

Issue 30	Greater Perth North and East – Outwith Core	
Development plan reference:	Bankfoot (p.128) Burrelton/Woodside (p.150-151) Cottown (p.163) Errol (p.190) Grange/Errol Airfield (p.201-202) Kinfauns (p.217) Rait (p.290) Wolfhill (p.313)	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Mr Robert Morris & Sons Ltd (0013) Mr Gavin Morris (0049) King James IV Golf Club (0131) William Service (0154) Donald Soutar (0155) Morris Leslie Group (0241) Perth & Kinross Heritage Trust (0272) Stewart Milne Homes (0290/02) Edrington Group (0414)		Errol Community Council (0445) Errol Estate (0472) Mr G Sinclair (0597) P Keir Doe (0598/08 & 0598/10) Zurich (0607) A & J Stephen Limited (0622) Alastair Baptie (0662) Scottish Environmental Protection Agency (SEPA) (0742)
Provision of the development plan to which the issue relates:	Greater Perth North & East Settlements outwith Core: Bankfoot, Burrelton/Woodside, Cottown, Errol, Grange/Errol Airfield, Kinfauns, Rait, Wolfhill, Landward sites	
Planning authority's summary of the representation(s):		
Bankfoot Zurich (0607/01/001): Proposes the allocation of Site H179 for housing in the Proposed LDP2 (Maps: MD105 & MD106). The Proposed LDP 2 identifies Bankfoot as a settlement with the ability to grow in future years. The settlement has a reasonable range of services and has very good connections to Perth, along the A9. PKC's reason for not including any sites for the allocation of housing in Bankfoot was due to the risk of flooding, drainage capacity and capacity constraints at the local primary school. Zurich has the following comments on these constraints: <ul style="list-style-type: none">Flooding/Drainage: Bankfoot has a history of flooding and though the Flood Prevention Scheme for Bankfoot was deemed financially unviable in November 2016, some localised action has been undertaken in recent years to manage the flood risk within Bankfoot. Site H179 has no water courses within or adjacent to the site, though the site does have a small area of medium probability surface water flooding to the south. Sustainable drainage measures could be introduced to mitigate surface flooding as part of a future development.A well-designed site layout for H179 would also take the medium flood risk probability into consideration and as such. high density housing would be located to the north of the site and low - density housing would be located to the south of the		

site.

- School Capacity: The local primary school has reached capacity. Developer contributions could be requested to help reduce the impact on the school.
- Access: PKC identified access to the site to be a constraint in terms of reasons for the sites non-inclusion. Direct access would be gained from Highfield Road, with an extension to the road implemented in an 's' shape within the Site, to respond to its topography.

Burrelton/Woodside

Robert Morris & Sons Ltd (0013/01/001); Gavin Morris (0049/01/001): Object to the Burrelton & Woodside settlement boundary and propose a modification incorporating an area of land into the boundary and allocating it for housing (Site H406, Maps: MD107 & MD109). This for the following reasons:

- The area is not economically viable for agricultural as it is narrow, too steep and very wet
- It is close to an existing residential area and would round off the settlement boundary
- It was included in the Burrelton 2004 settlement boundary
- It was in the draft LDP until it was taken out by the Reporter
- There is limited zoned areas for housing and strong demand
- All utility services are available
- It is an accessible site

William Service (0154/01/001): Objects to Housing Allocation H17 (Map: MD107) in Woodside for the following reasons:

- It was previously refused planning permission in 2004, a decision upheld by an independent Reporter
- Access onto the A94 is at a blind corner
- Concerns that additional waste water would further exacerbate drainage issues in the area
- The development would change the nature of the village and break the natural line between Burrelton and Woodside

Stewart Milne Homes (0290/02/001): Considers that the area of open space south west of Burrelton should be removed and that the area should be returned to white land (Map: MD107). It is agricultural land and the zoning is considered unreasonable as it will not be made available by the landowners for open space. It was zoned as residential in the 1996 Local Plan and therefore the principal of residential development has long been established (CD138). The site was considered constrained at this time due to Scottish Water delivery issues but these have since been removed. The site is now proposed with an additional area (Site MU420, Maps MD107 & MD111) for a mixed use development for the following reasons:

- The scale of development is appropriate to the size of the existing village and positive discussions have taken place with the community council as regards helping facilitate a school extension and community hall through additional development in the village.
- As well as improving infrastructure within the settlement, affordable housing will

also be provided which will assist the rural economy and help sustain existing facilities including the local shop. Development in Burrelton will ensure that a good range and mix of marketable locations supporting improvements to infrastructure as required by SPP are delivered through the Local Development Plan.

- The site can provide access to the existing road and footpath network as well as the public transport network which has regular buses to Perth and Coupar Angus.
- The site is within and adjacent to the settlement boundary and is therefore a logical location for sensitive residential development. The site should therefore be zoned for housing in LDP 2.

Stewart Milne Homes (0290/02/002): Identifies a further area of land for a residential led mixed use development of 200 houses (Site MU184, Maps: MD107 & MD110). They consider this site appropriate for the following reasons:

- The Perth Core Area should not be the sole focus of development and the identification of this site in Burrelton would provide a choice of location as not everyone wants to live in the larger, main settlements. Failure to identify appropriate levels of development in smaller settlements may displace potential growth and opportunities in these areas, and suppress the natural market for smaller scale growth.
- The proposed development will comprise a range of house types and tenures to meet market demands and the needs of the community including affordable housing.
- The opportunity for appropriate employment opportunities will also be explored.
- Structure planting will be designed into the development creating links through open space providing wildlife corridors and adding to the setting of Burrelton.
- The detailed design of the site will be developed through community engagement informing the masterplan for the site.
- The site is adjacent to the settlement boundary and is therefore a logical location for sensitive residential development. The site should therefore be zoned for residential mixed use development in LDP 2.

A & J Stephen Limited (0622/01/003): Considers that there no deliverable sites for housing in Burrelton currently and propose the two sites at Nethermill Farm for housing allocations (Site H358, Maps: MD107 & MD108). They consider it to be appropriate for the following reasons:

- Both the sites at Nethermill Farm were considered through the previous LDP Examination, as were other opportunities within and adjacent to the settlement. In consideration at the previous MIR stage, Officers were of the opinion that if other sites did not come forward then the subject lands could potentially contribute towards the delivery of the spatial strategy (CD015, page 505).
- Through Examination, the Reporter was equally clear that the Plans proposed site to the North of Whitelea Road (H16 - 100 houses) was too large for a non-principal settlement and had no landscape justification. He therefore deleted the site.
- We note that north of Whitelea Road is now shown as open space within the Proposed Plan.
- The Reporter retained site H17 Church Road for 20 houses on the basis of local land supply delivery and that TAYplan does not preclude development outwith Principal Settlements (CD015, page 509). Whilst we agree that TAYplan does not preclude development outwith principal settlements, and the Reporter retained H17 in good faith, Site H17 is again retained with this Proposed Plan, has no planning

consent, is constrained by access and is proving ineffective in delivering local land supply. Indeed, since its allocation in 2014, the site has simply slipped in delivery in successive audits, 2015 - 2017, and is consistently shown as being 3 years away from a site start. Site start is now shown as 2020/21 and with the CTLR embargo due to be lifted in 2019, the sites lack of delivery cannot therefore be attributed to that factor alone. The reality is that there is no reason to believe that it will not simply continue to slip in successive audits.

- Burrelton therefore has no appropriate residential proposal and we continue to 1 consider that the subject lands represent the most logical direction for appropriate and deliverable settlement extension. A first phase to the east of the A94 is capable of delivering the constrained land requirement and a second phase to the west of the A94 can provide ongoing continuity of supply.
- The sites directly abut the southern edge of the Burrelton settlement boundary and the proposed use is compatible with neighbouring uses.
- The proposal would be to phase the delivery of the two sites with phase 1 being to the east of the A94, phase 2 directly to the west. Residential use of mixed densities would characterise the site similar to surrounding uses together with community woodland and community walking routes on the southern boundaries of the sites.
- The southern boundary of phase 1 is screened by the existing agricultural buildings, although suitable separation of uses is proposed. The southern boundary of phase 2 is characterised by an existing 20 metre belt of mixed structural tree planting which is now well established.
- The subject land also lies on the A94 with good connections to employment opportunities at Perth and the Park and Ride at Scone. The A94 is also a bus route which provides the 57 Stagecoach service to Cupar Angus and Forfar to the East and to Scone and Perth to the West. The bus stops and local facilities are within easy walking distance of the site.
- All service connections are available and it is not anticipated that there will be any abnormal issues over and above normal servicing requirements.
- Both areas of land are well contained visually by strategic planting and existing development and the exiting perimeter tree belt forms a green corridor which links the site with the Burrelton Burn and the countryside beyond.
- In terms of timescale of delivery, the current LDP and Proposed LDP place an embargo on detailed consents of 10 or more until such time as the Cross Tay Link Road (CTLR) is a committed project. The Proposed Plan anticipates that the embargo will be lifted in 2019, therefore the subject lands, subject to allocation and appropriate consents, will not be constrained from timeous delivery. This is in contrast to the H17 allocation which, in the ongoing knowledge that the CTLR embargo will be lifted in 2019, remains within the 2017 Housing Land Audit for delivery, at only 5 units per annum, beyond that period (CD050).

SEPA (0742/01/045): Supports the site requirement for a Flood Risk Assessment for H17 Housing Allocation.

Cottown

Errol Estate (0472/01/005): Considers the current settlement boundary will only allow settlement expansion on an area to the north-west which cannot be released for development because of the status of its agricultural tenancy. Therefore to allow the village to have some development scope, the Estate wishes to see an allocation or an extended settlement boundary to the east. A plan is attached showing this proposed extension (Site H166, Maps: MD112 & MD113).

Alastair Baptie (0662/01/002): Considers that Upper Mains Farm should be incorporated into the settlement boundary (Site MU359, Maps: MD112 & MD114). The steading is soon to become redundant and the outbuildings are considered to be unsuitable for modern farming machinery. The farm's field could be used for access and amenity space. The respondent proposes that the site be considered for a pioneering "dementia village" or specialist care facility which could also provide local employment.

Errol

Errol Community Council (0445/01/002): Notes the recent extension to the primary school now results in the boundary of the Conservation Area cutting through the middle of the school building. They suggest that perhaps it would be logical to redraw the boundary to include the whole of the school building.

Errol Estate (0472/01/003): Proposes an allocation (or allocations) for "Long" land at Errol as per the plans in the appendices attached to this submission. There are no other allocated housing sites in the Carse of Gowrie other than Grange and Errol Airfield. Errol continues to be a well-established and resilient village that supports a number of key services, and has space to expand. Errol has seen steady build out of the housing area to the north whereas no building has started at Grange and Errol Airfield. Given the range of facilities in Errol Village, the settlement strategy and allocation of land at Grange and Errol Airfield rather than at Errol Village is hard to justify.

Errol Estate (0472/01/004): Suggests there are two areas which are suitable for expansion at Errol:

- 1) Site at Northbank (Site MU108, Maps: MD117 & MD116) – they consider this a longer term development. Long allocations give both flexibility and certainty to Development Plans and communities. They allow Local Authorities to release additional development land during a plan period in a planned and managed way on sites that have been brought to the attention of the public as potential areas of longer term growth. Errol Estate considers that the Development Plan for Perth and Kinross would benefit considerably by the inclusion of such a policy and the situation at Errol and in the Carse of Gowrie generally illustrates this point. We have mentioned the concern that the consented site at Errol Airfield may not come forward for development and therefore there will be no scope for any size of expansion in the Errol area. This will in time have detrimental impacts on local facilities and services. The Estate asks that all or part of land to the north of Errol, at Northbank Farm, Errol (as previously submitted) be allocated for long term housing (19 Hectares) including phased residential development with associated open space and affordable housing. The proposed site positioned to the north of Errol is free of environmental and physical constraints. For the reasons set out above, part or all of the land should therefore be considered as suitable for a long term housing allocation.
- 2) Site to North East (Site H409, Maps: MD117 & MD115): The smaller site in the north-east corner of the village of Errol could be easily assimilated into the village. It is our view that this essentially 'rounds off' the gap that currently exists on the east side of the Carse Road as one leaves Errol. We consider that the left side of the street is already visually interpreted as part of the village owing to the domestic-scale and form of boundary treatments and landscaping, and the residential properties and street furniture across the road. We have assessed the site for a

number of constraints comprising: flooding; natural heritage; and cultural heritage and in each category the site is entirely unconstrained. The site also lies adjacent to the Carse Road which is served by a regular bus service that links the village with both Perth and Dundee. The Carse Road is also part of the national cycle network while the Circular Errol Walk begins at the southern edge of the site. Errol Primary School is relatively new and the village of Errol itself has a number of shops and services that could be accessed on foot from the proposed site. Overall, we consider that the site is already effectively a part of the village in terms of the way that it is visually interpreted by passers-by. Allocating this site formally through the Local Development Plan would present the village of Errol with an opportunity to increase the population slightly, and would offer some new choice in the immediate housing market area giving the village some scope to grow.

The village offers a highly sustainable location for growth both in the short and long term. Situated at an equal distance from both Perth and Dundee. Errol Estate is promoting a strategic plan for the Estate focused on developing green infrastructure for recreation (including waymarked routes for cycling and walking), tourism and sustainable travel. The Estate is also looking to develop visitor accommodation for a range of markets such as bunkhouse and self-catering facilities. These facilities will provide expanded markets for the services and businesses in Errol village both existing and new and assist in regenerating this village. The village is well positioned to attract and sustain developments and enhancements associated with walking and cycling. The Estate therefore wishes to see Errol become an exemplar settlement for walking and cycling over the course of this Local Development Plan period as encouraged in National Planning Framework (CD003).

Allocating land at Northbank, Errol and the small site to the North East, would make a suitable addition to the village which would not run contrary to the established spatial strategy as set out in the Adopted Local Development Plan (2014) (CD014) or TAYplan (2017) (CD022).

Grange & Errol Airfield

Settlement boundary

Morris Leslie Group (0241/02/001): Notes that the settlement text refers to the recently granted Matters Specified in Conditions Application (Ref: 16/00999/AMM) for the Errol Airfield site, but does not reference the original planning permission for the site to which it relates (Planning application: 13/01823/FLM, RD027). Neither does it include this development as a housing allocation, stating that "if this development takes place, it [the settlement boundary] will be redrawn to encompass the built area". It is requested by Morris Leslie Group that the map on page 201 is altered to include both the application site area of Ref: 13/0183/FLM and planning permission Ref: 16/01491/FLL (RD028), which is associated with this development, and is for the new main access and associated works, as a housing allocation for circa 240 dwellings. The site is considered to be 'effective' by the Council, with it being included in the Housing Land Audit 2017 (site ref: PEL251 Errol Airfield 57.31 ha, CD050) and, therefore, no reason for it not to appear in the Plan as a housing allocation (Site references MU360 & H422, Maps: MD119, MD121 & MD123).

Errol Community Council (0445/01/001): Notes and supports the redrawing of the settlement boundary to exclude the area of the planned housing development on the Airfield. The previous inclusion of this yet to be realised development did not appear to be

commensurate with settlement boundary procedure.

P Keir Doe (0598/08/001): Considers that the settlement boundary should be re-aligned to incorporate the full extent of the World War II buildings for the Airfield and the adjacent brownfield land at Muirhouses Farm (Sites MU194 & H190, Maps: MD119, MD120 & MD122). This should be allocated for Residential and Employment Land and a Community Orchard. They consider this for the following reasons:

- It is a logical settlement extension and would make the settlement a more compact shape.
- Whilst they acknowledge that the Tayplan and the LDP are directing the majority of the development towards larger settlements, Scottish Planning Policy's cornerstone policy, is to direct development towards brownfield sites ahead of greenfield sites (CD004). Errol Airfield is one of Perth & Kinross Council's largest brownfield sites. The derelict WW2 buildings and surrounding area is also in desperate need of redevelopment and regeneration.
- The new build houses will also cross fund the construction of a purpose built commercial units to house the 30 industrial tenants which are currently operating out of the WW2 buildings and the establishment of the community orchard. Based on the extent of the proposed zoning in the Proposed Plan, it is not economically viable nor is there an adequate amount of land to build purpose build commercial units and houses and create the community orchard.
- The layout of the proposed site also connects with the isolated pocket of zoned Residential & Employment Land.
- This site may also assist in accommodating the additional 10% of housing allocation which is required.

Site allocation H21

Donald Soutar (0155/01/001): Considers that Housing Allocation H21 at Grange should have the following issues addressed when developed:

- Surface drainage. Grange has suffered flooding several times since the completion of the new housing development by Scotia Homes. The owners of South Grange Cottage have had their property substantially flooded on 2 occasions (narrowly avoiding a third) and have had to move out of their home for several months to allow it to be dried out. The surface water from the 16 houses built at Monks Walk drain to the roadside ditch which in very wet winters cannot cope with the volume of water. This results in flooding of the Horn Road which runs past this site and requires the road to be closed to traffic while the Fire Brigade/Tayside Contracts pump the water away. It is important that no more surface water is allowed to enter the roadside ditch and should be piped to the Grange Pow at Newbigging Farm which has capacity to handle that volume of water.
- Planning Conditions. it is important and only fair the planning conditions placed on my house (application number- 00/00852/FUL) are also placed on any further properties built on this site. i.e. -10 metre tree planting at south boundary at railway line, provision of a pavement to link existing and similar finishing materials.
- Road Width. The road along the frontage of this site is very narrow and should be widened to ensure 2 cars can pass. The road requires to be widened to 4.8m wide with a suitable width pavement. These were the requirements from the roads department for application 07/02810/FUL which was for building houses at Carse Grange directly opposite site H21.

- Public Open Space. Within the Report of The Public Enquiry into objections to the Perth Area Local Plan held in June 1999 it states that site H12c (now H21) 'should be allocated for housing subject to some community open space' (PKC are unable to supply copy of this document at this point in time). The community open space now seems to be missing from this proposed development and 5 extra houses have been added. There are no parks or public footpaths at Grange and none planned, therefore, it is important that this community space is not deleted from proposals for site H21 given this is one of the Carse of Gowrie historic orchards and several old fruit trees still exist on site.

Perth & Kinross Heritage Trust (0272/01/006): Recommends that the Site Specific Developer Requirements are updated to reflect the likelihood of an archaeological investigation and/or protection of Scheduled Monuments being required.

SEPA (0742/01/047): Supports the site requirement for a Flood Risk Assessment for H21 Housing Allocation.

Kinfauns

Site allocation RT1

King James VI Golf Club (0131/01/002 & 0131/02/002): Supportive of this allocation.

Edrington Group (0414/01/001): Objects to the allocation of Site RT1 at Wester Kinfauns for a park and ride facility. They consider that the Council has not demonstrated that this is the most suitable site for Park & Ride and it does not have the money to operate a Park & Ride. A CPO inquiry will be necessary because of the strong opposition of the landowner. They state that in considering whether to allocate this site the LDP Reporter will need to consider whether there is any realistic prospect of a Park & Ride CPO succeeding. If the conclusion is that it will not succeed the Reporter must not allocate the site because they will be allocating an ineffective site; acting against the landowners wishes; and blighting the site. This will have separate compensation implications for the Council, which is likely to receive a claim against it from the landowner for the alternative use value that would have occurred were the site not allocated for Park & Ride.

New proposal

Edrington Group (0414/01/002): Propose a site for predominantly residential or mixed use residential comprising of the following areas (Site MU405, Maps: MF126 & MD127):

- 2.8 acres with consent for 31 houses, with 1.7 acres of additional land
- 6 acres previously proposed for park and ride by Perth City Council
- 19.5 acres of existing offices and land

They consider that there is a more suitable use for the site for the following reasons:

- Previous use
- Well established building group
- Layout comprising roads, footpaths and landscaping
- Good accessibility
- Good existing road junctions
- Strong boundary planting and sense of enclosure

- Recent grant of consent for a smaller scheme and other ongoing planning proposals, such as the proposed park and ride

Open space

Alastair Baptie (0662/01/001): Considers that an area to the east of the settlement should not be designated as open space. It should, however, be retained within the settlement boundary (Map: MD126).

Wolfhill

G Sinclair (0597/01/001): Proposes land at Dunsinnan Road, Wolfhill as a proposed residential development opportunity site (Site H361, Maps: MD137 & MD138). Perth and Kinross Council has not undertaken a specific site appraisal of this site, despite other sites of a similar scale within similar rural settlements being fully assessed as part of the Strategic Environmental Assessment (CD074-75) that accompanies the Proposed Plan. Instead the site was considered as a settlement boundary change. It is requested that the settlement boundary of Wolfhill is extended to include this land and the site is specifically allocated for residential development for approximately 10 residential units. As a site assessment has not been carried out by Perth and Kinross Council, Graham + Sibbald has undertaken this assessment utilising the criteria contained within the Environmental Report (RD031). This demonstrates that there are no significant constraints that would prevent this site from being brought forward for residential development.

Landward sites:

Abernyte

P Keir Doe (0598/10/001): Proposes a new site for housing development (Site H274, Maps: MD204). They have also proposed a settlement boundary would be appropriate for the village. This issue is dealt with in the Schedule 4: Issue 05 Policy 6 Settlement Boundaries. This is for the following reasons:

- Settlements which are smaller than Abernyte are identified and in most cases, allowance made for housing.
- There has been a very limited amount of housing in Abernyte over the last 20 years, despite it being a popular place to stay.
- The primary school roll is down to 4 pupils and the Council's reluctance to allow for any housing in or around Abernyte is a considerable factor in the school roll dramatically dropping.
- The subject site has a robust landscape framework and is bounded by the houses and a public road to the south, rising topography to the north and a road to the west and trees to the east.
- The site would be ideally suited for accommodating a modest settlement extension.

Errol

Morris Leslie Group (0241/01/001): Requests that South Inchmichael Farm be identified as an employment allocation (Site E357, Map: MD118). A planning application (Ref: 17/01941/FLL) was submitted in 2017, and a further application is to be submitted shortly for Class 5 and Class 6 use.

Modifications sought by those submitting representations:
<p>Bankfoot</p> <p>Zurich (0607/01/001): Proposes the allocation of Site Reference H179 for housing in the Proposed LDP 2.</p> <p>Burrelton & Woodside</p> <p>Robert Morris & Sons Ltd (0013/01/001); Gavin Morris (0049/01/001): Would like to see a change to the settlement boundary at Burrelton to incorporate an area of land. They would like this land to be allocated for housing (Site Reference H406).</p> <p>William Service (0154/01/001): Would like to see the removal of Housing Allocation H17 in Woodside.</p> <p>Stewart Milne Homes (0290/02/001): Requests the removal of the open space designation to an area in the south west of Burrelton and to retain it in the settlement boundary as “white land”. They would also like an area of land to be incorporated into the settlement boundary and for it to be allocated as a housing site in LDP2 (Site Reference MU184).</p> <p>A & J Stephen Limited (0622/01/003): Proposes the inclusion of two new sites at Nethermill Farm for housing allocations and consequent changes to the settlement boundary (Site Reference H358).</p> <p>Cottown</p> <p>Errol Estate (0472/01/005): Seeks an allocation or an extended settlement boundary to the east (Site Reference H186).</p> <p>Alastair Baptie (0662/01/002): Considers that Upper Mains Farm should be incorporated into the settlement boundary.</p> <p>Errol</p> <p>Errol Community Council (0445/01/002): Change boundary of the Conservation Area to include the whole of the school building.</p> <p>Errol Estate (0472/01/004 & 005): Suggests two areas for housing allocations in Errol: site at Northbank and a site to the North East.</p> <p>Grange and Errol Airfield</p> <p>P Keir Doe (0598/08/001): Would like the settlement boundary to be re-aligned to incorporate the full extent of the World War II buildings for the Airfield and the adjacent brownfield land at Muirhouses Farm. This should be allocated for Residential and Employment Land and a Community Orchard (Site reference H190/MU194).</p> <p>Morris Leslie Group (0241/02/001): Map on page 201 should be altered to include both the application site area of ref: 13/0183/FLM, and planning permission ref: 16/01491/FLL,</p>

which is associated with this development, and is for the new main access and associated works, as a housing allocation for circa 240 dwellings (Site references MU360 & H422).

Site allocation H21

Perth & Kinross Heritage Trust (0272/01/006): Recommends that the Site Specific Developer Requirements are updated to reflect the likelihood of an archaeological investigation and/or protection of Scheduled Monuments being required.

Kinfauns

Edrington Group (0414/01/001): The representation has been difficult to understand with regards to the modifications. However, they would like to see the removal of allocation Site RT1. Furthermore, although it is not explicitly stated, it is interpreted that they wish to see the deletion of the Employment Safeguarded area and for this to become white land within the settlement boundary.

Alastair Baptie (0662/01/001): Considers that an area to the east of the settlement should not be designated as open space. It should, however, be retained within the settlement boundary.

Wolfhill

G Sinclair (0597/01/001): Would like the land at Dunsinnan Road, Wolfhill to be considered a proposed residential development opportunity site (Site reference H361).

Landward sites:

Abernyte

P Keir Doe (0598/10/001): Proposes a new site for housing development (Site reference H274).

Errol

Morris Leslie Group (0241/01/001): Request that South Inchmichael Farm be identified as an employment allocation (Site reference H357).

Summary of responses (including reasons) by planning authority:

Bankfoot

New site proposal

Zurich (0607/01/001): There is a new site proposed at Bankfoot in an area adjacent to the A9 and on the edge of the current settlement boundary. In the Proposed Plan, it is acknowledged that Bankfoot has long term potential for further housing but that key constraints on the settlement including flooding issues and the size of the school and where it is currently located mean that further work is required to identify the community needs and infrastructure that might be required. The settlement statement therefore refers to the opportunity for design based workshops to be held to establish all the key issues regarding infrastructure and help to identify future development sites for LDP3. The site

proposed (Site H179, Maps: MD105 & MD106) was put forward during the Call for Sites stage and was fully assessed under the SEA process. This assessment has been now been reviewed to respond to this most recent proposal (CD377).

Bankfoot is located just off the A9. The core of the village is within the valley with the settlement developing up the hillside to the east. The site is located on the eastern edge of the village which incorporates two large fields that sit up above the village and adjacent to the A9. There are a number of key constraints in terms of this site:

- The site lies next to the existing A9 route. The A9 is the focus of a national project that will see the entire road being upgraded to a dual carriageway. A portion of this site is required to accommodate the widened roadway which will reduce the proposed development area considerably and place potential housing next to a very busy road.
- Access to the site is extremely constrained. The lower access taken of Innewan Gardens would require considerable engineering to allow for any realistic access to the higher part of the site due to the steeply rising slope. The upper access through Highfield Place is also constrained by the existing narrow streets and steep slope within the village as well as the need to make an access point through a privately owned driveway.
- There are issues with flooding on parts of the site from water running off the higher ground as well as drainage issues. This is an issue throughout the village that requires more detailed consideration to find a solution.
- As mentioned earlier, the school is near capacity and would require an extension to accommodate a rising intake. As the school is constrained in terms of its location, further work is required to identify an answer to this issue.

The Council would therefore not consider allocating any new housing sites in Bankfoot until the wider constraints have been address. Furthermore, TAYplan sets the strategic framework for the Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth HMA. Bankfoot is not in the Perth Core Area and therefore the allocation of a large site would be contrary to TAYplan.

No modification is proposed to the Plan.

Burrelton & Woodside

Housing Allocation H17

William Service (0154/01/001); A & J Stephen Limited (0622/01/003): Site H17 is allocated in the plan for 16-26 units. This site was allocated originally in the Perth Area Local Plan (CD138). It was then allocated in LDP1 and went through the Examination process. The Reporter stated that there was “no reason to suspect that there has been any physical change in circumstances that would justify not taking this site forward” (CD015, p.509). Whilst there appears to have been little work undertaken to bring this site forward, it would be premature to consider this site ineffective. Furthermore, the argument that it should be replaced by an effective site within Burrelton & Woodside is not pertinent as the effective housing supply in this area is already more than met by allocations in other settlements. By comparison to H17, the other sites put forward have not been consulted upon and therefore the community have not had the opportunity to comment on their potential.

No modification is proposed to the Plan.

Open Space

Stewart Milne Homes (0290/02/001): Stuart Milne Homes have objected to its identification as Open Space and proposed it is returned to white land within the settlement boundary. This area is Prime Agricultural Land and is currently being farmed. The area was incorrectly identified as open space as part of a review prior to the Proposed Plan consultation.

If the Reporter is minded to change this area back to white land within the settlement boundary, the Council would be comfortable with making this change as it would not have any implications for any other aspect of the plan.

New site proposals

Robert Morris & Sons Ltd (0013/01/001); Gavin Morris (0049/01/001); Stewart Milne Homes (0290/02/002); A & J Stephen Limited (0622/01/003): There are a number of proposals that have been submitted to the south and south west of the Burrelton settlement boundary. Burrelton & Woodside is a small settlement on the A94 leading to Blairgowrie. It has limited facilities and currently has one small housing allocation for 16-26 units. One of the main arguments for these proposals is that the H17 housing site allocated at Woodside is not effective and will not be developed during this plan period. There is limited evidence to suggest that any of the other proposals could be delivered more quickly. Furthermore, the site has been through the consultation process.

The proposal put forward by Morris and Morris is for a small site to the west of Burrelton on Whitelea Road (Site H406, Map: MD109). This was assessed as part of a much larger site in the SEA after the MIR consultation (CD074, P.244-254). The submission states that the site is not economically viable for agricultural as it is narrow, too steep and very wet. These arguments are also pertinent to the potential development of this site. Indeed, the slope and drainage issues are as much a barrier to housing development as they are to agricultural activities. Moreover, this area was originally in the Proposed Plan settlement boundary for LDP1 but was recommended for removal by the Reporter and therefore taken out. It is consequently not considered an appropriate housing site by the Council.

Stewart Milne Homes propose two sites for inclusion in the Plan. MU420 is partially within the settlement boundary and this area is currently identified as Open Space in the Proposed Plan. This issue is discussed above and it is acknowledged that the identification of open space is incorrect. An additional area of the site is out with the settlement boundary. The proposed site is within Prime Agricultural Land. This site was originally within the LDP1 Proposed Plan as an allocated site referenced H16 in for 100 units (CD053). It was removed as an allocation as part of the Reporter's recommendations and the site boundary was drawn back to the boundary shown in the Perth Area Local Plan. The Reporter stated that:

"The extension of the settlement into surrounding countryside would detract from the local landscape character but, subject to extensive landscaping of the site's northern and western boundaries, the degree of such harm might be acceptable if the site could be demonstrated to be essential in order to meet the Proposed Plan's housing strategy. However, Burrelton is a small settlement with very few services and limited employment opportunities. It is not identified as one of the Plan area's principal settlements, which TAYplan Policy 1 requires to be the focus for the majority of

development. The proposed 100 houses on this site would represent a very significant enlargement of the settlement with no obvious strategic justification.” (CD015, page 509)

Stewart Milne Homes has a further submission for the area to the north west of Burrelton (Site MU184, Map: MD110). A site assessment has been undertaken for SEA purposes (CD074, p.255-64). This is another large proposal that would again impact on the rural context of the village and is located within Prime Agricultural Land. It would require considerable landscaping to reduce the visual impact and the site is not required to meet the Housing Land requirements for Perth HMA.

A & J Stephen Limited has proposed another large area directly to the south of Burrelton which incorporates the Nethermill Farm buildings (Site H358, Maps: MD108). Once again, the site is very large for Burrelton and would have a significant visual impact on the entrance to the village from the south. It is also located with Prime Agricultural Land as well as having existing farm buildings that are currently in use. Furthermore, the site is not required to meet the Housing Land requirements for Perth HMA.

TAYplan sets the strategic framework for the Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth HMA. Burrelton and Woodside are not in the Perth Core Area. TAYplan also indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area. To be consistent with TAYplan, only limited development can be allocated to settlements out with the Core Area. Large sites would not be consistent with TAYplan. The Plan already has an allocation in Woodside that provides the limited amount of development consistent with TAYplan.

No modification proposed to the Plan.

Cottown

New sites

Errol Estate (0472/01/005); Alastair Baptie (0662/01/002): Two areas of land have been put forward as potential sites within the LDP: H186 (Map: MD113) and MU359 (Map: MU359). H186 is a small site to the south of the settlement boundary. This site is located within Prime Agricultural Land and part of a much larger field with very little containment. The site would have a visual impact in terms of the rural setting of Cottown & Chapelhill. The proposal to create a mixed use site on the currently working farm is completely out of scale with the existing settlement. If the farm does cease to be used, any application for conversion would be assessed under the Housing in the Countryside policy rather than approaching this as an allocation. The settlement has no facilities and requires residents to drive to the nearest shops and services.

TAYplan sets the strategic framework for the Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth HMA. Cottown & Chapelhill are not in the Perth Core Area. TAYplan also indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie. To be consistent with TAYplan, only limited development can be allocated to the Carse of Gowrie. As the housing land requirement has been met for this area, it is unnecessary to allocate any further sites in this area.

No modification is proposed to the Plan.

Errol

Errol Community Council (0445/01/002): The conservation areas are reviewed systematically. Development Management have a ranking system that orders the review according to community pressure, date of previous appraisal, synergy of funds/initiatives and development pressure (CD065). Currently, Birnam is being reviewed as it scored the highest in the ranking system. Errol, which was appraised in 2009, is not identified for review at this current time. A fuller explanation of the issues regarding the revision of conservation areas is discussed in the Schedule 4: Heritage Policies.

No modification is proposed to the Plan.

Errol Estate (0472/01/003 & 004): Two sites have been proposed for Errol. The larger, strategic site is located to the north of the settlement and would expand the village considerably (Site MU408, Maps: MD116). It has been proposed as “long land”. The suggestion is that this would be a strategic site that would be delivered over the long term. However, Errol is not identified as a tiered settlement and therefore is not considered appropriate for large allocations. The proposal would therefore be contrary to the Council’s housing strategy. The second proposal is a small site located on the south east side of the village that could accommodate a very limited number of units Ref: H409. It is noteworthy that the site has a steep drop from the roadside and is part of a much larger field with little containment. Furthermore, Errol has seen a considerable amount of new development in recent years and building is still underway.

TAYplan sets the strategic framework for the Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth HMA. Errol is not in the Perth Core Area. TAYplan also indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie. To be consistent with TAYplan, only limited development can be allocated to the Carse of Gowrie. As the housing land requirement has been met for this area, it is unnecessary to allocate any further sites in Errol.

No modification is proposed to the Plan.

Grange and Errol Airfield

Morris Leslie Group (0241/02/001); P Keir Doe (0598/08/001): Errol Airfield has been the focus of development interest for a number of years. In 1998, a planning application proposing 1350 houses, business and commercial uses was withdrawn (98/01646/OUT). A further application for a sustainable village of 240 units was given permission in principle in 2010 (CD267, DM Report 05/02418/IPM). This permission was renewed in 2014 (13/01823/FLM, CD370) and again in 2017 (16/00999/AMM, CD371). The site is within the adopted LDP’s settlement boundary. This settlement boundary was reviewed as part of the MIR (CD141, Question 9). Following this review, it was decided that the site be removed from within the settlement boundary. As both the sites (Site references MU360 & H422) would be assessed under the adopted LDP, it is considered that this change to the boundary would not prevent the current proposal from going ahead. It would, however, prevent this site being retained in the long term if no development were to take place. The other proposal to extend the settlement boundary to incorporate additional areas of land for residential and employment land (Site references H190/MU194) would be contrary to the review. It is notable that Errol Community Council

has supported this approach to the settlement boundary.

TAYplan sets the strategic framework for the Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth HMA. Grange and Errol Airfield are not in the Perth Core Area. TAYplan also indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie. To be consistent with TAYplan, only limited development can be allocated to the Carse of Gowrie. Whilst it is appreciated that this site has historically been approved permission for development, large sites such as this that were approved prior to TAYplan are no longer consistent with the current tiered strategy and further, it is not needed in terms of the housing land requirements for this area.

No modification is proposed to the Plan.

Site allocation H21

Donald Soutar (0155/01/001); Perth & Kinross Heritage Trust (0272/01/006): The Housing Allocation H21 is a site that is in the adopted LDP and has already been through the Examination process. It is a small site adjacent to another recently developed site. Any development for this site will be required to be assessed against the LDP policies. Policy 51: Water Environment & Drainage aims to protect and improve the water environment; Policy 58: Transport Standards & Accessibility aims to ensure new developments are well accessed and that the roads “are designed for the safety and convenience of all potential users; Policy 14: Open Space Retention and Provision seeks the provision of formal & information space within new developments; Policy 26: Scheduled Monuments & Non-Designated Archaeology seeks to protect the integrity of Scheduled Monuments. The Council therefore do not consider it necessary to include further site specific requirements as these issues will be assessed against these policies at planning application stage.

No modifications proposed to the Plan.

Kinfauns

Park & Ride allocation RT1

Edrington Group (0414/01/001): Felsham Planning and Development have submitted objections, on behalf of the Edrington Group, to the allocation of Site RT1 at Wester Kinfauns for a Park and Ride (P & R) facility. They consider that the Council has not demonstrated that this is the most suitable site for Park & Ride and it does not have the funding to operate a Park & Ride. A Compulsory Purchase Order (CPO) inquiry will be necessary because of the strong opposition of the landowner.

The question of need in terms of the P&R in this location has already been through the Examination process. The Reporter stated:

“Proposals 1: Map-Proposals in TAYplan illustrates how the region will develop over the 20 years between 2012 and 2032. It identifies an indicative location for a “Proposed strategic park and ride” somewhere on the east side of Perth. Additional park and ride sites are one of a set of key infrastructure projects upon which the successful delivery of the Perth Area strategy is dependent. The principle of a park and ride facility east of Perth has been established and its location in vicinity of RT1 has likewise been established.” (CD015, p.471).

Over the past 6 years the Council has had extensive positive discussions with the owners of this site. Two concerns were raised:

- Firstly, that the design did not impinge on the views from their office building and this was addressed.
- Secondly, they were concerned about the local community views and did not wish to commit until local views had been canvassed.

The Council and their consultants, therefore, carried out a pre application consultation exercise hosted in the Edrington offices on 10 March 2015. The outcome of the consultation was positive (CD372, PAC report for 15/01808/FLM) and reported to the owners who did not object to the proposed allocation of a P & R site in LDP 1, nor did they object to the planning application 15/01808/FLM for the formation of a park and ride facility, access road, landscaping and associated works. This application was granted consent on 19 February 2016.

Early in 2016, the Edrington Group announced plans to relocate their office to the west of Scotland. Concerned about the ongoing discussion on the P & R proposal, the Council emailed the Edrington Group on 21 April 2016 to seek clarity on their position (CD373). Their response stated that the proposal for land to be purchased by PKC had received no adverse comments from Edrington Corporate Board and therefore the purchase process was assumed as clear to start (CD373). The Council's Chief Executive, Depute Chief Executive and Head of Planning & Development, met with Edrington's Corporate Affairs Director on 22 April 2016. The meeting was positive and Edrington's continued support for the Park & Ride site was assured. Following this meeting the Council's Estates Team has been in dialogue with the owner's agent regarding the Council's interest in the site. There was no indication of opposition to the proposed Park & Ride site, in view of the history of discussions. This change in position, through the objection, was somewhat surprising. However, it is fair to say negotiations have stalled in recent months.

Two issues are raised with regard to the CPO. Firstly they indicate that it has not been demonstrated that this is the most suitable site. Technically this may be the case; however, it was not necessary to do so given their co-operation through the discussions referred to above. A significant amount of work has been done on the Perth Transport Futures Project (CD009). This clearly demonstrated the need for and advantages of a P & R facility to the east of Perth. Potential location for such a facility must be sited adjacent to a current junction serving the A90. Only 2 possibilities exist, this location or adjacent to the Kinfauns junction. The later site has issues in terms of flooding and the topography of the area would be challenging. Secondly this site brings with it additional benefits of improving the bus service to the local community as demonstrated by the consultation responses (CD372). In any case it is contended that this issue is more appropriately considered at a CPO examination rather than the LDP examination.

Secondly, the objection relates to the claim that there is no funding in place to deliver the facility. Through the Developer Contributions and Affordable Housing Supplementary Guidance (CD021), financial contributions have been secured from new development towards a package of transport infrastructure measures which includes the Park and Ride scheme to the east of Perth. The Tay Cities Deal Proposal (CD006) sets a commitment to the design and implementation of a park and ride scheme to the east of Perth with £2m funding being sought towards the capital costs with the provision of ongoing revenue funding provided by the Council. Through these mechanisms, it is clear the Council is committed to funding the delivery of the scheme. In any case, it is contended that this

issue is also for a CPO examination rather than the LDP examination.

New Residential Proposal

Edrington Group (0414/01/001): The area being proposed for a housing development comprises of two distinct sections. The first being the east most section comprising 2.7 acres, with consent for 37 houses, with 1.9 acres of additional land. The northern portion is identified in the Proposed Plan as white land and in effect is covered by the general Residential and Placemaking Policies (Policies 1 & 17). The site was not identified, in the Proposed Plan as a specific housing proposal over doubts about its effectiveness. This northern portion is largely a brownfield site being a former bus depot. Its use for housing is not disputed by the Council.

The second area is the former headquarters office site. This site was granted consent in 1994 for a single user headquarters building. Being one of the three main Perth based whisky companies, Matthew Gloag and Son had outgrown their Perth headquarters in the city centre and, like the other two whisky companies, Bells and Dewars, were seeking high profile sites on the main approaches to Perth. This development was granted as an exception and was recognised as being contrary to policy.

Walnut Grove, Kinfauns is a small hamlet on the eastern approaches to Perth, it has no facilities and in the absence of a P & R, a relatively poor bus service to Perth. The site's accessibility cannot be described as good, other than by car.

The development of this large 8.4ha site would be out of scale with the current settlement and would be contrary to the TAYplan settlement strategy which directs the majority of housing land to the City of Perth and its core villages. Outside the core settlements, developments may be allocated where they can be accommodated and supported by the settlements. Kinfauns does not fit this category.

It is also contended that a large scale development in this location would have a significant landscape impact on views from and to both the Tay and the principal viewpoint from Kinnoull Hill.

To conclude, the objector's position on the P&R site directly contradicts their previous position and can provide no evidence or rational for this change. Whilst the objector does not seek the identification of the site as a specific housing proposal, they suggest that the current plan designations including the Employment Land, Park and Ride proposal and the open space are removed leaving it as white land and in effect applying the Residential Areas Policy 17.

The importance of the Park and Ride proposal to the transport infrastructure of Perth has been covered above. With regard to the employment land the strategy of the Plan is to protect employment land to facilitate the sustainable economic growth of the area. The former headquarters building is a prestige facility and an important facility offering an opportunity to attract significant employers to the area. The retention of the open space designation around the Park and Ride and headquarters building is an important element of the protection of the landscape setting of Kinnoull Hill and the river Tay. In addition, the open space designation is a key component of the protection the setting of the landscape setting of the settlement and the headquarters building.

The suggestion that a major site of 200+ houses be brought forward, without being designated as a housing proposal in the LDP and without consultation, is contrary to the

principles of the plan led Scottish planning system. The site is inappropriate for large scale residential development and contrary to the TAYplan settlement strategy. The redevelopment of the former bus depot is compatible with the Proposed Plan framework but with a lack of evidence of its viability it is not considered necessary to identify it as a specific housing proposal. Accordingly the Council see no justification to modify the plan.

No modification is proposed to the Plan.

Open space

Alastair Baptie (0662/01/001): There is an area of land currently designated as open space at the eastern end of the settlement of Kinfauns. This is located on the slip road off the A90 on the entrance into the village. This is a linear settlement developed along the old road following the Tay into Perth from Dundee. The respondent would like the open space designation to be removed but for this area to be retained within the settlement boundary. Open space is not simply about providing usable areas for recreation. It can also be an area of greenspace that provides breathing space between urban areas, creating landscape settings for settlement edges. In this case, whilst the area of land is not exceptional for any specific use, recreational or scenic, it does provide a buffer between the busy dual carriageway and the quiet back road that leads through Kinfauns. Removal of this designation whilst retaining it in the settlement boundary would mean that development of this site could take place. The development of this area would create a new more urban entrance off a busy road changing the visual entrance to the settlement. Furthermore, this site is located so close to the A90 that noise pollution could be an issue.

No modification is proposed to the Plan.

Wolfhill

New site proposal

G Sinclair (0597/01/001): This site proposal was put forward at the MIR stage of the plan. It was assessed as a settlement boundary change. A further representation has been made at Proposed Plan stage objecting to it not being assessed as a housing option. The site has therefore now been assessed under the full SEA process and has been referenced as H361 (CD378). This site was proposed during the adopted LDP process and was taken to examination. The Reporter considered that the site would have a visual impact and it was not taken forward either as a housing site or within the settlement boundary. The following statement was made regarding the site:

“When one considers Wolfhill’s relative remoteness, the lack of any services, employment opportunities or public transport connections and the fact that it is not identified in TAYplan as a principal settlement, there is no justification for any additional housing development beyond that which will be facilitated by the proposed settlement boundary. The proposed site would also be inappropriate in landscape terms. There are some low sheds to the north of the site, which it is understood are to be replaced with housing and some limited development on the opposite side of the road but these do not provide a logical landscape framework into which the settlement could expand. Even with generous landscaping, the proposed settlement enlargement would detract from the character of the local landscape by appearing as an incongruous expansion of built development into the surrounding countryside.” (CD015, p. 511)

The site is 1.2 ha of relatively flat grazing land which the existing settlement looks out on to. There is reasonable access to the site although this access would not be appropriate for a large development. The low sheds described by the previous Reporter have now been replaced by housing on the north side of the site and this creates a horse shoe effect in terms of the current settlement boundary. The arguments presented against this site being developed in the previous plan are still pertinent. There is still a lack of services, public transport and employment and it is not identified as a principal settlement in TAYplan. It would therefore be inappropriate to allocate this area as a housing site. Nonetheless, in terms of the landscape impact, the new development to the north of the site changes the landscape character of this area. With this visual change, it is difficult to argue that further small scale development in this locale would have as significant an impact as previously stated. There is, however, a number of areas already within the settlement boundary that are available for development currently and it would be preferable to see these areas delivered before any further small infills were made possible.

No modification is proposed to the Plan.

Landward sites:

Abernyte

New site proposal

P Keir Doe (0598/10/001): There is a new site proposed at Abernyte along with the suggestion that the area has a settlement boundary to support new growth in the location. The principal of establishing new settlement boundaries is dealt with in the 01E: Policy 6 Settlement Boundaries Schedule 4. It is considered that using Policy 19: Housing in the Countryside to assess applications for development in small settlements is more appropriate and will allow proposals to first and foremost be assessed against their suitability and fit within, and their impact upon, an existing building group rather than being almost deemed acceptable in principle because the proposal is within a settlement boundary line. The site was proposed at the Call for Sites stage and site assessed as part of the SEA process: Site Reference H274 (CD074, p.75-83). The site proposal is not located near an identified settlement boundary and therefore would be inappropriate as an allocation. Any proposal would therefore be assessed under the Housing in the Countryside criteria. This policy is relatively restrictive to large new sites in order to preserve the rural setting and prevent unplanned demands on infrastructure. It would therefore be for the applicant to demonstrate how this site met with the policy criteria. Furthermore, TAYplan sets the strategic framework for the Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth HMA. This site and proposed settlement boundary is not in the Perth Core Area. TAYplan also indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie.

No modification is proposed to the Plan.

Errol

New site proposal

Morris Leslie Group (0241/01/001): A new site has been proposed some distance from

Errol on an existing farm stead. This site has been assessed as part of the SEA process and referenced as H357. This is a landward site that does not have any connection to a settlement boundary although the nearest settlement boundary is at Errol. The representation refers to an earlier planning application that was withdrawn (Ref: 17/01941/FLL). A planning application (18/00243/FLL) has just been approved by the Local Review Body for a change of use of agricultural buildings to industrial (class 5) and storage/distribution units (class 6) and the formation of parking (CD369). An allocation for this site is therefore unnecessary. Furthermore, TAYplan sets the strategic framework for the Plan and identifies the Perth Core Area as being the location for the majority of development in the Perth HMA. This site is not in the Perth Core Area. TAYplan also indicates that there is a presumption against allocating development land releases in areas surrounding the Perth Core Area, including the Carse of Gowrie.

No modification is proposed to the Plan.

Reporter's conclusions:
Reporter's recommendations: