

Issue 25	Perth Strategic Development Area	
Development plan reference:	MU70 Perth West p266-268 MU73 Almond Valley p262-263 MU345 Bertha Park p261 MU168 North of Bertha Park p272	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Janet and Stephen Carratt (0027) Lynne Palmer (0040) Tayside & Central Scotland Transport Partnership (TACTRAN) (0057) Stephen and Victoria Watkins (0108) Derek Orr (0141) The Bield at Blackruthven (0148) Miss Mary Christie (0268) Perth and Kinross Heritage Trust (0272) Drs Gordon and Helen Allot (0273) Ramblers Scotland (0322) Scottish National Heritage (SNH) (0353) Flora M Douglas (0381) Mr Thomas Guthrie (0396) Alistair Godfrey (0410) 1st Marquis of Montrose Society (0413) Springfield Properties PLC (0455)</div> <div>Woodland Trust Scotland (0462) Barratt North Homes (0513) Mrs Freda Robb (0520) Hermiston Securities (0530) The John Dewar Lamberkine Trust (0532/01, 0532/02, 0532/03, 0532/04) M&SM Bullough & A Ritchie & Son (0542) Historic Environment Scotland (0580) The Pilkington Trust (0608) James Ewan & Fraser Niven (0613) Bruce Burns (0663) Huntingtower Ruthvenfield Conservation Group (0666) May Smith (0667) Joyce and Mike Nairn (0671) Luncarty, Redgorton and Moneydie Community Council (0703) Scottish Environment Protection Agency (SEPA) (0742)</div>		
Provision of the development plan to which the issue relates:	Perth Strategic Development Area	
Planning authority's summary of the representation(s):		
<p><u>MU70 Perth West</u></p> <p>Hermiston Securities (0530/01/001) as a major landowner here supports this mixed use allocation and is committed to working with the other landowners, stakeholders and the Council in its delivery in the spirit of partnership established through the charrette. It is considered that there are more detailed requirements set out for this allocation than the others and that this is reflective of the considerable work to date.</p> <p>The John Dewar Lamberkine Trust (JDLT) (0532/04/001, and 0532/03/001, 0532/02/001, and 0532/01/003): The JDLT and Muir Group are the landowners for the southern element which covers 180 hectares (75% of allocation MU70) and this representation focuses upon this element of the allocation. However, the JDLT and Muir Group recognise the importance of strategic connections, particularly in relation to access, landscape and open space and social amenities (including education), with the northern element of the site and have a constructive working relationship with the promoters of that land, to ensure the</p>		

delivery of the wider allocation is consistent with the site specific developer requirements.

The Proposed LDP2 allocation culminates four years of collaborative work with a range of stakeholders to prepare a development framework. The JDLT co-sponsored the 2015 charrette with Scottish Government, Perth & Kinross Council and the Muir Group (adjoining landowner/developer), and are also progressing a district heat & power feasibility study through a joint commission with Zero Waste Scotland and Perth & Kinross Council. The JDLT are also advancing key elements of the project infrastructure through the Tay Cities Deal bid. This is in collaboration with neighbouring landowners, government agencies, Perth & Kinross Council and the local community.

This JDLT representation outlines alignment of the MU70 allocation with planning policy and the delivery approach. There are summarised details of how the site specific developer requirements covering accessibility, landscape and open space, cultural heritage and specific surveys, will be progressed through technical assessments and associated consultation to inform a masterplan and planning application. Supplemental information comprising a Development Study & Delivery Strategy (RD071), Transport Assessment (TA) (RD073), and Development/ Design and Access Statement (DAS) (RD072), accompany this submission as reference sources. It is noted that site specific developer requirements set a broader development range of circa 2,400-3,700 homes and 25 hectares of commercial land. Consistent with the processes and assessments required by the site specific developer requirements and proposed policy 23 (Delivery Strategies), it is submitted that the exact scale of development will be determined within this range. For the purposes of the assessments, the JDLT have worked on a medium site density of 3,000 homes and 20 hectares of development, with the transport analysis building in capacity to circa 3,200 homes and 25 hectares development.

Extending the settlement boundary within the adopted LDP up to West Lamberkin Wood as shown in Figures 2a and 2b within MU70 Reasons for Supporting the Plan (RD070), emerged through the charrette process of 2015 as a response to the poorly defined existing boundary and the opportunity, consistent with the Scottish Planning Policy paragraphs 48–51 (CD004, p15). To draw a long term, defensible settlement edge that works with established landscape features (i.e. forestry) and can support the planned growth of the city, protect the wider countryside and enhance public access.

The JDLT consider that the LDP2 site specific developer requirements for allocation MU70 captures the challenges and opportunities and have been informed through technical assessments detailed in the Strategic Environmental Assessment (SEA) (CD075, p231-250), with further supporting information provided in section 3 within MU70 Reasons for Supporting the Plan (RD070). The accompanying reference sources provide further technical details on the site and analysis to inform a development framework.

A Landscape and Visual Impact Assessment was commissioned to assist consideration of the effects of developing Perth's landscape and is significant for both the landscape as an environmental resource and on the wider communities' views and amenities. In terms of accommodating the strategic development, the conclusions of the assessment are that certain zones would be deemed unsuitable for building as the effect of development could not be fully mitigated by landscape proposals. Also West Lamberkin Wood has been identified as a strategic outer boundary of Perth to provide a robust and defensive boundary and reads as a logical landscape and visual edge to the City.

M&SM Bullough & A Ritchie & Son (0542/01/001): As landowners of the existing LDP H70

they support the continuation of this site as part of a wider mixed use allocation, in line with the Strategic Development Framework following on from the Charrette and the LDP MIR. They are engaging with landowners to the South and consider that respective masterplans can demonstrate vehicle, pedestrian and green network connectivity. Considers that the Pause and Review lacks clarity and introduces uncertainty, but is anticipated to be a TA update to consider performance of the measures in place. Otherwise they acknowledge requirements and where possible they can be delivered taking account of viability and other considerations.

TACTRAN (0057/01/026): Supports inclusion of enlarged allocation and supports the aims and contents of the Site Specific Developer Requirements and considers that this would have implications for TACTRAN Regional Transport Strategy 2015-2036, STPR Project 16 and RTS Project SC6.2 (CD054, p11).

Janet and Stephen Carratt (0027/01/001), The Bield at Blackruthven (0148/01/001), Mary Christie (0268/01/002) Flora M Douglas (0381/01/001), Freda Robb (0520/01/001 + 002) Huntingtower Ruthvenfield Conservation Group (0666/01/003), May Smith (0667/01/003), Joyce and Mike Nairn (0671/01/002): Comments from the public about MU70 mention some or all of the following reasons for concerns/objections:

- the need for this new proposal in terms of housing land supply (and Brexit effect on immigration numbers)
- better new housing areas being available within the town
- that there are limited employment opportunities/whether there is capacity for further commercial development/ impact on commuting patterns
- ability of new infrastructure (education, health care, emergency services, roads infrastructure) to cope and then maintenance of new infrastructure/that infrastructure should be delivered before development
- impact on existing surface water flood issues (including A85 flooding)
- impact of filling the quarry
- loss of greenspace/ habitat value/ impact on amenity for recreation
- loss of agricultural/prime agricultural land and that this is not necessary in planning policy terms (agricultural tenant of West and East Lamberkine Farm seeks removal of this site, or that it be limited to the H70 in the adopted LDP as they wish to continue farming this land with the prospect of passing it on to the next generation)
- impact on road networks/traffic congestion, and air/light/noise pollution
- impact on historical/archaeological features
- that since Bertha Park has commenced building, development should be completed there before MU73 and MU70 are allowed - to limit residents within building sites (citing Oudenarde)
- the need to retain and not overwhelm the integrity of East and West Huntingtower

Specific points about the history of this site through LDP1 and LDP2 preparation are made as follows:

- the LDP1 Examination Reporter criticised the Council for bringing forward this proposal without having resolved technical issues such as access (considers this still not been done and that the charrette only established how access could be undertaken rather than why or how technical and environmental problems could be overcome)
- refers to LDP1 Reporter conclusions “the proposed extension would represent a very significant extension and (from the information which is submitted to date) harmful (in landscape and visual terms) expansion of the built up area into

landscape setting, that unlike H70 of the Proposed Plan, is distinct from the urban form of the city. Any public benefits that have been identified... would not overcome the issues outlined above, which indicate strongly against modifying the Plan in the manner that has been requested.” This was against a smaller site than the one currently proposed which would have greater impacts on the landscape, requires moving the Green Belt boundary, and will be more removed from the urban form of Perth. It is considered that LDP2 MU70 goes against the Reporters conclusions.

- the 2015 MIR makes it clear that the Green Belt boundary change being promoted is being promoted because of the new junction rather than because a development site of this size is needed
- to support this proposal goes against the Reporter’s consideration of Perth West through LDP1 Examination and this proposal is a bigger one than considered then and one which involves changing the Green Belt boundary

Freda Robb (0520/01/001 + 002) Janet and Stephen Carratt (0027/01/002) object to moving the Green Belt and mention some or all of the following as reasons:

- the Green Belt is for the longer term and was only established in 2014
- the Reporter established the current LDP boundary as being the right one
- this Green Belt boundary is supposed to give long term confidence to communities
- the long term consequences of eroding the Green Belt boundary so soon for no overriding reason
- loss of Green Belt land is not considered to be compensated by provision of public open spaces
- although the Reporter of LDP1 acknowledged that the western boundary was less distinct it was also considered that the lack of a more identifiable feature was “outweighed by the loss to development of an important element to the city’s landscape setting and by the inappropriate location of that development in terms of its landscape impact and poor connectivity to the city”
- question why a small area to the south of the A9 is proposed to be excluded from the boundary even though the policy allows for essential infrastructure.

Janet and Stephen Carratt (0027/01/001): Object to development of field along B road from West Huntingtower to Crieff. Reasons given for these objections are that:

- planning permission has been refused here due to inadequate access onto the B road. This B road access and junction with the A85 is considered dangerous, is an accident spot, and serves Kings and Agricar business’s with their heavy vehicle movements,
- the B road is also considered unsuitable for construction access
- that the archaeological interests here make it unsuitable for development.

The Bield at Blackruthven (0148/01/001): Landowner to the west of the MU70 allocation raises the following concerns:

- need for green spaces/fences bordering their Blackruthven Farm houses ‘The Southton Smallholding’ which are used for working outdoors with vulnerable adults and to shelter proposed housing from farm working
- over the potential for Blackruthven Farm to be developed in the future and seeks Green Belt revision to the adopted LDP boundary
- seeks biomass district heating systems in line with ‘A Low Carbon Place’ for new development
- seeks an east west phasing
- and comments on desirable layout

Barratt North Homes (0513/01/001): Seeks their Huntingtower site granted in principle planning permission to be included as a separate allocation. Barratt North Scotland are in control of the Huntingtower site and will be submitting a Matters Specified in Conditions (MSC) application in early 2018. Considers that being within MU70 does not recognise its planning status or its capability of being delivered independently. The masterplan and indicative layout which formed part of this submission show vehicular and pedestrian connections from Huntingtower to the currently allocated Perth West site and to the core path network abutting the western and southern boundaries of the site.

The Pilkington Trust (0608/01/001): Wish to object to the proposed expansion of the Perth West allocation and request that it is identified as an area of potential supply in the longer term should criteria be met as set out. There is no housing land requirement for this site. Several large sites have started bringing forward first phases of development. If too many sites are opened up resources for public infrastructure are stretched, there is potential flooding of the market, land prices are driven down to a level where land will no longer be released and there is risk of planning blight where developments stall. It is essential that developments which contribute to the Perth Transport Futures infrastructure including the Cross Tay Link Road (construction, junctions, and developer obligations) are prioritised. Spreading resources thinly risks compromising the facilities agreed for Almond Valley and Bertha Park Masterplans. To include an expanded Perth West site, without controls, could destabilise the recovery of small sites and set back the early progress of major investment sites. They also consider that there is no clear justification for the pause and review trigger being at 1,500 homes. If Perth West is a safety margin and overprovision (referring to the housing background paper) it should be controlled and curtailed by policy, examples of this kind of approach exist (Moray and Borders Council).

James Ewan & Fraser Niven (0613/01/2): Seeks amendment to show scheduled monument 'Mains of Huntingtower, henge, enclosures, pits and road WSW of' in the Parish of Tibbermore & County of Perth which is a scheduled monument area under the Ancient Monuments & Archaeological Areas Act 1979 (Index No. 3630) (CD024) and its wider setting clearly marked as there is no regard for location and its setting.

1st Marquis of Montrose Society (0413/01/001): Are concerned about potential threat posed to integrity of the battlefield. The battlefield of Tippermuir was the first of the Scottish Civil War (1644-45) and the first of the First Marquis of Montrose's Annus Mirabilis in which he won 6 victories in less than 1 year finally defeating the last Covenant army in Scotland at the Battle of Kilsyth on 14th August 1645. Seeks constructive approach to balancing battlefield preservation with sustainable development and gives comments to shape and inform the battlefield conservation plan required under the site specific development requirements and Policy 30. Considers it vital that a Battlefield Conservation plan is prepared as a precursor to any masterplan. Comments are given to inform the scope of this, and future engagement with the society is sought in its preparation. Considers that the battlefield area before commencement must have been a large area of 400 metres by 1,400 metres. Considers these dimensions must be taken account when considering the preservation of this battlefield initial deployment. Further historical and archaeological work must be conducted to examine the possible deployment options and confirm the extent of the battlefield to be preserved.

To date it is considered that there is no evidence of any archaeological research being done specifically to located and define the battlefield. Metal detector search may reveal the fall of musket shot and where weapons and armour may have been dropped and lost.

Some permissions have been obtained but the costs are too great for a small society with limited funds. Considers that once the battlefield is defined it should be interpreted at various places to better communicate the battlefield and the context of the battle in our history.

Historic Environment Scotland (0580/01/006 + 008): Considers this proposal has potential to impact on the Inventory Battlefield of Tippermuir. The settlement boundary has been expanded and it is likely to have an adverse effect on the battlefield which will require mitigation. Suggests that the conservation plan for the battlefield should influence development in this area.

SNH (0353/04/001): Following the completion of the Habitats Regulations Assessment (HRA) SNH have updated their holding representation to now recommend amendments to the Proposed Plan in line with the outcomes of the HRA and Appropriate Assessment. Site specific developer requirements regarding Construction Method Statement, other surveys and species protection plan are not relevant for this site. It was screened out under HRA for the need for further assessment i.e. no mitigation for River Tay SAC required Table 5.17 (CD056, p 80-81).

SNH (0353/01/022): Support the active travel links described in bullet 2 (page 264) but for clarity these should be segregated cycle/paths as part of the green network for the masterplan area.

SNH (0353/01/022 + 0353/03/001): SNH disagree with the Council's comments on LDP1 Policies' for this access that "The proposal for some loss of Ancient Woodland at Perth West is not considered to lead to fragmentation or disconnection" and that it will achieve significant net public benefit in accordance with Scottish Government's Policy on Control of Woodland Removal (CD007).

SNH refer to Forestry Commission Scotland guidance which also states: "Conservation of ancient semi-natural woodland and restoration of the biodiversity of planted woods on ancient woodland sites are priorities in the Scottish Forestry Strategy (CD115) and Scottish Biodiversity Strategy (CD127), and both have adopted UK Biodiversity Action Plan (UKBAP) targets for restoring PAWS to native woodland." The map currently shows woodland as mostly outwith the site boundary but this is an integral part of the development masterplan to provide habitat connectivity from north to south.

The map shows an "access point" at Lamberkine woodland to the south of the masterplan. This is listed in the Ancient Woodland Inventory (AWI) (LEPO). The masterplan should avoid unavoidable loss or fragmentation of this woodland in accordance with Scottish Government's Control of Woodland Removal Policy (CD007). SNH also recommend a detailed woodland survey at this early stage at the appropriate time of year and by a suitably qualified consultant who has experience of woodland habitat surveys and include:

- An NVC survey and map with site community floristic descriptions, target notes and locally important site features
- An assessment of the role and importance of the wood's connectivity to the wider woodland network.

Woodland Trust Scotland (0462/01/008): Supports the requirement for long-term woodland management with focus on native woodland and would like to know how the Council will plan to enforce this and suggests the Council liaises with SNH. Seeks site

specific development requirements stipulating native planting and considers that ancient woodland should be protected from development as new planting is not the solution and should be replaced by a requirement to maintain the woodland intact and protect it through a buffer area or native tree screen planting. Seeks that if routes are to be provided they should be designed to minimise disturbance and use sustainable material.

MU70 Cemetery search area

SNH (0353/01/023): Support the search area within Perth West MU70: The successful integration of a well-designed cemetery into the MU70 proposed allocation could be a positive contribution to the townscape and its green infrastructure and appropriate recreational use of the cemetery.

SNH do not recommend the search area in West Lamberkine Wood as this lies in an Ancient Woodland Inventory site (AWI - long established plantation origin). In addition, the woodland forms part of the rural landscape outside the new settlement and provides robust landscape containment of the urban extension towards the open fields. The introduction of urban development such as the cemetery and associated infrastructure would significantly reduce and degrade this robust containment, creating an urban spill-over into the rural woodland.

Woodland Trust Scotland (0462/01/006): Generally seeks greater protection of ancient woodland in the Perth Area. Retaining and enhancing woodland area is considered vital to better air quality particularly given concerns around air quality. Considers that the Lamberkine Wood is not an appropriate site for a cemetery as it is LEPO ancient woodland and development of this kind is inappropriate here.

Mary Christie (0268/01/002): Considers Lamberkine woodland is not a suitable site for a cemetery.

Lynne Palmer (0040/01/005): Supports idea of a woodland cemetery but concerned about compatibility with proposed increased leisure use of the Lamberkine woodland

The John Dewar Lamberkine Trust (0532/01/003): The potential to accommodate a cemetery within West Lamberkin Wood for Perth exists and is being assessed as part of the pre planning work streams. Key considerations are alignment with the Scottish Government's policy on the control of woodland and this will be progressed in consultation with Scottish Natural heritage (SNH), and LDP2 Proposed Plan policies 36-38 on landscape, forestry and biodiversity (CD052, p63-65).

SEPA (0742/01/090): Seek a developer requirement be attached to this site requiring intrusive ground investigation is undertaken in line with Guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32) (RD023) before any development occurs at the site.

Cemeteries can have a detrimental impact on groundwater. Their acceptability, including the potential location and scale of development at a site, can be assessed only following intrusive ground investigation. In the absence of such information, we reserve our position on the acceptability of these proposals.

A development requirement should be attached to these proposals requiring intrusive ground investigation is undertaken in line with our Guidance on assessing the impacts of

cemeteries on groundwater (LUPS GU32) before any development occurs at the site. It should be highlighted that the findings of the investigation may indicate that the site is not suitable for a cemetery due to an unavoidable impact on groundwater.

The protection of groundwater accords with the objectives of the Water Framework Directive and your associated duties as a responsible authority under the Water and Environment and Water Services (Scotland) Act 2003(CD038). These duties are reflected in paragraph 194 of Scottish Planning Policy (CD004, p45) which states that the planning system should promote the protection and improvement of the water environment, including rivers, lochs, estuaries, wetlands, coastal waters and groundwater, in a sustainable and co-ordinated way.

MU73 Almond Valley

Stephen and Victoria Watkins (0108/01/002), Derek Orr (0141/01/001), Drs Gordon and Helen Allot (0273/01/001) Thomas Guthrie (0396/01/001), Huntingtower Ruthvenfield Conservation Group (0666/01/001 + 003) May Smith (0667/01/001 + 002,+ 003) Joyce and Mike Nairn (0671/01/002 + 003): Comments about MU73 mention some or all of the following reasons for concerns/objections:

- better opportunities elsewhere in Perth/other sites at Perth West should be developed first/that since Bertha Park has commenced, development should be completed there before MU73 and MU70 are allowed - to limit residents within building sites (Oudenarde)
- wishes of the community to keep this site undeveloped
- Brexit should be taken into account
- historical estimates of housing requirement consistently over estimated
- insufficient employment opportunities
- poor drainage issue
- flood risk issues remaining despite flood defences
- impact on river valley/ ancient forest habitat/ wildlife/ potential green corridor west of Perth/ historic setting of the Perth Town Lade and Huntingtower castle/ uniqueness of the location
- need to preserve and enhance the natural beauty (River Almond, woodlands to south, and Lade through middle)/ that some boundary trees with MU345 have been lost and these should be maintained and replaced.
- retain semi-rural amenity
- retain not overwhelm integrity of East and West Huntingtower
- retain residential privacy level for Logie Mill property
- impact on traffic volumes locally and in city centre/ that infrastructure should be delivered before development
- impact on health services
- light, noise, traffic and air pollution
- impact of the gas line that runs through the site
- that the conditions on the planning permission should be strictly enforced

Perth and Kinross Heritage Trust (0272/01/11): Mentions that's this allocation may have archaeological potential and suggests that the site specific requirements for this allocation should be updated to reflect the likelihood of this requiring investigation.

SEPA (0742/01/087): Please refer to the common SEPA position set out in under the sub heading 'Land allocations defended by appropriate flood protection schemes' in the Policy

50 New Development and Flooding Schedule 4.

MU168 North of Bertha Park

Springfield Properties PLC (0455/1/6): Supports this allocation considering its location in association with the CTRLR as ideal for those from the large hinterland and Bertha Park to connect to the city centre and represents a logical extension to Bertha Park MU345. The location of the park and ride within the Bertha Park Masterplan (planning permission in principle) would be amended creating an additional housing/employment opportunity but given the MU345 allocation is defined as 3,000+ this would not require an adjustment.

John Andrews (0322/01/002), Alistair Godfrey (0410/01/019) + (0410/02/001), Bruce Burns (0663/01/002 + 006), and Luncarty, Redgorton and Moneydie Community Council (0703/01/003 + 004) object to this allocation and between them they raise the following points:

- At MIR stage Perth 6 was not consulted on and the reason stated was that “The planning application for Bertha Park indicates that employment land and park and ride can be accommodated within H7 Bertha Park.”
- Bertha Park planning permission in principle is now in place (15/01112/IPM) 11 months after the park and ride consultant’s report.
- MU168 would take development beyond the containment and south of the woodland
- Concern about the lack of restriction on uses (cites Broxden, hotel, garage, restaurant uses).
- Concerned about the cumulative impact (of Luncarty South, CTRLR, realignment of the A9, and the park and ride and adjoining employment land) on the corridor of land through which pass the River Tay, the railway and the A9 between Luncarty and the River Almond
- Impact of these proposals on the character and amenity and on the natural and built environment in terms of the placemaking policy is unacceptable, only essential development associated to the CTRLR and the re-aligned A9 should be allowed here
- Impact on recreational path users - due to confined nature surrounding Luncarty it is only to the south where routes can be found.
- There is a significant amount of hard infrastructure proposed
- Considers that 5 hectares of Park and Ride would be out of scale citing that Broxden Park and Ride is smaller (1.9 hectares).
- Part of the allocation lies within the existing Green Belt.
- SPP examples of permitted development within the Green Belt do not include infrastructure and feels this proposal is inconsistent with TAYplan Policy 1D (CD022, p8), and LDP Green Belt policy (CD014, p43-44).
- This site does not require a Green Belt location
- That the proposal has detrimental impact on landscape, views from core paths and views from hill summits (RD069)
- Concern about impact on Battleby Garden and Designed Landscape with reference to the designed landscape of Bertha Park by Thomas Graham and his Perthshire Estates (Huxley, T 2012) and to Study of the Woods and Wetlands at Bertha Park, Redgorton, Perthshire and the vision of Thomas Graham, General Lord Lynedoch (Godfrey, A. 2018) (RD068) That the proposal has cumulative impact on 4 sites of interest identified by Historic Environment Scotland
- There is unacceptable environmental impacts from traffic, pollution, noise and dust

and light and cumulatively in the area

- It would impact on the Bertha Park woods amenity, access, and biodiversity and would be contrary to land reform legislation and policy 39: biodiversity.

MU345 Bertha Park

Woodland Trust Scotland (0462/01/006+007): Generally seeks greater protection of ancient woodland in the Perth Area. Retaining and enhancing woodland area is considered vital to better air quality particularly given concerns around air quality. This site has LEPO ancient woodland along the northern and southern edges and this area should be buffered with native tree planting. Welcomes the requirement to retain and enhance the existing native woodland strips and seeks no fragmentation of habitats as new planting does not solve this.

Huntingtower Ruthvenfield Conservation Group (0666/01/002), May Smith (0667/01/002): Mentions the loss of trees as part of the Almond Flood scheme and road into Bertha Park. Considers that trees on the southern boundary of Bertha Park should be kept and enhanced to protect Almond Valley.

SNH (0353/04/001): Following the completion of the Habitats Regulations Assessment (HRA) SNH have updated their holding representation to now recommend amendments to the Proposed Plan in line with the outcomes of the HRA and Appropriate Assessment. The Site Specific Developer Requirements should reflect the outcome of the Habitats Regulations Appraisal (Table 8.1) (CD056, p156-157).

Modifications sought by those submitting representations:

MU70 Perth West

The John Dewar Lamberkine Trust (0532/04/001, and 0532/03/001, and 0532/01/003): M&SM Bullough & A Ritchie & Son (0542/01/001), Hermiston Securities (0530/01/001): No specific change sought and supports the allocation.

TACTRAN (0057/01/026): Supports allocation and site specific developer requirements

Janet and Stephen Carratt (0027/01/001): Objects to the allocation specifically the field along B road from West Huntingtower to Crieff.

Mary Christie (0268/01/002) No specific change sought. Seeks protection of existing path network, the woodland, and tree lines and considers new paths and greenspace should be provided with suitable setback distance to allow new trees to mature, along with integrated greenspace within developed areas with permeable surfaces and minimum soil sealing.

Flora M Douglas (0381/01/001): Seeks deletion of the allocation.

Huntingtower Ruthvenfield Conservation Group (0666/01/003), May Smith (0667/01/002), Joyce and Mike Nairn (0671/01/002): No specific change sought but seeks completion of Bertha Park before MU70 is allowed.

Freda Robb (0520/01/001 + 002) Agricultural tenant of West and East Lamberkine Farm seeks removal of this allocation, or that it be limited to the H70 in the adopted LDP.

Freda Robb (0520/01/001 + 002), and Janet and Stephen Carratt (0027/01/002) object to amending the Green Belt.

James Ewan & Fraser Niven (0613/01/002) Seeks amendment to show scheduled monument 'Mains of Huntingtower, henge, enclosures, pits and road WSW of' in the Parish of Tibbermore & County of Perth which is a scheduled monument area under the Ancient Monuments & Archaeological Areas Act 1979 (Index No. 3630) and its wider setting clearly marked.

The Bield at Blackruthven (0148/01/001): Seeks: Green Belt revision to the adopted LDP boundary so that parts of Blackruthven Farm could be developed in the future. No other specific changes are sought but comments are made regarding phasing after Bertha Park, open space provision, district heating and layout.

SNH (0353/01/022 + 0353/03/001): Seeks to amend site specific developer requirements as follows:

i) Amend: Accessibility 2nd bullet: "Early provision and enhancement of both paths and cycling routes to form active travel linkages to existing settlements and to neighbouring core paths, in particular the: Sustrans Route 77 which runs along the River Almond and connects south through the Perth West site... Farm."

ii) Map page 268:

Amend map legend from "core routes" to "off road cycle and pedestrian routes."

The map shows an "access point" at Lamberkine woodland to the south of the masterplan. This is listed in the Ancient Woodland Inventory (AWI) (LEPO). After additional communication on this matter SNH seek the following additional developer requirement: A detailed woodland survey at the appropriate time of year should be carried out by a suitably qualified consultant who has experience of woodland habitat surveys and include:

- An NVC survey and map with site community floristic descriptions, target notes and locally important site features
- An assessment of the role and importance of the wood's connectivity to the wider woodland network.

and seek to augment the following proposed developer requirement to read as follows:

"Ensure that the infrastructure and access arrangements planned, including connection to the existing Tibbermore road is informed by the findings of the detailed woodland survey in order to Access into the site to limit and avoid loss or fragmentation of ancient woodland and avoid loss of ancient semi natural woodland at Lamberkine, and a requirement to compensate for loss by extending native planting to the north and south."

iii) Amend map to provide broader area of proposed new native woodland within the west boundary to meet the developer requirement in the Plan.

SNH (0353/04/001): Seeks the removal of site specific developer requirements regarding Construction Method Statement, other surveys and species protection plan as they are not relevant for this site.

Woodland Trust Scotland (0462/01/006): Supports the requirement for long-term woodland management with focus on native woodland. No specific change sought, but seeks site specific development requirements stipulating native planting, that the ancient

woodland is maintained intact and protected through a buffer area or native tree screen planting, and that if routes are to be provided they should be designed to minimise disturbance and use sustainable materials.

1st Marquis of Montrose Society (0413/01/001): No Specific change sought – but has some concern about potential threat posed to integrity of the battlefield. Supports site requirement that a Battlefield Conservation plan is prepared as a precursor to any masterplan. Seeks battlefield interpretation at various places.

Historic Environment Scotland (0580/01/006): No specific change sought

Barratt North Homes (0513/01/001): Seeks their Huntingtower site granted in principle planning permission to be included as a separate allocation.

The Pilkington Trust (0608/01/001): Objects to the proposed expanded Perth West allocation and requests that it is identified as an area of potential supply in the longer term should criteria be met as follows

- (a) that a shortage of housing land has been identified through the annual review of the Housing Land Audit;
- (b) that no windfall, or constrained sites within Greater Perth area can be brought forward to meet the shortfall;
- (c) that if all or part of the long-term designated area is so identified for being brought forward as effective land, it is presented for consultation with the stakeholders (including Homes for Scotland) for incorporation into the following year's HLA; and
- (d) that where the above criteria are met, the selected area to be brought forward must be in the context of the Master Plan for the whole of Perth West, and the Master Plan approved as Supplementary Guidance for the LDP2.

MU70 Cemetery search area

SNH (0353/01/023) SNH support the alternative search area lying within Perth West MU70 AND do not support the search area which lies to the west of MU70 in Lamberkine Wood (Perth West).

Mary Christie (0268/01/002): Objects to Lamberkine woodland as a cemetery site. Seeks protection of existing path network, the woodland, and tree lines.

Lynne Palmer (0040/01/005): No specific change sought.

The John Dewar Lamberkine Trust (0532/01/003): No specific change sought and supports the allocation (as assumed).

Woodland Trust Scotland (0462/01/006): Considers that the Lamberkine Wood is not an appropriate site for a cemetery.

SEPA (0742/01/090): Seeks a development requirement requiring intrusive ground investigation is undertaken in line with our Guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32) before any development occurs at the site. It should be highlighted that the findings of the investigation may indicate that the site is not suitable for a cemetery due to an unavoidable impact on groundwater.

MU73 Almond Valley

Stephen and Victoria Watkins (0108/01/002): Objects to the area opposite H319 being included within this allocation

Drs Gordon and Helen Allot (0273/1) Thomas Guthrie (0396/01/001) Seeks deletion of the allocation.

Huntingtower Ruthvenfield Conservation Group (0666/01/003), May Smith (0667/01/001 + 003) Joyce and Mike Nairn (0671/01/002): No specific change sought but seeks completion of Bertha Park before MU73 is allowed.

Derek Orr (0141/01/001): No specific change sought

Perth and Kinross Heritage Trust (0272/01/11): Seeks a site specific requirement to reflect the likelihood of requiring archaeological investigation.

SEPA (0742/01/087): Please refer to the SEPA position as set out in under the sub heading 'Land allocations defended by appropriate flood defence schemes' in the Policy 50 New Development and Flooding Schedule 4.

MU168 North of Bertha Park

John Andrews (0322/01/002): Alistair Godfrey (0410/01/019), Bruce Burns (0663/01/006) Luncarty, Redgorton and Moneydie Community Council (0703/01/003+4): Seeks deletion of the allocation and Alistair Godfrey (0410/01/019) + (0410/02/001), Bruce Burns (0663/01/006) seeks its containment south of the woodland within MU345 whilst Luncarty, Redgorton and Moneydie Community Council (0703/01/003+4) and John Andrews (0322/01/002): seeks it relocation closer to Inveralmond

Springfield Properties PLC (0455/01/006): Supports this allocation

MU345 Bertha Park

Woodland Trust Scotland (0462/01/007): No specific change sought but seeks stricter developer requirements mentioning that LEPO ancient woodland along the northern and southern edges should be buffered with native tree planting, and that there should be no fragmentation of habitats.

Huntingtower Ruthvenfield Conservation Group (0666/01/002), May Smith (0667/01/002): No specific change sought but considers that trees on the southern boundary of Bertha Park should be kept and enhanced to protect Almond Valley.

SNH (0353/04/001): It is recommended that the following text is also added to the list of 'Site Specific Developer Requirements' (page 261) in the Proposed Plan:

- 'Proposals should not result in adverse effects, either individually or in combination, on the integrity of the River Tay SAC. Applications should be supported by sufficient information to allow the Council to conclude that there would be no such adverse effects.'

Summary of responses (including reasons) by planning authority:

MU70 Perth West

Hermiston Securities (0530/01/001), The John Dewar Lamberkine Trust (0532/04/001, and 0532/03/001, and 0532/01/003), M&SM Bullough & A Ritchie & Son (0542/01/001), TACTRAN (0057/01/026), Janet and Stephen Carratt (0027/01/001+ 002), The Bield at Blackruthven (0148/01/001), Mary Christie (0268/01/002), Flora M Douglas (0381/01/001), Freda Robb (0520/01/001 + 002), Huntingtower Ruthvenfield Conservation Group (0666/01/003), May Smith (0667/01/003), Joyce and Mike Nairn (0671/01/002) ,The Pilkington Trust (0608/01/001):

Principle of allocating MU70

Whilst there is no outright housing land requirement to identify this extended Perth West MU70 allocation this housing market area is dominated by reliance on larger strategic sites and if one of more of these stalls there is a need for the flexibility MU70 would provide. In other circumstances if one or more smaller housing allocations do not deliver as expected then the flexibility and choice of the many other housing allocations will ensure a sufficient housing land supply is maintained until the next review of the LDP, but a reliance on larger strategic sites requires greater flexibility in numbers. Pilkington Trust's suggestion that the wider Perth West should be identified as an area of potential supply in the longer term is resisted as this does not give the level of certainty required for investment in infrastructure and services and it limits competition. The planning system is not concerned with protecting land values. Even large sites can only deliver a certain number of units per year towards the effective housing land supply. MU70 will not set back delivery of the other sites or compromise provision of the CTRLR or public facilities. Indeed developer contributions towards transport infrastructure apply to this site just as they do to the objector's site. In effect both contribute equally to the Cross Tay Link Road. It is not appropriate to constrain this allocation until Bertha Park's completion as this would constrain market competition and limit growth. Objections to Greater Perth housing land supply are considered in more detail in the Housing Land Strategy schedule 4.

The majority of MU70 is already white land within the settlement boundary and identified as H70 in the current LDP, (MD199). In light of this it is reasonable to expect that a planning application would be forthcoming even if this wider site is not allocated in LDP2. The Reporter for LDP1 stated (CD015, p323), 'the possibility that planning permission might be granted for the required access at some point within the plan period cannot be ruled out. Indeed, a proposal of application notice has now been submitted to the council. And as the proposed green belt boundary would not include Site H70, this might then permit development to take place on the land within the plan period via the submission of a planning application.' Identification of this wider allocation in LDP2 would allow the Council to guide any forthcoming proposal with site specific developer requirements. The current LDP H70 allocation at Perth West (CD052, p79) does not have the critical mass to create a sustainable community and the Proposed LDP2 extension would give a foundation for the substantial public and private investment required.

Significant work has been done to date on a possible wider Perth West site through the charrette and masterplanning process. A wider Perth West proposal was first tested through a charrette in Spring 2015. Part funded by developers, the Council and Scottish Government, it brought all stakeholders together – community, key agencies, landowners, and the Council. Through workshops and site visits, we worked towards an agreed way forward. The charrette work to prepare a Perth West masterplan framework (CD135)

supported consideration of this larger more sustainable site which would require an amendment to the Green Belt boundary. On the back of that collaborative charrette process, the wider Perth West was identified in the LDP2 Main Issues Report (MIR) (CD046, p21-22 and 42-45) as a preferred option. Prior to publication of the Proposed LDP2 further developer information was sought to clarify its effectiveness and was obtained through provision of a Perth West delivery strategy June 2017 (CD137) and Perth West access strategy June 2017 (CD136).

The Strategic Environment Assessment (SEA) for this site (CD075, p231-250) and habitats regulations appraisal (HRA) (CD056, p80) demonstrates that MU70 is suitable subject to appropriate site specific developer requirements. This proposal was assessed alongside other proposals submitted at the earlier plan preparation stages and is considered to be appropriate. 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 Council's brownfield audit (CD272) indicates that there are limited additional opportunities for redevelopment in Perth. There are some smaller sites but of the significant opportunities, Perth Quarry MU171, Murray Royal Hospital site MU336, the Hillside Hospital site MU337, and Newton Farm H71 are already identified as allocations in the Proposed LDP2, whilst the Tulloch marshalling yard which is currently identified for residential development in the existing LDP (CD014, p81) is not effective and is identified as existing transport infrastructure in the Proposed LDP2 to reflect Network Rail's plans for its reuse.

Although MU70 is a suitable location there are landscape and visual sensitivities to be addressed in the detailed masterplanning and design and layout. It is noted that the Reporter considered for that LDP1 proposal that (CD015, p361-363) 'Careful attention to design and landscaping could address the concerns that have been raised over landscape and visual impact.' The main issue raised by the LDP1 Reporter which prevented a wider Perth West sites inclusion at that point where to do with lack of consultation on the A9 access (with concern that its visual impact was not properly considered or consulted upon). Consultation on this A9 access and landscape and visual impacts was considered as part of the charrette (CD135) and then the LDP2 MIR consultation (CD046, p42-45). The site is generally well screened from the A9 north of Broxden but it is prominent from the A9 to the south. It is desirable to soften the western urban edge of Perth and create a new outer western edge which links shelterbelts and woodlands, and incorporates new tree planting, to provide a transition between town and country. This is proposed through one of the site specific developer requirements and indicatively shown on the site drawing. There are also other site specific developer requirements that seek to minimise landscape and visual impacts. There is a requirement for: a green corridor along the A9 to control outward views where appropriate; an urban design framework for the A85 corridor; and existing important treed/woodland areas are identified for protection as open space. This mitigation will ensure the acceptability of the proposal in terms of its landscape and visual impact.

There would be loss of farmland as most of MU70 lies within prime agricultural land (class 3.1) with areas outwith prime classifications (class 3.2) to the south west and north of the site. However suitable opportunities to extend Perth would necessarily impact on prime agricultural land. The allocation of mixed uses here is an essential component of the settlement strategy of the LDP and follows the Policy 3 TAYplan commitment (CD022, p18) for the West/North West Strategic Development Area to provide 4,000+ homes, 50 ha employment land and new roads. SPP says development should not be permitted on prime agricultural land but lists exceptions where it is essential, one of which is 'as a

component of the settlement strategy or necessary to meet an established need, for example for essential infrastructure, where no other suitable site is available'. The Reporter considering Perth West in Proposed LDP1 (CD052, p361-363) stated that 'inevitable loss of agricultural land would not be objectionable, given the acceptance in TAYplan that significant areas of such land must be released for development in west / north west Perth if forecast housing requirements are to be met.' To mitigate the impact on agricultural land there is a site specific developer requirement for good-quality soils to be removed for effective reuse, and the land which is being used would need to be used efficiently in line with the Placemaking policy.

No modification is proposed to the Plan.

The proposed extent of MU70

During the preparation of the Perth West Masterplan Framework (CD135) the A9 access point was discussed in a meeting with Transport Scotland on the 5th of August 2015. It was considered at that meeting that the proposed location of the junction is roughly where it needs to be. The notes of the meeting with Transport Scotland, 5 August 2015 (CD139, p1) state that, "Potential 1.5km spacing of the A9 interchange from the Broxden Roundabout slips is an estimate and will be confirmed at the future detailed transport assessment and modelling stage. The exact location is not yet confirmed but Transport Scotland advice suggests the indicative location shown (within the current LDP Green Belt) is in the right vicinity. SPP (CD004, p15) says Green Belt boundaries should be drawn with consideration to: 'establishing clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways, or main roads. Hedges and field enclosures will rarely provide a sufficiently robust boundary'. Currently the LDP1 Green Belt (CD014, p319) follows a thin field boundary tree belt. The proposed LDP2 Green Belt amendment would serve to make a more rigorous long term boundary associated to the West Lamberkine woodland block. This amendment would also include the proposed A9 access location which is otherwise likely to have a significant impact on the Green Belt. It is therefore logical for the West Lamberkine woodland to be the western boundary of the site and for the Green Belt to be moved to reflect this.

The Council should maybe have looked longer term when defining a Green Belt for the first time in LDP1 but with no history or experience concerning Green Belts some limited refinement of it has proven to be necessary through LDP2. However the SPP acknowledges that (CD004, p15), 'In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.' The Proposed LDP2 Green Belt boundary at Perth West would offer a robust and defensible position and a logical landscape and visual boundary to the city.

No modification is proposed to the Plan.

The Bield at Blackruthven (0148/01/001): The Bield at Blackruthven proposal for the LDP2 Green Belt boundary to be moved westwards at Blackruthven as per LDP1 is generally resisted. When reviewing the Green Belt in LDP2 it was considered that the current boundary does not follow SPP advice. The LDP1 Green Belt boundary north of Southton of Blackruthven follows a minor road and single tree line. The proposed LDP2 boundary follows a more defensible boundary following a (40-180m wide) woodland belt on the edge of MU70. There is however a stretch of the LDP2 Green Belt boundary between the Tibbermore Road and North of Parkneuk (within the Bield's ownership) which currently

follows a field boundary.

As it stands this is not a robust boundary but this boundary would be strengthened by planting requirements associated to MU70.

No modification is proposed to the Plan. However if the Reporter was minded to pull the boundary of the Green Belt westwards at this point (MD198) to follow the existing woodland at North Blackruthven then this would also be a robust boundary and the local authority would be comfortable with this modification however it would also have implications for Policy 41 Green Belt.

A small area to the south of the A9 is identified within the MU70 boundary acknowledging the role this land is likely to have in provision of the A9 junction. Whilst it could be left outwith and a proposal be considered under the Green Belt policy it seemed more transparent to include it within the site boundary as an integral part of the proposal.

No modification is proposed to the Plan.

Barratt North Homes (0513/01/001): The Council permitted an in principle planning application 16/01348/IPM (CD192) at the former auction mart site as it was in accordance with the current LDP. A detailed planning application (18/00412/AMM for an initial phase of 43 homes) (CD194) was approved on the 4th of July 2018. The 18/01038/AMM planning application (CD195) for the rest of the site (208 dwellinghouses, 30 flats, and 11 garages) was validated on the 28th of June 2018 and is currently under consideration. There is scope to bring forward this site in advance of wider masterplanning work for Perth West. However there would be advantage in bringing it forward as part of a wider Perth West masterplan should this planning permission lapse. Key linkages have been considered but closer integration of the former auction mart site with the wider Perth West site would better address placemaking objectives, and would be beneficial to developers, being a more equitable and cost effective way of integrating and providing for open space, active travel, education and other infrastructure costs. It should therefore be maintained within the wider Perth West MU70 allocation.

No modification is proposed to the Plan.

Janet and Stephen Carratt (0027/01/001): There is part of the Mains of Huntingtower scheduled ancient monument in the field immediately south of Kings and Agricar businesses (along B Tibbermore road from West Huntingtower to Crieff). This field is identified in the Perth West masterplan framework for formal or semi-formal greenspace. The fields west of West Huntingtower adjacent to the A85 land benefits from an in principle planning permission as part of the wider Almond Valley proposal 15/01157/IPM. The proposed layout shows a new roundabout on the A85 to the west of West Huntingtower (CD189) which then connects to the B Tibbermore road. This addresses the A85 road junction concerns as the Almond Valley proposal 15/01157/IPM has a condition which states that (CD188, p7): 'No more than 90 residential units are permitted to be occupied until the A9/A85 Junction Improvement, generally as proposed by Perth and Kinross Council as part of its 'Perth Transport Futures Project' transport strategy to support the Local Development Plan, is operational and until the following infrastructure has been delivered:

a) Provision has been made for pedestrian connections and public transport facilities in the form of footways, crossings and bus stops on and along the A85.

- b) The new roundabout on the A85 connecting to the site and the Tibbermore Road shall be constructed and operational
- c) The current junction of the A85 and Tibbermore Road shall be closed by the Council'

The other field south of the Tibbermore B road beyond the scheduled ancient monument at the eastern edge of MU70 is identified as a potential housing area in the Perth West Masterplan Framework and this can be considered further through the masterplanning and planning application process however the junction and access difficulties mentioned have been addressed in the 15/01157/IPM permission.

No modification is proposed to the Plan.

Infrastructure provision:

The Shaping Perth's Transport Futures project (CD009) was developed alongside LDP1 to give greater priority to bus and active travel, to help ensure we do not exacerbate air quality problems within the Air Quality Management Area, and to ensure there will be sufficient capacity in the transport network to accommodate the future developments identified in the LDP. It is an integrated package of measures incorporating the Cross Tay Link Road (CTLR) and is supported by a package of City Enhancements to improve the wider public transport, walking and cycling networks and "lock-in" the benefits of the CTLR. The project is based on the future traffic movements associated with the current LDP allocations and identifies the need for an integrated approach to address the transport problems. In terms of progress on Perth Transport Futures the Council is developing, costing and implementing the package of infrastructure works required to deliver the Local Development Plan Strategy. Further detail on its delivery is provided in the Perth Transport and Policy 4 schedule 4.

Recently, to consider the implications of a wider LDP2 Perth West, further traffic modelling work has been undertaken to assess the implications of the wider Perth West site (based on its Masterplan Framework and access strategy) and the other Proposed LDP2 allocations. When carrying out this update to the modelling the traffic solutions comprised: the CTLR, A9/A85 junction improvements, and Inveralmond and Broxden roundabout improvements as specified in the LDP2 traffic model report (CD216). If capacity improvements at the Inveralmond and Broxden roundabouts are included, then the modelling work indicates that the wider Perth West site could potentially cope with somewhere between 1,500 and 2,500 new houses before further physical/ modal measure may be required depending on the access arrangements and internal layout for the site. There may also be implications for the city centre operation as a whole. The Pilkington Trust suggests there is no clear justification for a pause and review at 1,500 homes but this modelling work is the justification. This was given in the Council's MIR Summary of Responses to Questions (CD141, p41-42) published alongside the Proposed LDP2.

The delivery of access arrangements and other improvements, along with how the site is split and phased could influence the threshold for this pause and review. To guide appropriate proposals (planning applications) there is a site specific developer requirement for the Transport Assessment, and modelling studies to inform preparation of a Comprehensive Transport Strategy. This pause and review threshold may be influenced at the planning application stage by this work but given the model results it should not be any later than either: 1,500 homes, or 20 hectares of employment land or by 2035 whichever comes first. This acknowledges the certainty the Council has over the initial phases of Perth West, and offers a suitable critical mass for sustainable communities and

for development viability. If there are transport/traffic challenges beyond communities of 1,500 homes these could potentially be addressed by further physical/modal measures including park and ride provision. There is uncertainty ahead, in 15-20 years changes in the use of cars, modal shift, and even autonomous vehicles means we cannot predict requirements and a later review will be more appropriate.

Proposals for development will be assessed with input from the Council's Transport Planning Team, and Environmental Health colleagues against the provisions of the plan. Detailed matters in relation to traffic implications and air quality would be suitably addressed through future planning application and masterplan/s for the site. As acknowledged by one of the developer requirements Transport Assessment(s) and future modelling studies will determine network and local junction capacity, when the strategic junctions will be required, and when the connection from the A9 to the A85 is required.

Supporting the sustainable development of new communities within the strategic development sites requires consideration to be given to the lifetime service needs of the residents. This includes education, community development, and support, health and social care. It is acknowledged that all the health care and other support needs of this population cannot be accommodated within the existing provision within Perth. In the spirit of Community Planning and in particular the Health and Social Care integration the Community Planning Partnership (CPP) support the provision of integrated hub facilities capable of meeting health, social care and other support needs of the communities. NHS Tayside requested land measuring 5,000 square meters within the two identified new housing developments at Bertha Park and Perth West in order to potentially create Health/Social Care HUBs at each development to accommodate both building and parking facilities. Both will also service the new Almond valley village and provide additional support for increased housing in Luncarty. This is reflected in the uses identified for Perth West MU70 which includes land for a medical centre.

A new Secondary School is currently being built within the Bertha Park development which will provide capacity for the Strategic Development Areas. Primary school provision will also be required, the uses identified for Perth West MU70 include land for two double stream primaries, and developer contributions will be sought in line with Policy 5: Infrastructure Contributions and Developer Contributions and Affordable Housing Supplementary Guidance.

It is not appropriate to require the delivery of all infrastructure before any development as development will be needed to help cross fund infrastructure delivery. Delivery of and appropriate maintenance arrangements for infrastructure will be secured alongside development at the planning application and masterplanning stage.

No modification is proposed to the Plan.

Economic Development

The Perth West MU70 allocation makes provision for 25ha of employment land in prime locations including adjacent to the A9. This is aligned to the vision of the Tay Cities Deal with the Perth West Regional Logistics, Fulfilment and Business Innovation Park included as a proposal. There are employment and infrastructure elements within the Tay Cities Deal bid (CD006, p81). The proposal is based on established user demand and is built around the smart cities and circular economy agendas and should help leverage long term job creation in value added sectors including technology, and energy and logistics. These

prime sites would provide a significant long term economic development land supply at a key location. This helps ensure that the Council is providing suitable opportunities for sustainable communities and economic growth.

There are also significant other employment opportunities elsewhere within the Perth North/Northwest Strategic Development Area. This includes a significant employment allocation (E38: Ruthvenfield Road, 23.6 hectares) identified at an appropriate location nearby adjacent to the existing Inveralmond industrial estate, alongside in excess of 25 ha of land at Bertha Park. This helps ensure that the Council is providing suitable opportunities for sustainable communities and economic growth

No modification is proposed to the Plan.

Greenspace, habitat and recreation

Impact on greenspace, habitat, and recreational access was considered through the SEA (CD075, p231-250) and HRA (CD056, p80) and appropriate mitigation has been identified through the site specific developer requirements and through identification of important existing woodland and trees as protected open space. Provision and maintenance would be further considered and detailed at the masterplanning and planning application stage.

SNH (0353/04/001): It is noted that the site specific developer requirements regarding Construction Method Statement, other surveys and species protection plan are not relevant for this site as it was screened out under HRA (CD056, p80).

No modification is proposed to the Plan. However although this is not the subject of an objection, if the Reporter is minded to accept the HRA conclusions, modification to delete requirements regarding Construction Method Statement, and other surveys and species protection plan the Council would be comfortable with making this change as it would not have any implications for any other aspect of the plan.

SNH (0353/01/022): SNH seek that the active travel links mentioned in bullet 2 should stipulate these are segregated.

No modification is proposed to the Plan. However if the Reporter is minded to accept the modification the Council would be comfortable with making this change as it would not have any implications for any other aspect of the plan.

SNH (0353/01/022): SNH seek the legend to be change from 'core routes' to 'off road cycle and pedestrian routes'. As discussed in the Perth Transport and Policy 4 schedule 4 the reason for identifying as core routes is because there will be secondary routes therefore this proposed change is resisted.

No modification is proposed to the Plan.

Cultural heritage

James Ewan & Fraser Niven (0613/01/2): There is a site specific developer requirement to 'Preserve setting of Mains of Huntingtower, Huntingtower Castle and key scheduled monument at Huntingtower Cairn' and for 'An archaeological programme of works with results feeding into a mitigation strategy for the preservation of heritage assets in situ or by record'. This is sufficient for the LDP stage as it recognises the constraint. How this is

protected and integrated will be a matter for the planning application and masterplanning process.

No modification is proposed to the Plan.

1st Marquis of Montrose Society (0413/01/001), Historic Environment Scotland (0580/01/006 + 008): With regard to the Inventoried Battlefield of Tippermuir there is a site specific developer requirement for 'A Battlefield Conservation Plan prior to detailed masterplan'. The Council has liaised with Perth & Kinross Heritage Trust and Historic Environment Scotland on this matter in the current LDP, and through the charrette and the proposed LDP2. Historic Environment Scotland maintain the Inventory of Historic Battlefields, introduced in 2011. It is a list of nationally important battlefields that meet the criteria published in the Scottish Historic Environment Policy 2016 (CD132, p60-61). Tippermuir was added to the list in Dec 2012. The inventory doesn't legally protect or restrict development but requires that the Battlefield should be taken into account when change is proposed. The Montrose Society's suggestion of preservation of the initial deployment area seeks more protection than envisaged. The current developer requirement provides a suitable context for any future masterplanning and planning applications and ensures the heritage interests can as Historic Environment Scotland suggest 'influence development' and can inform the layout and open spaces.

The battle is relatively unknown to the general public, however the preparation of a Battlefield Conservation Plan affords the opportunity to increase public awareness and potentially provide interpretive material. Battlefield interpretation could be picked up later through the Battlefield Conservation plan.

No modification is proposed to the Plan. However if the Reporter was minded to add to augment this requirement to say 'A Battlefield Conservation Plan prior to detailed masterplan including proposals for interpretation.' then the local authority would be comfortable with this modification as it would not have any implications for any other aspect of the plan.

Surface water

There is a site specific developer requirement for a Drainage Impact Assessment (DIA) which will clarify the surface water issues and also for 'An integrated surface water and drainage strategy based on surface water flow patterns, aligning surface urban drainage systems (SuDS) locations with the green network across the site wherever possible.' Future planning applications would need to meet these requirements, and the full policy provisions of 51C: Surface Water Drainage (CD052, p83), and the Flood Risk and Flood Risk Assessments (Developers Guidance note on flooding and drainage) Supplementary Guidance (CD055) which ensures that the SuDS shall avoid pollution of the environment and attenuate flows to greenfield runoff levels.

No modification is proposed to the Plan.

Quarry and Huntingtower area

During the late 20th century the quarry was used as a landfill site and was finally capped circa. 1995 and is being actively filled in with controlled inert material and facilitates recycling services in the local area. The ground stability data for the area notes that the area is at very low risk from both compressible and collapsible ground stability hazards.

The risks of landslide and ground dissolution are also noted as very low. The potential for running sand and shrinking or swelling clay is noted to be very low. Initial work to prepare a Masterplan Framework for Perth West (CD135) did not recommend any development at the disused Huntingtower Quarry and suggested that it may form part of the greenspace network. The quarry's future use and the integration of the proposed development with East and West Huntingtower would be further considered through the planning application and masterplanning process.

No modification is proposed to the Plan.

Woodland

SNH (0353/01/022 + 0353/03/001) and Woodland Trust Scotland (0462/01/008): During the preparation of the Perth West Masterplan Framework the A9 access point was discussed in a meeting with Transport Scotland on the 5th of August 2015. It was considered at that meeting that the proposed location of the junction is roughly where it needs to be. The minute (CD139, p1) states that, "Potential 1.5km spacing of the A9 interchange from the Broxden Roundabout slips is an estimate and will be confirmed at the future detailed transport assessment and modelling stage. The exact configuration of the interchange would also be confirmed at the detailed design stage." Ancient Woodland located to the south of the A9 could therefore be affected by the junction. It is neither desirable nor viable to move the junction beyond the West Lamberkine woodland due to landscape and visual impacts. Transport Scotland are agreeable to the principle of this new junction on the basis that such an access would replace the at-grade junction with Tibbermore Road. This would require a connection road from the access road to the Tibbermore Road with likely woodland impacts.

The Council disagrees with SNH that MU70 would lead to fragmentation or disconnection of important forest habitat networks and considers that significant net public benefit can be achieved. The ancient inventory woodland of West Lamberkine Wood is shown on the forestry plan for felling and replanting post 2032. Up to this period there will be thinning and it could potentially be opened up to amenity use, with advanced planting along boundaries and key views, to ensure a robust and more useable woodland structure is retained/created. The larch and birch plantations in particular would be well suited to amenity use. The potential exists to refine and extend the forestry around Lamberkine Wood. The site drawing is indicative and the width of the new woodland planting would be considered through the masterplanning and planning application processes.

The Woodland Trust Scotland suggestion for ancient woodland to remain intact and for a buffer area and native tree screen planting goes beyond the scope of Scottish Government policy. Consistent with SNH's guidance on the Inventory, the exact location of ancient woodland requires detailed surveys. Scottish Planning Policy does not refer to Ancient Woodland Inventory (AWI) it focuses on ancient semi natural woodland referring to the more accurate Native Woodland Survey of Scotland 2013. Scotland's Native Woodlands Results from the Native Woodland Survey of Scotland (CD133, p15) states that many ancient semi natural woods were converted to plantations by felling and replanting and states that 'The SAWI was published as a provisional inventory as it was based mainly on map records and was not verified by field survey. The NWSS therefore gives us the first national update and picture of the current status of ancient woodlands.' The NWSS shows that there are just small discrete areas of semi natural woodland (MD200) within the AWI on MU70. The Plan seeks to avoid loss of the ancient semi natural woodland at Lamberkine as there is a strong presumption against its removal in

Scottish Government's Control of Woodland Removal Policy (COWR) (CD007).

SNH recommend a detailed woodland survey. The site specific developer requirement for 'Access into the site to limit the loss or fragmentation of the ancient woodland and avoid loss of ancient semi natural woodland at Lamberkine and the requirement to compensate for loss by extending native planting north and south' is in line with Scottish Government's Control of Woodland Removal policy (CD007) and Scottish Planning Policy paragraph 216 (CD004, p49). However the current site specific developer requirements do not detail the survey requirements, or that this survey should be used to inform access arrangements. These surveys could be clarified at the masterplanning and planning application stage however it might be beneficial to highlight this in the LDP.

No modification is proposed to the Plan. However if the Reporter was minded to support SNH's suggested additional and augmented developer requirements regarding woodland survey and that the access arrangements should be informed by this then the local authority would be comfortable with these modifications as they would not have any implications for any other aspect of the plan.

Other constraints and considerations

Noise and light pollution, and district heating are in the policy provisions of LDP2 and will be considered in detail at the masterplan and planning application stages. There is also a site specific developer requirement for 'Noise Impact Assessment (and possibly noise attenuation measures adjacent to the A9).' With regard to district heating there is a site specific developer requirement 'Energy statement is required investigating the potential for the provision of, and/or extension to, a heat network to serve the development. The Energy Statement will be expected to consider possible linkages to MU73.'

No modification is proposed to the Plan.

MU70 Cemetery search area

There is currently an identified need for a new cemetery within the Perth area as Wellshill Cemetery will reach capacity in the next 20 years. A site of circa 8 hectares is likely to be required to serve the Perth area. Two potential areas of search were identified in the MIR (CD046, p40-41), one at Isla Road and the other at Perth West. Whilst Isla Road was the preferred option in the MIR, investigations are not well enough advanced on the assessment of ground conditions to determine if the land is suitable for cemetery use. Please refer to the Perth City Proposals schedule 4 for consideration of the Isla Road site.

At Perth West there is a cemetery search area identified within the allocated area and also within the woodland. A SEA assessment was carried out which assesses the merits of this proposal within the woodland (CD075, p169-180). It is considered that a cemetery use maintains a recreational function and is a compatible use for the green belt and is specified under Policy 41 Green Belt category (f) as essential infrastructure. The landscape impact would be minimised to maintain the rural character retaining and protecting important trees and woodland and providing appropriate boundary treatments. The character and design of a cemetery within the woodland would need to respond to its context and could provide a high amenity setting.

There are three sections of the woodland site identified in the NWSS (MD200) that should

be avoided. Scottish Planning Policy paragraph 216 (CD004, p49) does not refer to Ancient Woodland Inventory (AWI) it focuses on ancient semi natural woodland referring to the more accurate NWSS 2013. It is considered that a woodland location might provide an appropriate setting for the cemetery.

No modification is proposed to the Plan. However if the Reporter was minded to support SNH's suggested augmented developer requirement to state that the access arrangements planned, including connection to the existing Tibbermore should be informed by woodland survey then the local authority would be comfortable with this being further amended to include the cemetery provision as well as the access arrangements as it would not have any implications for any other aspect of the plan and it would provide greater clarity.

With regard to SEPA's concern regarding groundwater this is only identifying a search area so no modification to the Plan is sought. However if the Reporter was minded to support SEPA's suggested developer requirement that ground investigation is undertaken in line with their Guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32) (RD023) before any development occurs at the site then this could be added to the developer requirements for MU70.

MU73 Almond Valley

Stephen and Victoria Watkins (0108/01/002), Derek Orr (0141/01/001), Drs Gordon and Helen Allot (0273/01/001) Thomas Guthrie (0396/01/001) Huntingtower Ruthvenfield Conservation Group (0666/01/001 + 003) May Smith (0667/01/001 + 002,+ 003) Joyce and Mike Nairn (0671/01/002 + 003):

Principle of allocating MU73 and its proposed extent

The principle of the development of this allocation was first established in the Perth Area Local Plan (adopted 1995) (CD138, p26), and was continued in the Perth and Kinross Local Development Plan (CD014, p79+319) (by then including land opposite H319 to the east of the existing Ruthvenfield primary) (adopted February 2014). The Almond valley MU73 allocation now also benefits from an in principle planning permission 15/01157/IPM approved 14 September 2017 with indicative layout plan (CD189). All issues raised relating to this allocation have either been addressed previously during development plan preparation, and/or during the appeal of the 15/01157/IPM planning application. This permission (CD188) covers the majority of the site apart from land opposite H319 to the east of the existing Ruthvenfield primary. The landowner of this land was not part of the consortium bringing forward the in principle application but the principle of its development is considered acceptable and can be brought forward independently.

This housing market area is dominated by reliance on larger strategic sites and if one of more of these stalls there is a need for the flexibility. In other circumstances if one or more smaller housing allocations do not deliver as expected then the flexibility and choice of the many other housing allocations will ensure a sufficient housing land supply is maintained until the next review of the LDP, but a reliance on larger strategic sites results in greater flexibility in numbers. Objections to Greater Perth housing land requirement and to the phasing of the Strategic Developments Areas are considered in more detail in the Housing

Land Strategy schedule 4. However it is not appropriate to constrain this allocation until Bertha Park's completion as this would constrain market competition and limit growth. The principle of development MU73 is already established and the phasing of the Almond Valley development can be further considered through future detailed planning application/s.

No modification to the Plan is sought.

Archaeology

Perth and Kinross Heritage Trust (0272/01/11): The planning permission (CD188, p11) have conditions 38 and 39 attached to it which: secure archaeological investigation; and requires a plan detailing the sensitive design of the development to protect and maintain the setting of the scheduled monument at Huntingtower Cairn.

No modification to the Plan is sought. However if the Reporter is minded to accept the modification to include a requirement for archaeological investigation, and for a plan detailing the sensitive design of the development to protect and maintain the setting of the scheduled monument at Huntingtower Cairn the Council would be comfortable with making this change as it would not have any implications for any other aspect of the plan.

Economic development

There are significant employment opportunities within the Perth North/Northwest Strategic Development Areas. This includes a significant employment allocation (E38: Ruthvenfield Road, 23.6 hectares) identified at an appropriate location nearby adjacent to the existing Inveralmond industrial estate, alongside in excess of 25 ha of land at Bertha Park, and in excess of 25 hectares at Perth West. This helps ensure that the Council is providing suitable opportunities for sustainable communities and economic growth.

No modification to the Plan is sought.

Amenity, trees and open space

Development would bring about some change in character and amenity here from its semi-rural feel. However the majority of the amenity trees/woodland, along with a setback from and protection of the attractive green corridor along the river and the lade will be retained and integrated into any future detailed planning applications. Future applications would fall to be considered against the relevant provisions of the development plan including the need to protect residential amenity. New landscaping, opens space and planting will be required to ensure high amenity and meet the policy provisions for open space, trees woodland and development, and placemaking. The indicative layout submitted with the in principle planning permission shows how this might be brought forward however these are reserved matters that will be considered in detail if/when permission is sought for Approval of Matters Specified in Conditions. There is condition 10 of the in principle permission (CD188, p 5-6) which 'requires schemes of hard and soft landscaping works shall be submitted as part of the matters specified by condition application for each phase of development. Details of the scheme shall include: b) Existing landscape features and vegetation to be retained, and d) The location of new trees, shrubs, hedges, grassed areas and water features'.

No modification to the Plan is sought.

Flood risk and drainage

Concerns regarding drainage and flood risk have been considered through the in principle application and FRA. However if/when permission is sought for Approval of Matters Specified in Conditions they will be considered in more detail with a condition associated to the in principle permission (CD188, p32) which requires '5 n) Detailed flood risk assessment at each phase as specified in the delivery plan' and '7 b) Full drainage calculations and the final layout and depth of the proposed SUDS pond and associated infrastructure to be agreed in writing with the Council as Planning Authority, in consultation with the Council's Flooding Team to ensure the discharge of any surface water drainage shall be limited to the greenfield runoff rates as detailed in Appendix 9.2 Drainage Strategy) of the Environmental Statement. The agreed detail shall thereafter be implemented prior to the completion of the development'

SEPA (0742/01/087): In response to SEPA concerns this same issue also comes up in relation to allocations H1 Scott Street/Charles Street, and H319 Ruthvenfield so a common summary of SEPA's position and response to it is given under the sub heading below 'Land allocations defended by appropriate flood protection schemes' in the Policy 50 New Development and Flooding Schedule 4.

No modification to the Plan is sought.

Infrastructure provision

Please refer to the response regarding infrastructure provision within the MU70 Perth West response above. This response details and considers the provisions made within the Perth North/Northwest Strategic Development Area to be sufficient. There is also a MU73 site specific developer requirement to 'Implement the phasing programme for the housing, affordable housing, community facilities, open spaces, transport infrastructure contributions, road improvements, structure planting, and local centre in line with the planning permission/obligations S75 legal.'

No modification is proposed to the Plan.

Other constraints

There are high pressure gas mains along the southern and eastern boundaries and beneath existing roads. Again this is an issue that will be addressed through the design and layout if/when permission is sought for Approval of Matters Specified in Conditions.

The specification of lighting, the noise mitigation for properties that face the A85 and CTRLR are other matters specified in the conditions that will be addressed if/when permission is sought for Approval of Matters Specified in Conditions.

No modification is proposed to the Plan.

MU168 North of Bertha Park

Springfield Properties PLC (0455/1/6), John Andrews (0322/01/002), Alistair Godfrey (0410/01/019) + (0410/02/001), Bruce Burns (0663/01/002 + 006), and Luncarty,

Redgorton and Moneydie Community Council (0703/01/003 + 004):

Emergence of this proposal and its location

The 15/01112/IPM permission (CD191) was granted after the park and ride consultant's report was produced but because there was no certainty over the identification of this site in the LDP2 review the planning application reflected the extent of Bertha Park in LDP1 to ensure that this planning application was not contrary to the Development Plan. The planning system is Development Plan led. If possible the best way for matters of this nature to be considered and resolved is through the Local Development Plan review as this allows consideration of public views by an independent Reporter.

The DMRB stage 2 assessment accompanying study (CD184) for the CTRLR investigated the potential operational impact of a park and ride in the vicinity of the proposed CTRLR/A9 grade separated junction considering different potential locations from an operational impact and an access and visibility perspective, and a preferred option chosen which is closest to the junction. It is logical for the proposed Park and Ride to be located on the north side of this junction. The Council is committed to improving air quality and operationally this option best meets the objectives the Shaping Perth's Transport Futures (CD009). This option requires this extension to the Bertha Park boundary to accommodate the park and ride facility. Within this allocation there would also be potential for additional employment land to be delivered.

Landscape and Green Belt

The SEA of this site (CD075, p218-230) acknowledges landscape and visual sensitivity. This site lies on a north facing slope whilst most of Bertha Park lies on south facing slopes. However there is a south facing slope on the northern part of the site that could be retained to provide containment and the trees along the boundary of the A9 already filter views (CD134). This park and ride location was consulted on in the LDP2 Main Issues Report (CD046, p39). The Council agreed with SNH's comment that there should be a requirement for new native woodland planting toward the open rural landscape to the north, east and west, and in views from the A9 and CTRLR to minimise the landscape and visual impact of the development. Also the site requirement acknowledges the need for a tree survey and to retain existing trees along A9. The policy provisions of the LDP2 particularly those in relation to landscape and placemaking will ensure a high quality of design and layout.

The LDP green belt policy does allow for 'essential infrastructure such as roads and other transport infrastructure'. The Council should have looked longer term when defining a Green Belt in LDP1 but with no experience dealing with a Green Belt some limited refinement of it has proven necessary through LDP2. The SPP paragraph 50 (CD004, p15) acknowledges that, 'In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.' The proposed LDP2 Green Belt boundary would still follow a defensible boundary here when it picks up the tree planting that will be established here. This new planting together with existing woodland to the north and west will in time provide a robust boundary.

This allocation together with the Luncarty allocation, the A9 realignment, and the CTRLR has the potential to impact on the character of this area. However each project will be managed in terms of landscape/visual and amenity impacts and good design and layout

and landscaping can suitably address concerns and limit the impacts. Suitable mitigation is identified for these allocations in the site specific developer requirements and in the policy provisions of the Proposed LDP2. These projects would consider this matter in more detail through their respective planning applications and where applicable their Environmental Impact Assessment process.

No modification is proposed to the Plan.

Scale of the Park and Ride and extent of allocation

DMRB stage 2 assessment accompanying study included an indicative drawing for the Park and Ride (CD184, p6). This drawing of the Park and Ride shows its location would overlap the existing area of major development for Bertha Park and the new MU168 allocation. There is land within the MU168 site which will likely be taken up by the A9 realignment, whilst there is an area (approximately 2.4 hectares) to the west that if allocated in the adopted LDP2 could be available for employment uses (MD202). The design of the Park and Ride is indicative at this stage as the detailed design of the carriageway, structures, associated paths etc. will be finalised as part of the DMRB3 process which has only recently commenced. The indicative design has a 5 hectare site. The Broxden site is quite a small and restrictive site. Whilst this 5 hectare site is quite a large site it includes potential for future expansion to take the facility up to a 556 car parking spaces and 19 disabled spaces and the potential for other associated uses such as EV hubs/solar, hydrogen, bus stop provision etc.

No modification is proposed to the Plan.

Cultural heritage

The SEA considered that there are no significant cultural heritage constraints relating to the development of this site, but there are archaeological records for a circular enclosure within the site and a fort overlapping to the north of the site. There is a site requirement for 'An archaeological survey to be undertaken and impacts on the historic environment will be avoided wherever possible through sensitive layout and design.' There are other features in the wider surrounding area. There is unlikely to be significant impact on them given their separation from the site. From a landscape and visual impact perspective their presence may influence proposals coming forward but the policy provisions of the Local Development Plan are sufficient to ensure appropriate sensitivity.

No modification is proposed to the Plan.

Amenity and access

The Council is committed to improving air quality and operationally this option best meets the objectives the Shaping Perth's Transport Future (CD009). Potential impacts of this proposal on amenity and biodiversity can be considered and appropriately mitigated at the planning application stage. There are appropriate policy provisions to enforce this along with the site specific requirement for survey and retention of trees and new tree planting. There are no core paths or rights of way within the site. Core path LUNC/124 Pitmurthly via Redgorton House (Manse) to A9 opposite Belvedere lies roughly 250 m to north of the site, and core path LUNC/102 lies on the opposite side of the A9.

No modification is proposed to the Plan.

Restriction on uses

The site is identified for general employment uses indicating there might be some flexibility on the uses here, excluding residential or retail that is principally for visiting members of the public, and for any uses which would generate significant footfall (they would be subject to sequential assessment). However a mixed use proposal including motorway type services would not be inappropriate for this location next to the Park and Ride and with easy access to the strategic road network.

No modification is proposed to the Plan.

MU345 Bertha Park

Woodland Trust Scotland (0462/01/006+007), Huntingtower Ruthvenfield Conservation Group (0666/01/002), May Smith (0667/01/002):

Bertha Park has an in principle planning permission 15/01112/IPM (CD191) and detailed permissions are in place relating to the 1st phase including 15/01109/FLM (CD190). There has been some limited tree loss to deliver the CTLR. Condition 13 of this permission (CD191, p6) required, 'Prior to the commencement of development apart from the extraction of the economic mineral resource a woodland management plan for a minimum of twenty years, including long term objectives, management responsibilities and maintenance schedules for all woodland areas within the site shall be submitted to and approved in writing by the Planning Authority. Thereafter the woodland management plan shall be carried out as approved on commencement of the development hereby permitted unless otherwise approved in writing by the Planning Authority.' A Bertha Park woodland management plan (CD140) was prepared to meet this condition of the in principle planning permission. The main management focus of this is on providing a safe woodland environment for recreation, and sensitive remedial tree work within the context of maintaining woodland cover. Within Phase 1, new structural landscaping is proposed providing a new framework for Phases 1, 2 and 3. These new landscaped areas provide important green corridors between Bertha Woodland to the north and River Almond to the south. These new areas of planting will be established early in the programme so as to mature as the development precedes creating shelter and a landscape framework.

No modification is proposed to the Plan.

SNH (0353/04/001): With regard to SNH it is considered that amending the Site Specific Developer Requirements to incorporate mitigation measures as set out in the Habitats Regulations Appraisal (CD056) would provide greater clarity and transparency for applicants in terms of how the provisions of the Plan's Policy 36A: International Nature Conservation Sites (CD052, p63) apply to this site.

If the Reporter is so minded the suggested additional text by the respondent, as detailed in the 'Modifications Sought' section, should be added to the Site Specific Developer Requirements.

Reporter's conclusions:

Reporter's recommendations:

--