarty, Redgorton & Moneydie Community Council (0703/01/007): The housing provision planned for Greater Perth has a significantly higher degree of contingency than is necessary to reach TAYplan requirements (CD022, page 23)

Mr & Mrs Short (0382/01/010): Growth may be required long term but there is a danger that Perth, and in particular Scone, will become overdeveloped without the infrastructure and demand to support such a huge development.

Daisy Heriot Maitland (0077/01/002); Alan King (0405/01/003): Object to the allocation of a housing site in Dunning for some or all of the following reasons:

- It is unclear where the demand for additional houses arises from.
- It is short sighted to give up prime agricultural land for speculative housing developments.

- Dunning is not one of the places close to Perth that has been specified for expansion.

Freda Robb (0520/01/003); The Pilkington Trust (0608/01/002): Object to the allocation of an expanded Perth West site MU70 for some or all of the following reasons:

The 2017 Housing Land Audit (CD050, page 22) allocates only 550 units to the Perth West site. The housing land supply set out in the 2017 Audit is sufficient to meet the TAYplan housing land requirement for the Greater Perth HMA (CD022, page 23). Including an expanded Perth West site in the 2018 Audit (CD049) would create an over-supply of 25%. There is therefore no justification in housing land supply terms to expand the Perth West site.

Pre-recession completion rates in the Greater Perth HMA averaged 415 per year but this fell post-recession. Programming in the 2017 Audit projects completions increasing well beyond pre-recession levels. While completion rates are improving unrealistic projections should not be used to determine housing land needs; the figures should be balanced against past trends. It is purely speculative to anticipate that an extended Perth West site will increase completion rates when there is already sufficient land.

Highland HMA

ED Capital (0547/01/003): Object to the exclusion of any housing sites in Fearnan for the following reasons:

- The TAYplan sequential approach (CD022, page 8) does not prevent expansion of non-principal settlements and sites have been allocated in other non-principal settlements in the Plan at Kenmore, Murthly and Ballinluig.
- Other sites carried forward from LDP1 are not progressing and artificially inflate the housing land supply.
- The presumed building rate in the Highland HMA has not been achieved and the Council may therefore fail to maintain a 5 year effective supply of land – more land requires to be released to stimulate the stagnant market.
- The identified shortfall in supply will exacerbate the existing lack of mainstream family housing.
- The existing allocation at Aberfeldy has not progressed and therefore needs to be removed as ineffective. This site represents around 3.5 years of the HMA's land supply. Alternative sites, which are deliverable, should instead be allocated.
- There are substantial internal movement and mobility patterns within the Highland HMA suggesting a requirement for local needs housing.

Kinross HMA

Adam Neilson (0566/01/007): Although the LDP indicates that an adequate supply of housing land has been allocated to meet the TAYplan housing land requirement (CD022, page 23) for the Kinross HMA, and increased allocation should be made to ensure delivery in accordance with TAYplan.

Past completion rates are a maximum of 60 per year which indicates that the level of delivery will continue to fall short of the TAYplan requirement of 84 units per year. Appealing to market constraints to justify such a delivery failure is an inadequate response. The proposed policy response under Policy 24 is also inadequate in that this is

linked to a supply failure as opposed to a delivery failure.

A more robust housing land strategy is required. The allocation of more sites delivering lower levels of completions per annum per site will result in a higher overall level of completions than a more limited supply would within the same market environment. The housing land requirement therefore needs to be substantially enhanced where delivery is dependent on a smaller number of large sites as is the case in the Kinross HMA.

Site programming in the Housing Land Audit is overly optimistic compared to historical completion rates which further supports increasing the housing land allocation for the Kinross HMA. Successive Housing Land Audits have shown ongoing difficulties in achieving delivery across many sites within the Kinross HMA and a substantial number of sites, particularly smaller sites, should be considered non-effective.

Strathearn HMA

Ben Challum Ltd (0107/01/003): Crieff is a tier 2 settlement (CD022, page 9). SPP (CD004 paragraph 110) requires the provision of a generous land supply for each HMA. It is therefore not appropriate for the Plan to compensate under provision in land supply in one HMA with over provision in another.

Object to the means of addressing the 225 unit shortfall in the Strathearn HMA. The output from individual sites is artificially inflated to maintain supply and there is no evidence that the sites with increased capacities will deliver housing any more quickly.

Derek & Agnes Redfern (0048/01/002); Crawford Wilson (0081/01/002, 0081/02/002 & 0081/04/002); Kathleen Wilson (0167/01/002); David Wilson (0169/01/002); Martin Hogg (0227/01/001); Gillian Allan (0342/02/002); Angus Barrie (0352/01/001); Christian Campbell (0388/01/002); Lynn Manderson & James Wilson (0421/01/002); Anne Glasgow (0482/01/002); David Scott-Angell (0550/01/001); Andrew Thompson (0574/01/001); Pauline Toole (0576/01/002), Joe Toole (0579/01/002); Leslie W Paterson (0586/01/002); Felicity Martin (0638/01/004): Object to the allocation of a housing site in Comrie for some or all of the following reasons:

- The allocation is contrary to TAYplan as Comrie is not identified as a tiered settlement; it is identified as within a category of settlement where growth should be limited (CD022, pages 8-9).
- The allocated site is not 'relatively modest' but would significantly extend the settlement boundary.
- Comrie is a Green Destination (Sustainable Destinations Top 100) and this cannot and must not be jeopardised by a plan that is based on an assumption that Strathearn requires more housing.
- No new housing is required because bank closures will mean that existing businesses and working people will be leaving over the next 10 years.
- The resulting increase in population cannot be justified and significantly threatens the character and quality of Comrie's Conservation Area and status.
- A total of 330 additional houses are already included in the Plan in Crieff and Auchterarder which is 105 units above the identified shortfall.
- There is a need for a small amount of local affordable housing in Comrie, but not for the number of houses proposed for the allocated site.
- Any shortfall in requirement in Strathearn can be met by density increases at existing sites at Broich Road and Kirkton.

- The Plan appears to make no provision for increased density at the sites in Crieff and Auchterarder (Housing Background Paper, CD018, table 5) but instead proposes an increase from low to medium density on Site H58, in a small non-tiered settlement.
- There is a current oversupply of housing allocation in Crieff – 410 units against a total requirement 265 for whole Strathearn area.
- TAYplan and LDP2 are only based on assumptions and these can be wrong – why should Comrie have more housing just to meet some projected and assumed target?
- There is no basis to suggest that supply of housing is required at this site.
- No evidence that the site is effective and would contribute to housing land requirements.

Strathmore HMA

Brian Rickwood (0035/01/001); J&J Atherton (0088/01/002 & 0088/02/002); Martin Smith (0146/01/002); JB Scott (0521/01/001); Ross Millar (0708/01/002): Object to the level of development allocated to Blairgowrie for some or all of the following reasons:

- New development should be spread more evenly across the whole of Eastern Perthshire;
- Impact on the character and amenity of Blairgowrie;
- Increase is not justified by the population growth figures for Perthshire – risk that Blairgowrie will be left with empty houses;
- Blairgowrie / Rattray are not included in the TAYplan Strategic Development Area (CD022, pages 18-19) – the number of houses proposed is therefore disproportionate to the needs of the area and any possible meaningful increase in employment;
- Employment opportunities in Blairgowrie are limited – development should instead be directed to areas closer to the main centres of population and industry / commerce, namely Perth and Dundee;
- Impact of additional commuting traffic on infrastructure and the environment;
- There are already enough houses available for sale;
- Few local people want to see the town grow as rapidly as is proposed.

Gavin & Carmen Tripney (0029/01/001); Alison Bowman (0129/01/001 & 0129/02/001); George & Susan Allan (0249/01/002); Alan Palmer (0274/01/001); Peter & Patricia Murphy (0323/01/002); Tom & Lucy Boylan (0398/01/002): Object to the housing land allocation for Alyth for some or all of the following reasons:

TAYplan Policy 1 (CD022, pages 8-9) directs most new development to principal settlements where most people live and where most jobs, services and facilities are already located. Alyth is a tier 3 settlement and many people already commute out of the town for work, education, leisure and sport. Blairgowrie is tier 2 and is more self-sufficient. Utilising sites in Blairgowrie should therefore be the preferred option. Development in Alyth (of site H252 specifically) therefore runs counter to TAYplan's strategic goals and principles.

The Main Issues Report acknowledges that market conditions in Alyth suggest targets will not be reached by 2028 (CD046, page 81, paragraph 4.6.27) and that the stock of housing requirement land is already generous. The Proposed TAYplan states that 'There is not

considered to be any greater likelihood of delivering these housing supply targets simply by providing a more generous land supply. This is because the housing supply targets already imply significant generosity as a consequence of these delivery challenges. Doing so may also bring about unintended consequences for delivering the vision' (TAYplan Proposed SDP May 2015, RD033, page 29). There are already a significant number of houses with planning consent. The scale of additional housing land in Alyth therefore seems excessive and is not reflected by identified needs, by market demand or any great desire from the residents of Alyth. The reasons in the Main Issues Report (CD046) for discounting the other 4 sites are not insubstantial. The site will do little to enhance Alyth. If all developments – proposed and already consented – were to be approved this would result in a significant increase in population and have an adverse impact on infrastructure. The potential for more jobs and better infrastructure in the town seems almost non-existent; there has been no interest in the only economic development site for 20 years. There is a risk of building more houses than Alyth can properly sustain. Existing developments should be concluded before taking away greenspaces unnecessarily.

Other comments

Scottish Government (0451/01/001): The difference between the Perth and Kinross Council total Effective Housing Land Supply figure in the Plan Table 1 and in the Housing Background Paper Table 7 (CD018) has not been explained clearly in the Plan. If the difference is the impact of windfall and small sites, this should be explained more clearly in the Plan itself to comply with SPP (CD004, paragraphs 199 and 177).

Scottish Government (0451/01/003): Identifies small arithmetical issues in Table 7 of the Housing Background Paper (CD018).

Gladman Developments Ltd (0577/01/002): The Housing Supply Target is a minimum and the benefits of oversupply should be acknowledged. Flexibility in the supply can overcome some of the failure during the last plan period and this, coupled with the evident past and potential supply of housing through windfall, should be encouraged. The over-optimistic programming of sites can also have implications on local infrastructure. The TAYplan Housing Supply Target for Perth and Kinross (CD022, page 23) should therefore be expressed in the Plan to make the Plan easier and more practical to use, and offer greater clarity.

Scottish Government (0451/01/002): The amount of affordable housing in terms of units is not set out in the Plan. This does not fully comply with SPP (CD004, paragraph 128).

Modifications sought by those submitting representations:

Introductory Paragraphs

SNH (0353/01/002) 1st para, 2nd sentence pg 14: insert the word 'environment' after "Successful communities are created through their"

Vision

SNH (0353/01/002) Amend final sentence to "Our vision is for a flourishing Perth and Kinross which represents the heart of Scotland, an area which celebrates and enhances its rich natural assets and cultural heritage, and an economically dynamic and socially inclusive region providing opportunities to both existing and future residents of the area".

RSPB (0546/01/001) add "sustainable" before "culturally rich" and "with a healthy natural environment," after "...social inclusive region".

Key Objectives

SNH (0353/01/002) Add LDP Objectives 10, 12 and 13:

LDP objective 10 - Protect the natural and built environment, and ensure that new development embraces the principles of sustainable design and construction, energy efficiency and heat decarbonisation

LDP objective 12 - Conserve and enhance habitats and species of international, national and local importance

LDP objective 13 - Identify and promote green networks where these will add value to the provision, protection and enhancement, and connectivity of habitats, recreational land, and landscapes in and around settlements and active travel

RSPB (0546/01/001) amend the last objective to read: "Maintain the distinctiveness and diversity of the area through protection and enhancement of the natural and historic environment."

Theatres Trust (0454/01/001) Amend the sixth bullet point to also include 'arts' and 'cultural' alongside community, sport recreation.

Housing Land Requirement

James C Somerville (0056/01/001); Mr & Mrs Fleming (0150/01/014); John W Rogers (0304/01/001); Joyce & Mike Nairn (0671/01/001): No specific change sought but it is assumed that the respondents wish the housing supply target in the Plan to be reduced.

Jeffrey Rowlinson (0485/01/009): No specific change sought.

Rosemary Philip (0700/01/002): No specific change sought.

Stewart Milne Homes (0290/03/011): The LDP2 and subsequent housing land requirements should be amended to allow for 20% generosity.

Adjustments to the Housing Land Requirement

Reallocation from the Kinross to the Greater Perth HMA

Kinross Estate Company (0466/01/001 & 0466/01/005): The full Kinross HMA requirement should be redistributed to appropriate locations within the Kinross HMA, with a particular focus on the existing key settlements, including Milnathort. The text on page 16 should be revised accordingly, and the entry for the Kinross HMA on Table 1 on page 17 amended to:

HMA	Total HLR	Adjusted HLR	Effective Supply	Shortfall
Kinross	1,008	1,008	802	-206

Adam Neilson (0566/01/005): Alternative means of addressing the environmental impact of development on Loch Leven should be considered prior to making a reallocation to the Perth HMA, such as the allocation of brownfield sites.

Frank Stevenson (0422/01/001); Luncarty, Redgorton & Moneydie Community Council (0703/01/001): The re-allocation from the Kinross to the Greater Perth HMA should be removed from LDP2 or criteria defined as to under what measurable circumstances it will be removed in future.

Windfall Sites Assumption

Ben Challum Ltd (0107/01/006): No specific change sought.

Adam Neilson (0566/01/006); Duncan Scott (0626/01/003): Excluding windfall sites will create shortfalls in housing land supply and additional land should be allocated to address these.

Gladman Developments Ltd (0577/01/004): The Council should actively seek to approve windfall housing sites that are seen as sustainable development in line with SPP (CD004).

Frank Stevenson (0422/01/003); Luncarty, Redgorton & Moneydie Community Council (0703/01/006): The windfall assumption should be increased to 30%.

Housing Land Supply

Stewart Milne Homes (0290/03/004); Homes for Scotland (0562/01/002); A&J Stephen Ltd (0622/01/018): Further sites that are, or can become, effective should be brought forward through the LDP to meet the housing land requirement.

Housing Land Supply comments relating to specific HMAs

Stewart Milne Homes (0290/02/003); Duncan Scott (0626/01/004): Additional land should be allocated in the Greater Perth HMA. Stewart Milne Homes (0290/02/003): Site MU420 at Burrelton should be allocated for housing.

A&J Stephen Limited (0622/01/026): Site MU418 at Methven should be allocated for housing and mixed use.

Mr & Mrs P. Sloan (0655/01/002 & 0655/02/002): Site H221 or site H412 at Methven should be allocated for housing.

Wallace Land Investments (0594/01/003): Additional land should be allocated in the Kinross HMA, specifically Site H136 at West Kinross.

Adam Neilson (0566/01/002): Additional sites should be allocated in the Kinross HMA.

Kinross Estate Company (0466/01/006): Additional land should be allocated in the Kinross HMA, specifically Site H142 at Perth Road, Milnathort.

N Alexander Esq (0549/01/002): Additional land should be allocated in the Kinross HMA, specifically Site 161 at Scotlandwell.

John Beales Esq (0601/01/002): Additional land should be allocated in the Kinross HMA, specifically Site H163 at Scotlandwell.

Muir Homes (0214/03/002): Additional land should be identified for housing in Auchterarder.

Bellway Homes Limited (0559/01/002): The Council should review its approach to addressing the identified shortfall in the Strathmore HMA and release additional sites to ensure the shortfall can be addressed.

Spatial Strategy for A Successful, Sustainable Place

Perth & Kinross wide comments

Stewart Milne Homes (0290/03/005): References to the TAYplan settlement hierarchy should be removed from the LDP.

Andrew Dundas (0175/01/001): The Council should carry out full research on household needs and current trends in the demography of all settlements.

Mrs Jacqueline Edwards (0620/01/002): Housing demands should be met by erecting a new town near to main road and rail routes.

ED Capital (0547/01/004): Additional land should be allocated to meet the housing land requirement.

Gladman Developments Ltd (0577/01/001): There should be more emphasis on directing growth across the whole Council area and flexibility within the LDP to allow developments of suitable a scale and nature that can improve the range and type of housing in an area.

Errol Estate (0472/01/006); ED Capital (0547/01/002); Gladman Developments Ltd (0577/01/001); Scone Estate (0614/01/004): The Plan should allow for developments in settlements that are not defined as principal settlements.

Greater Perth HMA

Duncan Scott (0626/01/002): The housing land strategy for the Greater Perth HMA should include more small sites.

Perth Civic Trust (0444/01/001): The concentration of new residential development on the periphery of Perth should be balanced by maximising new housing development within the City.

Frank Stevenson (0422/01/004); Luncarty, Redgorton & Moneydie Community Council (0703/01/007): No specific change sought but it is assumed that the respondents wish the housing land requirement for the Greater Perth HMA to be reduced.

Mr & Mrs Short (0382/01/010): No specific change sought.

Daisy Heriot Maitland (0077/01/002); Alan King (0405/01/003): No specific change sought but it is assumed that the respondents wish the housing land strategy for the Greater Perth HMA to be changed to exclude the proposed housing allocation in Dunning.

Freda Robb (0520/01/003); The Pilkington Trust (0608/01/002): The extended MU70 site should be removed.

Highland HMA

ED Capital (0547/01/003): Additional land should be allocated in the Highland HMA and the housing land strategy should be changed to allow the inclusion of a site for housing in Fearnan.

Kinross HMA

Adam Neilson (0566/01/007): The housing land strategy for the Kinross HMA should include more small sites

Strathearn HMA

Ben Challum Ltd (0107/01/003): Additional land should be identified for housing in Crieff.

Derek & Agnes Redfern (0048/01/002); Crawford Wilson (0081/01/002, 0081/02/002 & 0081/04/002); Kathleen Wilson (0167/01/002); David Wilson (0169/01/002); Martin Hogg (0227/01/001); Gillian Allan (0342/02/002); Angus Barrie (0352/01/001); Christian Campbell (0388/01/002); Lynn Manderson & James Wilson (0421/01/002); Anne Glasgow (0482/01/002); David Scott-Angell (0550/01/001); Andrew Thompson (0574/01/001); Pauline Toole (0576/01/002), Joe Toole (0579/01/002); Leslie W Paterson (0586/01/002); Felicity Martin (0638/01/004): Site H58 in Comrie should be removed from the housing land supply for the Strathearn HMA.

Crawford Wilson (0081/01/002): Allocations within the adopted LDP should be reassessed to understand whether this site will continue to count towards the effective housing land supply in Strathearn.

Strathmore HMA

Brian Rickwood (0035/01/001); J&J Atherton (0088/01/002 & 0088/02/002); Martin Smith (0146/01/002); JB Scott (0521/01/001); Ross Millar (0708/01/002): The number of houses proposed for Blairgowrie should be reduced.

Brian Rickwood (0035/01/001): New development should be spread more evenly across the whole of Eastern Perthshire.

Ross Millar (0708/01/002): Development should be directed to areas closer to the main centres of population and industry / commerce, namely Perth and Dundee.

Gavin & Carmen Tripney (0029/01/001); Alison Bowman (0129/01/001 & 0129/02/001); George & Susan Allan (0249/01/002); Alan Palmer (0274/01/001); Peter & Patricia Murphy (0323/01/002); Tom & Lucy Boylan (0398/01/002): The number of houses proposed for Alyth should be reduced.

Other comments

Scottish Government (0451/01/001): The final two columns of table 7 in the Housing Background paper (CD018) should be incorporated into table 1 of the Plan.

Scottish Government (0451/01/003): Small arithmetical issues in Table 7 of the Housing

Background Paper (CD018) should be corrected.

Gladman Developments Ltd (0577/01/002): The TAYplan Housing Supply Target (CD022, page 23) for Perth and Kinross should be expressed in the Plan.

Scottish Government (0451/01/002): The number of new affordable housing units should be set out within the Plan.

Summary of responses (including reasons) by planning authority:

Introductory Paragraphs

SNH (0353/01/002) It is not considered necessary to include the word 'environment' in this paragraph as the role of the environment in creating successful places is more appropriately covered in the introductory paragraphs to section 3.3 A Natural Resilient Place.

No modification is proposed to the Plan. However, if the Reporter is so minded the local authority would be comfortable with this additional wording being inserted as it would not have any implications for any other aspect of the Plan.

Vision

SNH (0353/01/002); RSPB (0546/01/001) It is not considered necessary to amend the vision in this chapter to include reference to natural heritage and environmental sustainability as this is covered in section 3.3 A Natural Resilient Place.

No modification is proposed to the Plan. However, if the Reporter is so minded the local authority would be comfortable with either of the additional wordings suggested being inserted as it would not have any implications for any other aspect of the Plan.

Key Objectives

SNH (0353/01/002): It is acknowledged that LDP Objectives 10, 12 and 13 (listed in Table 9 of the SEA Addendum to the Environmental Report (CD067) have a relevance to this section, however, these objectives are considered to be more directly linked to policies contained within the other policy sections in the Plan, and have therefore been listed there.

No modification is proposed to the Plan.

RSPB (0546/01/001): It is contended that the Plan is consistent with paragraph 13 of SPP (CD004) and that its contribution to "Outcome 3: A natural, resilient place is addressed" in policy section 3.3 of the Plan entitled 'A Natural, resilient Place.

No modification is proposed to the Plan.

Theatres Trust (0454/01/001): Whilst it is not considered necessary to include the suggested amendments, the Council would have no objection to this as it would not have any implications for any other aspect of the Plan.

No modification is proposed to the Plan. However, if the Reporter considered it

appropriate to include the requested modification, the Council would be comfortable with this approach.

Housing Land Requirement

James C Somerville (0056/01/001); Mr & Mrs Fleming (0150/01/014); John W Rogers (0304/01/001); Joyce & Mike Nairn (0671/01/001): SPP requires that strategic development plans set out the housing land requirement for each local authority area and HMA (CD004, paragraph 118). Extensive research was carried out to inform the preparation of TAYplan 2, including a Housing Needs and Demand Assessment (CD045). This Assessment brought together a wide variety of data, including population and household projections, and was confirmed as 'robust and credible' by the Scottish Government Centre for Housing Market Analysis on 24 February 2014 (CD045). As with the Proposed LDP2, TAYplan 2 was subject to full consultation at all stages with stakeholders and the general public. TAYplan 2 was approved by Scottish Ministers in October 2017. In the Examination Report the Reporter clearly states that he has 'set out the housing land requirement for the various individual HMAs within Perth & Kinross' (CD059, page 226, paragraph 36).

It is acknowledged that, since the Proposed LDP2 was prepared, new population projections have been published. The TAYplan Examination Reporter considered (in relation to household projections) that these projections 'provide no substitute for a comprehensive housing need and demand assessment. Such assessments contain a much more sophisticated analysis of the range of factors that may affect future need and demand....I give these projections only a limited amount of weight' (CD059, page 221, paragraph 10). It is considered that the same view can be taken of the most recent population projections. The housing land requirement is set by TAYplan and the Proposed LDP2 must conform to this higher level Plan.

The decisions which have allowed some major developments to start were made taking full account of the infrastructure required, and the stage at which it will be needed.

No modification is proposed to the Plan.

Jeffrey Rowlinson (0485/01/009); Rosemary Philip (0700/01/002): It is suggested that the housing requirements for Dunning and for the Scone area do not accurately reflect the level of need but there is no requirement to set a housing land requirement for individual settlements. The site allocations at Scone and Dunning are a key part of a range of sites which have been allocated within the Perth Area to meet the housing land requirement for the Greater Perth HMA. The respondents perhaps fail to recognise that whilst some strategic sites may have thousands of houses the critical factor in maintaining an effective 5 year housing land supply is the number delivered per year. The allocations in Dunning and Scone, both with proven market demand are key to providing market choice and maintaining an effective supply.

No modification is proposed to the Plan.

Stewart Milne Homes (0290/03/011): In their representation Stewart Milne Homes request that the margin of increased flexibility between the housing supply target and the housing land requirement is increased to the maximum 20% – SPP suggests a range of 10-20% (CD004 paragraph 116). Stewart Milne Homes participated in the Examination of TAYplan 2. It is therefore assumed that this respondent is aware that in strategic development

planning areas the housing supply target, flexibility margin, and the resulting housing land requirement is to be set by the strategic development plan in accordance with SPP (CD004, paragraph 118). In setting the 18% flexibility margin the TAYplan Examination Reporter concluded that ‘...the application of an 18% generosity margin that produces the same housing land requirement as is set out in the Proposed Plan for Perth and Kinross is the most pragmatic way to ensure that the plan contains a more realistic housing supply target and housing land requirement for this area, whilst also ensuring that national policy requirements relating to the housing land supply are fulfilled.’ (CD059, page 226, paragraph 35).

No modification is proposed to the Plan.

Adjustments to the Housing Land Requirement

Reallocation from the Kinross to the Greater Perth HMA

Frank Stevenson (0422/01/001); Kinross Estate Company (0466/01/001); Adam Neilson (0566/01/005); Luncarty, Redgorton & Moneydie Community Council (0703/01/001): TAYplan Policy 4 (CD022, page 22) requires LDPs to identify sufficient land to meet the housing land requirement within each HMA. Part D of Policy 4 does, however, allow for the reallocation of a proportion of the housing land requirement to another HMA for areas where there are serious environmental or infrastructure capacity constraints. The 10% reallocation from the Kinross HMA to the Greater Perth HMA is a continuation of the approach taken for the adopted LDP and is due to the continued risk of adverse impact on the Loch Leven Special Protection Area and National Nature Reserve of seeking to meet the housing land requirement arising in the Kinross HMA in full. Whilst the ideal is for housing need and demand to be met within the HMA it arises, the reallocation of 10% of the housing land requirement from the Kinross to the Greater Perth HMA amounts to 8-9 houses per year, or 101 in total over the period to 2028 (Housing Background Paper, CD018, Table 3). It is not considered that an annual reduction in housing in the Kinross HMA of this scale will have a significant adverse impact. Despite the reduction there is still a requirement for the allocation of land for over 800 houses in the Kinross HMA in the period to 2028.

It is acknowledged that, as for all HMAs, there is also a 10% windfall allowance applied to the calculation of the housing land requirement for the Kinross HMA. Whilst this does reduce the amount of land which requires to be allocated in LDP2, all the windfall allowance does is take into account those developments which are expected to take place on sites which are not specifically allocated in the Proposed LDP2 – it does not serve to reduce the number of houses which will be built in the Kinross HMA in the way that the reallocation does.

Brownfield sites have already been taken into account in the identification of the housing land supply. In identifying those sites to include within the Proposed LDP2 as allocations, the Council considers brownfield sites which meet the ‘effectiveness’ criteria set out in PAN 2/2010 (CD040, paragraph 55). Furthermore, the housing land supply calculation includes an assumption that 10% of the housing land requirement will be met on windfall sites. The vast majority of windfall sites are brownfield. The allocation of brownfield sites which are currently in another use is therefore not considered a realistic alternative to the reallocation of 10% of the Kinross HMA housing land requirement to the Greater Perth HMA.

The Loch has been degraded over the last 150 years by the addition of phosphates through man made activities. The Strategic Environmental Assessment of the adopted LDP (CD368, pages 64-80) identified a particularly high level of constraint in the Kinross HMA primarily due to the potential for significant adverse impact on Loch Leven. Adopted LDP policy EP7 (CD014, page 55) sought to ensure that there was no adverse impact from new development on Loch Leven and this has helped improve the ecological status of the Loch.

Whilst much of the Kinross HMA was identified as being free from or with only limited strategic constraints (CD368, page 72), this does not mean that there is scope for significantly more development as housing land allocations still have to accord with the TAYplan and LDP strategies of directing the most growth to the largest settlements. Kinross / Milnathort are the only TAYplan tiered settlements in the HMA (CD022, page 9) and they are both within the Loch Leven Catchment area. In light of the above, and in accordance with the precautionary principle, it is still considered appropriate to recognise the continuing vulnerability of the Loch arising from additional development within the Catchment Area and to seek to reduce this by reallocating a proportion of the housing land requirement to the adjacent Greater Perth HMA. Whilst it is recognised that there are also environmental issues in the Greater Perth HMA there is considered to be more than enough scope in this area to absorb the additional 8-9 units per year. The reallocation amounts to approximately 1.7% of the Greater Perth HMA housing land requirement.

The dis-benefits of reallocating 10% of the housing land requirement from the Kinross HMA to the Greater Perth HMA are considered minimal. When this is balanced against the potential positive effects in reducing the impact of additional development on the Loch Leven Special Protection Area and National Nature Reserve, the reallocation is still considered an appropriate and sustainable approach.

No modification is proposed to the Plan.

Windfall Sites Assumption

Ben Challum Ltd (0107/01/006): The support from Ben Challum Ltd for the windfall assumption appears to be based on the misunderstanding that 10% is a maximum figure and the amount of windfall land will be restricted to 10%. As discussed further in the paragraphs below, past completions have shown that the amount of development on windfall land has historically been significantly higher. Policy 17: Residential Areas offers encouragement to appropriate infill residential development and to seek to restrict the level of windfall development would be in conflict with this policy.

Frank Stevenson (0422/01/003); Kinross Estate Company (0466/01/005); Adam Neilson (0566/01/006); Gladman Developments Ltd (0577/01/004); Duncan Scott (0626/01/003); Luncarty, Redgorton & Moneydie Community Council (0703/01/006): It is acknowledged that the guidance in PAN 2/2010 (CD040, paragraph 62) is not to count windfall towards meeting the housing land requirement. It should be noted, however, that PANs are guidance rather than policy.

During the Examination of the adopted LDP the Reporter acknowledged the difficulty for a Proposed Plan, prepared within a plan led system, which relies on sites which come forward for development unexpectedly (CD015, page 312, paragraph 12). The Reporter therefore sought, by means of a request for further information, evidence for each HMA which demonstrated that windfall sites have consistently become available over the

previous 5 years, and therefore the amount that was on the balance of probabilities likely to come available over the next 5 years (CD015, page 312, paragraph 13 & CD060). On the basis of the evidence provided the Reporter concluded that ‘...it is possible to agree with the Council that the 10% windfall sites allowance is a conservative estimate based on an analysis of past completions on sites that have come forward as windfalls rather than being part of the planned supply. Consequently there is no need to remove that allowance from the calculation of the additional land required to meet the projected building rate’ (CD015, page 313, paragraph 13).

Since then the Council has published, as part of the annual housing land audit, the number of completions on windfall sites. The Housing Land Audit 2016 (upon which the housing land supply calculations are based) shows that in the 5 year period 2012-16 an average of 52% of all completions on sites of 5 units or more were on windfall sites (CD051, page v). The 10% windfall allowance therefore continues to be a very conservative allowance of the contribution from windfall sites.

The adoption of a conservative allowance is to guard against the possibility that, following the adoption of the new LDP2, the number of windfall sites coming forward will slow down given that the new Plan will identify a range of new sites (although this has not been the experience following the adoption of LDP1). Furthermore, as the Examination Reporter for the adopted Plan noted, the LDP is prepared under a plan led system and as such a 10% windfall allowance is considered to strike an appropriate balance between maintaining the plan led approach, and reflecting what actually happens on the ground (CD015, pages 312-313, paragraphs 12-13).

Windfall sites are defined in the Proposed LDP2 as those sites which become available for development unexpectedly. Given past trends, the assumption that 10% of the housing land requirement will be met on windfall sites is considered both reasonable and realistic but the precise sites which will become available for development are generally unknown. Policy 17: Residential Areas already has a presumption in favour of sites coming forward for residential and compatible uses on undesignated land within settlement boundaries. Given the nature of windfall sites it is difficult to see what more the Council can do to facilitate them through the LDP.

Far from placing a reliance on unplanned development to meet the housing land requirement, the inclusion of an assumption that 10% of the requirement will be met on sites which are currently undesignated is a realistic, balanced and proportionate response. On this basis the Council considers that the retention of the 10% windfall allowance in the calculation of the housing land requirement for LDP2 is appropriate.

No modification is proposed to the Plan.

Housing Land Supply

Stewart Milne Homes (0290/03/004); Homes for Scotland (0562/01/002); A&J Stephen Limited (0622/01/018): The inclusion of an adjusted total in the annual housing land audit programming summary (CD051, page ix) is simply intended to give an indication of what is realistically expected to be built. The failure of sites to deliver as quickly as they are programmed is due to the current economic climate rather than any issues with the sites themselves. The speed at which sites are developed lies largely with the development industry and as such is outwith the control of the Council. The economic climate and availability of finance will continue to be the main influences on delivery and on this basis it

is not appropriate to allocate even more sites as these are unlikely to be brought forward any quicker than those already identified in the Plan.

The fact remains that, in line with TAYplan Policy 4 (CD022, page 22) and as set out in the Housing Background Paper (CD018), sufficient land has been identified in each HMA to meet the housing land requirement. Furthermore, there is an allowance already built into the housing land requirement to ensure that there is a supply of land to meet the housing supply target in the event that some sites fail to come forward or take longer than expected to deliver. For the purposes of calculating the housing land supply it is therefore inappropriate to use the adjusted total from the housing land audit programming summary.

The Housing Background Paper (CD018) was prepared alongside the Proposed LDP and was approved by the Council in November 2017. This sets out the housing land supply position using the 2016 Housing Land Audit (CD051) which was the most up to date published data available at that time. Additional housing land allocations were made in the Proposed Plan to meet the shortfalls which were identified in the Housing Background Paper.

The methodology used by Homes for Scotland at paragraph 2.10 of their representation compares the 12 year housing land requirement against an 11 year supply by deducting 2016/17 completions. This results in an immediate shortfall as completions in 2016/17 of 586 fell well below the annualised housing land requirement of 1,000 units. As abovementioned, however, this is not down to a lack of supply but rather that sites have simply not delivered in the timescales which they could have been if market conditions were more favourable. Several of the sites in the land supply are capable of higher delivery rates should the market support this.

It is acknowledged that since the Proposed Plan went out for consultation the 2017 Housing Land Audit has been published (in November 2017). However, it is not realistic or appropriate to recalculate the entire housing land supply position based on the 2017 Housing Land Audit at this late stage in the process. TAYplan Policy 4 requires land to be allocated to meet the requirement for the period 2016-28 and it is therefore considered appropriate to continue to use the base date of 2016 in calculating the additional allocations needed to meet the housing land requirement.

It is acknowledged that TAYplan requires consideration of the whole period from 2016-28 rather than on an annual basis (CD022, page 22) but, as previously mentioned, the shortfall in annual completions to meet the annual housing land requirement is not down to an inadequate supply but a failure of the industry to deliver. It is hoped that completions in later years will be much closer to, or even exceed, the annual housing land requirement but this is totally dependent on the rate of market recovery. It is likely to take some time for completion rates to reach pre-recession levels. Action 12 of the Joint Housing Delivery Plan for Scotland (CD061, page 22) highlights that the economic crisis has seen many people leave the construction industry. This has impacted on the ability of the development industry to deliver new housing. During the TAYplan 2 Examination Homes for Scotland also acknowledged the 'challenging nature of the housing supply target set for Perth & Kinross due to the much lower levels of past and projected delivery' (CD059, page 221, paragraph 11).

To add annual shortfalls in completions to the overall need for additional housing land runs the risk of the Council having to continually increase the supply of housing land, potentially with detrimental impacts on local communities and the environment, with little hope of

actually increasing the output particularly in the early years of market recovery. Should there not be an economic improvement then the additional supply will not be needed because the development industry will not be able to deliver the higher house numbers due to the lack of finance both to the construction industry and to house purchasers. The Examination Reporter for LDP1 reinforced this view concluding that ‘...problems with marketability stem from weakness on the demand side and these cannot be solved by an increase in supply by way of further releases of land’ (CD015, page 313, paragraph 17).

No modification is proposed to the Plan.

Housing Land Supply comments relating to specific HMAs

Land has been identified in each HMA to meet the housing land requirement in the period to 2028. Sites have been identified in accordance with the locational priorities set out in TAYplan Policy 1 (CD022, page 8). Where a shortfall in supply was identified following the Main Issues Report, the Housing Background Paper (CD018) sets out how this has been addressed in Proposed LDP2.

Stewart Milne Homes (0290/02/003); A&J Stephen Limited (0622/01/026); Duncan Scott (0626/01/004); Mr & Mrs P. Sloan (0655/01/002 & 0655/02/002): There is a significant surplus in housing land supply in the Greater Perth HMA (Housing Background Paper, CD018, page 5). There is, therefore no need to identify additional land in the Greater Perth HMA. Across the Perth Core Area a range of sites have been identified to meet the housing land requirement for the Greater Perth HMA. In identifying which sites to allocate consideration was given to how well the site would relate to the rest of the settlement, and any infrastructure capacity issues. As discussed under the ‘Housing Land Requirement’ section above, there is no requirement to set a housing land requirement for individual settlements. It is therefore considered incorrect to state that the land supply for Methven is insufficient to satisfy TAYplan’s locational and strategic housing requirements, or to deliver the spatial strategy. As discussed under section ‘Windfall Sites Assumption’ above, windfall sites have in the past made a significant contribution to the housing land supply, yet only a conservative assumption of 10% is included within the housing land supply calculation. The fact that a settlement boundary alteration will create a windfall site is not therefore considered adequate justification for changing the boundary.

Kinross Estate Company (0466/01/006); N Alexander Esq (0549/01/002); Adam Neilson (0566/01/002); Wallace Land Investments (0594/01/003); John Beales Esq (0601/01/002): In the Kinross HMA the allocation of an additional site at Crook of Devon and a review of site capacities are more than sufficient to meet the very small shortfall identified (Housing Background Paper, CD018 page 6). The allocation of longer term sites is discussed under Issue 12 Policy 24: Maintaining an Effective Housing Land Supply. The windfall assumption and reallocation to the Greater Perth HMA are discussed under ‘Adjustments to the Housing Land Requirement’ section above. It is not disputed that the allocation of site H161 in Scotlandwell could potentially deliver affordable houses but it is not considered that this in itself justifies the allocation of the site for housing. It should also be noted that the current supply of housing land in Scotlandwell (site H54) is likely to serve the needs of the village beyond the Plan period. Given the modest market demand in this area an additional site may not increase the effective supply.

Muir Homes (0214/03/002): As discussed above, the housing land supply calculation was based on the 2016 Housing Land Audit which was the most up to date published data available at that time (CD051). The decision was taken for the Strathearn HMA to increase

densities on two existing allocations at Broich Road, Crieff and at North West Kirkton, Auchterarder (MU7 and H228). The additional supply of 330 units arising from this was more than sufficient to meet the 225 unit shortfall identified over the 12 year period to 2028 (Housing Background Paper, CD015, page 6). The site programming in the 2017 Housing Land Audit (CD050) does not include this additional supply coming forward from increased capacities as, at the time of publication of the Audit, these changes had not been approved by the Council. The increased capacities are reflected in the Draft 2018 Housing Land Audit (CD049). At the time of writing, the Draft 2018 Audit is out for consultation but as it currently stands the land supply from 2023/24 onwards at the Auchterarder Development Framework sites (including North West Kirkton) has increased from 102 in the 2017 Audit (CD050, page 24) to nearly 400 in the draft 2018 Audit (CD049, page 24). In Crieff the land supply beyond 2023/24 has increased by 70 units to 265 (CD049, page 25). The position remains largely the same in the Strathearn Landward Area. Although the exact numbers may change this clearly demonstrates that there is a supply of housing land in the Strathearn HMA both in the short and longer term and no additional allocations are therefore required.

Bellway Homes Limited (0559/01/002): Issues relating to the deliverability of specific sites in the Strathmore HMA are addressed under Issue 46: Strathmore and the Glens Area – Blairgowrie and Rattray, and Issue 45: Strathmore and the Glens Area – Alyth and New Alyth. Policy 24: Maintaining an Effective Housing Land Supply sets out how any future shortfall in housing land supply will be addressed.

Overall the Council is satisfied that the sites identified in Proposed LDP2 to meet the housing land requirement in each of the HMAs are effective. No further allocations are therefore required to meet the housing land requirement during the period to 2028 in any of the HMAs across Perth & Kinross.

No modification is proposed to the Plan.

Spatial Strategy for A Successful, Sustainable Place

Perth & Kinross wide comments

Stewart Milne Homes (0290/03/005): TAYplan sets the spatial strategy with which the LDP must accord.

Andrew Dundas (0175/01/001): Extensive research was carried out to inform the preparation of TAYplan2 including environmental assessments, Housing Needs and Demand Assessment, and infrastructure capacity work (CD022, page10). The TAYplan Strategic Development Plan Authority comprises Perth & Kinross, Angus, Dundee City, and Fife Councils. Officers from each Council together with the TAYplan Strategic Development Plan Authority Team carried out the research, in other words, this is Perth & Kinross Council's research. The Council therefore disputes the suggestion that inadequate research was carried out to inform the spatial strategy for Proposed LDP2.

No modification is proposed to the Plan.

Mrs Jacqueline Edwards (0620/01/002): In order to protect and enhance the role of the towns and cities TAYplan specifically states that 'there will be no need for any new settlements during the lifetime of this Plan' (CD022, page 11). The LDP must conform with the higher level Strategic Development Plan. TAYplan sets out a spatial strategy to deliver

a sustainable pattern of development by directing most new development to principal settlements. These are the towns and cities where most people live and work. They also have the land and infrastructure capacity to be able to accommodate new development (CD022, page10). Perth & Kinross Council has opted for the strategic expansion of Perth to the north and north-west, and the Proposed LDP2 sets out the infrastructure required for this expansion.

No modification is proposed to the Plan.

ED Capital (0547/01/004): As above-mentioned under 'Housing Land Strategy', the slow rate of housing completions is not due to a failure of the spatial strategy. It is a result of the overall economic climate and the failure or inability of the development industry to deliver houses on the ground. The spatial strategy set out in TAYplan, with which the LDP must conform, was approved by Scottish Ministers on 11 October 2017.

No modification is proposed to the Plan.

ED Capital (0547/01/002); Errol Estate (0472/01/006); Gladman Developments Ltd (0577/01/001); Scone Estate (0614/01/004): In accordance with TAYplan the majority of development is directed to the principal settlements. It is acknowledged that the LDP can allocate land in non-principal settlements where they accord with the criteria set out in TAYplan Policy 1C (CD022, page 8) and there are several allocations in the Proposed LDP which fall within this category. During the previous Examination, however, the Reporter removed a number of sites in non-principal settlements on the grounds that sufficient land had already been allocated to deliver the housing land requirements of TAYplan within, or on the edge of principal settlements (CD015, page 549 (Forgandenny), page 550 (Abernethy)). For Proposed LDP2 the majority of allocations in non-principal settlements are those which have already been through the Examination process and carried forward from LDP1. The detailed assessments of the various sites being promoted by the respondents against TAYplan Policy 1C are considered in the relevant settlement Schedule 4.

TAYplan Policy 1C sets out three criteria; proposals for development falling within this category must meet all three of these criteria, including the requirement to genuinely contribute to the outcomes of TAYplan. It is acknowledged that additional development in small settlements can help meet the needs of the various sectors of the market. The Council, however, refutes the suggestion that the LDP's settlement strategy does not meet the key rural objectives in the SPP (CD004, paragraphs 74 and 75). Many of the smaller settlements have boundaries drawn to allow for small scale infill development to come forward and be assessed against the existing policy framework. Policy 19: Housing in the Countryside and Policy 8: Rural Business and Diversification allow for appropriate development to come forward in those settlements which do not have boundaries defined. The Council's decision not to include what is often a large expansion to an existing small settlement does not constitute a failure of the LDP to meet the SPP objectives.

Overall the Council considers that the allocations contained within Proposed LDP2 meet the TAYplan requirement to allocate land to meet the housing land requirement in accordance with the spatial strategy set out in TAYplan Policy 1 (CD022, page 8).

No modification is proposed to the Plan.

Greater Perth HMA

Daisy Heriot Maitland (0077/01/002); Mr & Mrs Short (0382/01/010); Alan King (0405/01/003); Frank Stevenson (0422/01/004); Perth Civic Trust (0444/01/001); Duncan Scott (0626/01/002); Luncarty, Redgorton & Moneydie Community Council (0703/01/007): As discussed above under 'Housing Land Strategy', it is not considered that the allocation of additional sites will result in an increase in the rate of house completions. The Council maintains that the low completions rate is as a result of delivery failure and not supply failure. In accordance with TAYplan Policy 4 (CD022, page 22) sufficient land has been allocated in the Proposed LDP2 to meet the housing land requirement. The annual Housing Land Audit is prepared in consultation with Homes for Scotland and their member organisations. In the vast majority of cases agreement is reached on the programming and deliverability of the sites contained within the Audit. Any disputes are noted. There were no disputed sites in the 2016 Audit upon which the calculations for the Proposed LDP2 are based. The Council therefore refutes the suggestion that a substantial number of sites in the Audit should be considered non-effective. It is acknowledged that, whilst programming in the Audit reflects a site's potential, Council wide the total programming is likely to be an over-estimate of actual delivery due to market conditions. As is stated in the Audit, however, 'in the event of a more rapid [market] recovery the identified sites have not only the potential to deliver the number of houses identified in the Housing Land Audit but in many cases they could deliver higher numbers' (CD051, page ix).

In the representation by Duncan Scott it is suggested that 'the allocation of more sites delivering lower levels of completions per annum per site will result in a higher overall level of completions'. However no evidence has been submitted to substantiate this claim. It is suggested that the allocation of additional sites in the Greater Perth HMA could have the opposite effect and could even prejudice the bringing forward of the Strategic Development Areas in the Perth Core Area. At the Examination for LDP1 it was acknowledged that there were challenges to be overcome in the delivery of the strategic sites (CD015, page 302). Since then, however, Bertha Park (MU345) has been granted planning consent and is under construction. Sites at Almond Valley (MU73) and Perth West (MU70) are moving forward with the help of Perth & Kinross Council. These strategic expansion sites are of such a scale that they are better able to deliver the infrastructure and services necessary than numerous smaller piecemeal developments which are generally less likely to be able to contribute and could therefore put undue pressure on existing services and infrastructure. Furthermore the concentration of development to the north and west of Perth offers the opportunity to link these strategic sites to shared infrastructure improvement thus making them more economically viable and deliverable. The approach taken by the Council is considered robust. The Council does not therefore consider that the housing land supply should be 'substantially enhanced' as suggested in the representation.

No modification is proposed to the Plan.

Representations have also been submitted which suggest that the housing land supply for the Greater Perth HMA is too high and that it is unclear as to where the demand for additional houses arises from. The housing land requirement set out in TAYplan was derived from the Housing Needs and Demand Assessment which sets out both the need for affordable housing and the demand for market housing (CD045). In line with TAYplan Policy 1 the vast majority of new development is directed to the principal settlements. In Perth & Kinross the only tier 1 settlement is the Perth Core Area which includes Perth and those principle settlements surrounding the City (CD022, pages 8-9).

Particular concerns are raised in representations regarding the allocations at Scone and Dunning. The detailed consideration of these sites is set out under Issue 29: Perth Core Settlements and Issue 31: Greater Perth South and West – Outwith Core. TAYplan Policy 1: Location Priorities directs LDPs to focus the majority of development in principal settlements (CD022, page 8). In line with the Strategic Development Plan, the majority of the housing land requirement in the Greater Perth HMA will be met within defined settlements of the Tier 1 Perth Core Area. This includes Scone. Dunning does not fall within the Perth Core Area but TAYplan does also allow for some development in non-principal settlements providing that it meets the criteria set out in TAYplan Policy 1C (CD022, page 8). The principle of a housing land allocation in Dunning has been carried forward from the adopted LDP.

The concerns raised by the Perth Civic Trust, relating to a potential shift in the centre of gravity away from the City centre, are acknowledged but the reality is that the opportunities for the strategic expansion of Perth are limited by geography. The existing policy framework seeks to protect and enhance the viability and vitality of the City centre but it must be recognised that all towns and cities will evolve and change with new development. It is not therefore considered appropriate to change the spatial strategy for the Greater Perth HMA.

It is acknowledged that there is a significant volume of new housing sites allocated in the Perth Core Area. It must be remembered, however, that this is a very long term supply of housing land. The large strategic sites north and west of Perth City will extend well beyond the Plan period of 2028, for example, the Bertha Park site (MU345) delivering 100 houses per year will take more than 30 years to reach completion. As abovementioned, the strategic sites are of a scale to be able to deliver the necessary infrastructure and services. It is precisely because these sites, both in Perth and in other settlements within the Core Area, are so big that it allows the infrastructure and services to be properly planned in advance and much more effectively than would be the case for numerous smaller scale ad hoc developments.

Whilst the housing land supply in the Greater Perth HMA is more than that required by TAYplan, there is nothing in either TAYplan or SPP which prevents the Council from providing more land than is necessary to meet the housing land requirement. The housing land supply in the Greater Perth HMA is heavily reliant on strategic sites. A generous supply of land is therefore essential to ensure that the housing land requirement can still be met should any of these strategic sites stall or fail to deliver as quickly as anticipated. It is also necessary to support the significant investment in infrastructure by both developers and the Council. Ultimately, developers will only build what the market can absorb and the oversupply has the added benefit of providing significant certainty to both developers and communities as to where growth will, and will not, take place over the next 30-40 years.

The Pilkington Trust (0608/01/002); Freda Robb (0520/01/003): In relation to the proposal to extend the Perth West site MU70, it is acknowledged that on the surface it would appear that there is no necessity to expand this site in order to meet the housing land requirement. The justification for the MU70 expansion is considered under Issue 25: Perth Strategic Development Area. As above-mentioned, the housing land requirement is derived from the Housing Need and Demand Assessment. It is not based on the programming information set out in the 2017 Housing Land Audit.

No modification is proposed to the Plan.

Highland HMA

ED Capital (0547/01/003): It is acknowledged that TAYplan does allow LDPs to allocate sites in non-principal settlements providing that they meet the criteria set out in TAYplan Policy 1C (CD022, page 8). As above-mentioned, generally the reason for those sites carried forward from LDP1 failing to deliver is down to market conditions rather than issues with the sites themselves. It is not therefore considered that the allocation of yet more sites in the Highland HMA will 'stimulate the stagnant market' in the way that the respondent suggests. As set out in the Housing Background Paper, the housing land shortfall in the Highland HMA is a mere 3 units which can very easily be accommodated with the 18% flexibility allowance which has been added to the housing land requirement (CD018, page 5-6).

The site at H36 in Aberfeldy has progressed more slowly than anticipated, again, due to the general slowing down of the market which has been experienced across much of Perth & Kinross. The Council are, however, satisfied that this site is effective and will deliver within the lifetime of this Plan. Aberfeldy is a tier 3 principal settlement and is therefore to be preferred as a location for new housing development over non-principal settlements, including those put forward by the respondent, in line with TAYplan Policy 1.

No modification is proposed to the Plan.

Kinross HMA

Adam Neilson (0566/01/007): In accordance with TAYplan Policy 4 (CD022, page 22), and as detailed in the Housing Background Paper (CD018), sufficient land has been allocated or is expected to become available in the Kinross HMA to meet the housing land requirement. The annual Housing Land Audit is prepared in consultation with Homes for Scotland and their member organisations and the programming and deliverability of these sites is agreed. The Council therefore refutes the suggestion that a substantial number of sites in the Kinross HMA contained in the Audit should be considered non-effective. It is acknowledged that, whilst programming in the Audit reflects a site's potential, Council wide the total programming is likely to be an over-estimate of actual delivery due to market conditions. As is stated in the Audit, however, 'in the event of a more rapid [market] recovery the identified sites have not only the potential to deliver the number of houses identified in the Housing Land Audit but in many cases they could deliver higher numbers' (CD051, page ix).

In the representation by Adam Neilson it is suggested that 'the allocation of more sites delivering lower levels of completions per annum per site will result in a higher overall level of completions'. However no evidence has been submitted to substantiate this claim. As discussed above under 'Housing Land Supply', it is not considered that the allocation of additional sites will result in an increase in the rate of house completions. The Council maintains that the low completions rate is as a result of delivery failure and not supply failure. The Council does not therefore consider that the housing land supply should be 'substantially enhanced' as suggested in the representation.

No modification is proposed to the Plan.

Strathearn HMA

Ben Challum Ltd (0107/01/003): The representation from Ben Challum appears to be a

misunderstanding of the way in which HMAs are defined – Crieff is not a HMA in itself but is part of a wider Strathearn HMA which includes Crieff, Auchterarder and a number of smaller settlements (page 18).

As discussed under ‘Housing Land Supply’ above, the individual site programming set out in the annual Housing Land Audit is an assessment of what could be delivered on each site should the market support this. The programming information is not, as suggested by the respondent, artificially inflated in order to maintain supply. In the Strathearn HMA the identified shortfall is to be met from increased densities on two existing sites with a proven ability to accommodate increased numbers (Housing Background Paper, CD018, Table 5). This is considered to be the best way of addressing the shortfall in land supply in this area as there is capacity within the existing allocation and it therefore makes the best use of existing allocated land rather than identifying new sites.

No modification is proposed to the Plan.

Derek & Agnes Redfern (0048/01/002); Crawford Wilson (0081/01/002, 0081/02/002 & 0081/04/002); Kathleen Wilson (0167/01/002); David Wilson (0169/01/002); Martin Hogg (0227/01/001); Gillian Allan (0342/02/002); Angus Barrie (0352/01/001); Christian Campbell (0388/01/002); Lynn Manderson & James Wilson (0421/01/002); Anne Glasgow (0482/01/002); David Scott-Angell (0550/01/001); Andrew Thompson (0574/01/001); Pauline Toole (0576/01/002), Joe Toole (0579/01/002); Leslie W Paterson (0586/01/002); Felicity Martin (0638/01/004): The detailed consideration of site H58 in Comrie is set out under Issue 43: Strathearn Area – Settlements with Proposals. In relation to the principle of allocating a site in a non-tiered settlement, as above-mentioned, TAYplan Policy 1: Location Priorities directs LDPs to focus the majority of development in principal settlements (CD022, page 8). In line with the Strategic Development Plan, the majority of the housing land requirement in the Strathearn HMA will be met within the principal settlements of Auchterarder and Crieff. TAYplan does, however, also allow for some development in non-principal settlements providing that it meets the criteria set out in TAYplan Policy 1C. On this basis an additional housing land allocation in Comrie has been carried forward from the adopted LDP.

The allocation of site H58 was considered at the previous Examination. The previous Reporter concluded that ‘the vast majority of the additional housing requirement..., apart from the site for 30 houses in Comrie, is located within the two principal settlements. It is also the case that the TAYplan housing land requirement figure is not a maximum to be provided but a minimum to be achieved. It is difficult to argue, therefore, that the designation of site H58 for 30 houses is contrary to the TAYplan spatial strategy.’ (CD015, page 826, paragraph 2). The decision was taken in preparing the adopted Plan that, in line with the Strategic Development Plan (then TAYplan1), limited growth would be allocated to those non-tiered settlements which have a range of facilities capable of serving local needs. This included Comrie. This approach is still in line with TAYplan2 and the principle of allocating site H58 for housing is therefore still considered appropriate.

The housing land requirement for the Strathearn HMA has been set by the higher level TAYplan with which the LDP must comply. The housing land requirement was informed by the TAYplan-wide Housing Needs and Demand Assessment (CD045).

It is acknowledged that the final land supply position as set out in Table 7 in the Housing Background Paper shows a surplus of 105 units in the Strathearn HMA (CD018, page 6). It must be remembered, however, that this is over a 12 year period and amounts to less

than 9 houses per year across the whole of the HMA. Whilst the vast majority of the housing land supply in the Strathearn HMA is within the two principal settlements, the inclusion of a site in a non-principal settlement is in line with the approach taken in every other HMA and will help increase variety and choice across the HMA.

No modification is proposed to the Plan.

Strathmore HMA

Gavin & Carmen Tripney (0029/01/001); Brian Rickwood (0035/01/001); J&J Atherton (0088/01/002 & 0088/02/002); Alison Bowman (0129/01/001 & 0129/02/001); Martin Smith (0146/01/002); George & Susan Allan (0249/01/002); Alan Palmer (0274/01/001); Peter & Patricia Murphy (0323/01/002); Tom & Lucy Boylan (0398/01/002); JB Scott (0521/01/001); Ross Millar (0708/01/002): In line with TAYplan Policy 1 (CD022, page 8) most growth in the Strathmore area is directed to Blairgowrie / Rattray, which together are a tier 2 settlement, with smaller allocations to the tier 3 settlements of Alyth and Coupar Angus. TAYplan Policy 1 defines tier 2 as those settlements which have the potential to make a major contribution to the regional economy. Tier 3 settlements have the potential to play an important but more modest role in the regional economy. As such tier 3 settlements are to accommodate a small share of additional development.

As the largest town in the Council area, Blairgowrie / Rattray are considered to have the capacity to accommodate the largest share of the housing land requirement for the Strathmore HMA. Blairgowrie / Rattray is a local and visitor service centre which plays a significant role in the Strathmore and the Glens economy. Additional employment land is also allocated to help support the growth of the town.

Alyth / New Alyth and Coupar Angus are of a similar size. They are both significantly smaller than Blairgowrie / Rattray. The potential for further growth of Coupar Angus is restricted by flood risk and archaeological constraints. The Alyth Burn poses a flood risk to nearby properties in Alyth but there are parts of the town which can be developed. Three of the four allocations in Alyth / New Alyth have been carried forward from the adopted Plan and it is considered appropriate to direct a small amount of additional growth to Alyth. Taking an average capacity for each site, the housing allocations identified in the Proposed LDP in Blairgowrie / Rattray have the capacity to accommodate nearly four times as many houses as the allocations in Alyth / New Alyth.

In the Strathmore HMA the most growth is directed to the tier 2 settlement of Blairgowrie / Rattray where local services, employment and transport are concentrated. A smaller proportion of the growth is directed to the tier 3 settlement of Alyth / New Alyth which is one of the largest settlements in the Strathmore Area, outside Blairgowrie. The previous Examination Reporter concluded that '...all other things being equal, the former [Blairgowrie / Rattray] is to be preferred to the latter [Alyth and Coupar Angus] when it comes to allocating sites to meet the housing land requirement' (CD015, page 335, paragraph 12). The Council considers that this distribution of the housing land supply to meet the housing land requirement in the Strathmore and the Glens HMA is appropriate.

No modification is proposed to the Plan.

Other comments

The Scottish Government raise a number of technical issues in their representation.

Scottish Government (0451/01/001): The 'Effective Housing Land Supply 2016-28' in Table 1 of the Proposed Plan (page 17) is the same as that in the equivalent column in Table 7 of the Housing Background Paper (CD018) – 11,431. The figure of 12,195 quoted by the respondent appears to be the 'Effective Land Supply 2016-28' figure in Table 7 added to the 'Additional allocations to meet shortfall' figure. Table 1 in the Proposed LDP identifies the shortfall and surpluses in each HMA before additional allocations have been made in the Proposed LDP. Table 7 in the Housing Background Paper sets out the additional allocations which have been made in the Proposed LDP to give a final land supply position.

Scottish Government (0451/01/003): The comments regarding the small arithmetical issues in Table 7 of the Housing Background Paper (CD018) are noted. In the Highland HMA no additional allocations have been made for the reasons set out in the Paper hence the '0' in the 'additional allocations to meet shortfall' column – there is no arithmetical mistake. The remaining figures have been checked and are correct.

No modification is proposed to the Plan. However if the Reporter considered it would make the Plan clearer, the Council would not object to replacing Table 1 in the Proposed LDP with Table 7 from the Housing Background Paper.

Gladman Developments Ltd (0577/01/002): In line with SPP (CD004, paragraph 116), the housing land requirement set out in the Proposed LDP is the housing supply target identified in TAYplan, increased by an average margin of 18%. The LDP is required to identify sites to meet the housing land requirement and this is therefore the appropriate figure to include within the Proposed LDP. It is considered that the inclusion of the housing supply target figure is unnecessary and is likely to cause confusion.

No modification is proposed to the Plan.

Scottish Government (0451/01/002): The Reporter at the Examination of TAYplan 2 noted that the most straightforward approach to determining the tenure split between market and affordable housing is to apply '...the nationally supported affordable housing ratio to the assessed level of market housing demand, and making some allowance for additional affordable housing provision through other mechanisms' (CD059, page 224, paragraph 27) The Reporter goes on to note, however, that '...the net additional number of affordable homes that may be expected to be built over and above the 25% contribution from market sites cannot be quantified at this stage but is likely to be relatively modest' (CD059, page 224, paragraph 28).

The TAYplan2 Examination Reporter sets out the average annual market housing requirement (from the Housing Needs and Demand Assessment) and then adds to this an additional 25% affordable housing allowance which then gives the Housing Supply Target for each of the HMAs in Perth & Kinross (CD059, page 225, table at paragraph 34). The Reporter goes on to say that 'This level of generosity margin [of 18%]...would also allow for the development of some additional affordable housing beyond that secured via the 25% quota policy within market housing sites, while still maintaining some overall flexibility in the supply' (CD059, page 226, paragraph 35). The delivery of affordable housing is programmed and monitored through the Strategic Housing Investment Programme rather than the LDP. It is precisely in order to retain some flexibility between market and affordable housing that the tenure split was not specifically set out in Proposed LDP2.

No modification is proposed to the Plan. However if the Reporter is minded to accept the modification the Council would not object to including the following after Table 1:

Table 1a – Tenure Split

Housing Market Area	Adjusted Housing Land Requirement 2016-2028	Indicative Market / Affordable split 2016-2028	
		Indicative Market Housing Land Requirement	Indicative Affordable Housing Land Requirement
Greater Perth	5,933	4,450	1,483
Highland	765	574	191
Kinross	806	605	201
Strathearn	1,534	1,151	383
Strathmore	1,544	1,158	386
Greater Dundee	72	54	18
PKC Total	10,654	7,992	2,662

Note – The market / affordable split figures are indicative only and are based on the assumption that 25% of all sites will be affordable housing in line with Policy 20.

Reporter's conclusions:

Reporter's recommendations: