

Issue 32	Greater Dundee Housing Market Area	
Development plan reference:	Inchtute p.209-210 Invergowrie p. 211-212 Longforgan p. 235	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
James Hutton Institute (0030) Tayside & Central Scotland Transport Partnership (TACTRAN) (0057) Muir Homes (0214) Perth & Kinross Heritage Trust (0272) Scottish Natural Heritage (SNH) (0353) Hadden Group Ltd (0418/03)		IPL Limited (0437) Royal Society for the Protection of Birds (RSPB) (0546) Historic Environment Scotland (HES) (0580) GC Taylor (Farms) Ltd (0628) A&J Stephen Limited (0622)
Provision of the development plan to which the issue relates:	Development sites in Inchtute, Invergowrie & Longforgan	
Planning authority's summary of the representation(s):		
<p>Inchtute</p> <p><u>Housing Allocation Site H24</u></p> <p>Perth & Kinross Heritage Trust (0272/01/007): Recommended that the Site Specific Developer Requirements are updated to reflect the likelihood of an archaeological investigation and/or protection of Scheduled Monuments being required.</p> <p>Muir Homes (0214/01/001): Objects to Housing Allocation H24. In LDP1, the site was allocated for 16 units and the Reporter considered that even a modest increase could not be accommodated without "unacceptable loss of amenity". LDP2 now proposes a density range of between 52 and 80 units which the respondent considers the site could not accommodate. Other issues cited include: noise, amenity/loss of trees and traffic. Muir Homes propose an alternative site at Orchard Way which they consider would be a logical extension to the village with no policy conflicts.</p> <p>Hadden Group Ltd (0418/03/001): Supports Housing Allocation H24. They state the following reasons for this response:</p> <ul style="list-style-type: none"> • The viability of the Moncur Road site H24 is achievable for Hadden, and therefore the Planning Authority should support this vision as part of its overall development plan for the area and support inclusion of Site H24 in the Proposed Plan. • Scottish Planning Policy (SPP) Para 40 (CD004) persuades Planning Authorities to direct the right development to the right place. For Site H24, a planned extension to Inchtute, (i.e. site allocated within the adopted LDP), the proposal for H24 is an appropriate density for several reasons, compliant with the Government's advice to "using land within or adjacent to settlements for a mix of uses. This will also support 		

the creation of more compact, higher density, accessible and more vibrant cores" - the scale of development is appropriate, it will help deliver and is more resource efficient, turning marginal agricultural land into modern homes in a desirable place where people want to live, in line with para 45 of SPP (CD004).

- Therefore, identification of the Moncur Road (H24) housing site proposal within the Proposed Plan is supported by Hadden because it will be fully in line with the Scottish Government's delivery aspirations and will satisfy the vision for a modern flexible future planning system.

The respondent has also included supporting information relating to a live planning application reference 17/02159/FLM (RD021).

IPL Limited (0437/01/001): Objects to site capacity at H24 and suggests a reduction in the indicative number of units from 52-80 down to 16 (adopted LDP capacity). Their reasons for this are:

- The respondent operates the potato facility to the east of the site and has objected to recent planning applications for the H24 site (17/02159/FLM and 17/00943/FLM). The IPL site is a long established operation and is a recognised employment site within the Local Development Plan (LDP), with an allocation under adopted policy EDI. The facility deals with the grading and packaging of potatoes and operates both within the building and the outside areas. They acknowledge that the H24 site has been allocated for housing for some time however IPL has an interest in ensuring that the site is developed appropriately and in a considered manner, respecting the existing land uses in the area. In essence IPL wish to ensure that the development of the site is not undertaken in such a way that there will be amenity problems further down the line.
- The adopted Local Development Plan notes an indicative capacity for the site of 16 units whereas the Proposed LDP indicates 52-80 units. This is a significant increase and it is IPL's position that this number of units on the site is inappropriate and too dense to allow for the sufficient noise mitigation and design layout required due to the location of the A90 to the west and the IPL factory to the east. The proposed increase in housing numbers and density will result in a scheme, as evidenced through the recent planning applications, that does not adequately address residential amenity.
- In the previous Examination into the now adopted LDP, the proposal of an increased number of units was debated. The Planning Authority responded to the request by the landowner to increase the number of units above 16 by saying: "Inchture lies in the Carse of Gowrie where TAYplan limits development opportunities. The village has expanded considerably and the settlement boundary has been drawn to accommodate only limited further expansion during this Plan period. The proposal for one small site of 16 units best meets these requirements. Given the level of expansion proposed in the village and the constraint on the school capacity, a significantly larger number of units would not be considered appropriate. The number of units at the site is limited by noise issues from the adjacent A90 and the site's relationship to employment land to the north east." The Planning Authority concluded that "No modification is proposed to the Plan" (CD015, p.517).
- Having considered the site and the proposal to increase the number of units the Reporter concluded that "Site H24, of approximately of 3.6 hectares, is located within the established boundary of the settlement of Inchture. It has been identified for 16 houses to be built out on two hectares. The additional traffic generated is not

sufficient reason for its deletion from the Proposed Plan and the other concerns raised can be addressed by way of the site-specific developer requirements associated with its allocation. A development of this size can be accommodated and supported adequately within the settlement. However, an increase in the number of houses could not be accommodated without unacceptable loss of amenity." As such the level of housing indicated remained at 16 in the adopted LDP (CD014, p.529-530).

- It is now unclear as to why the Council are now taking a different view and increasing the number of units by up to 500%. As has been seen through the submitted planning applications, there are significant impacts on amenity through the density of housing being proposed which the Reporter into the Examination highlighted would happen. As such IPL urge the Council to review their proposal to increase the number of units permissible given the significant loss of residential amenity that will be experienced due to the increase in density.
- It is noted and welcomed that the Proposed LDP sets out specific developer requirements for the site but it is argued that these are at odds with the number of units indicated. A smaller, less dense housing development along the lines of the 16 units in the adopted Plan with the appropriate mitigation and layout could be achieved and would be more appropriate.

Site proposal H197

Muir Homes (0214/02/001): Housing Site Ref: H197 should be an alternative to H24 resulting in H197 either being removed from the Local Development Plan or reverting a capacity of 16 units. Muir Homes consider the site at Orchard Way to be a better site for Inchtute. This alternative site extends to some 3.4 hectares. It is of note that H197 already incorporates strategic tree planting undertaken by Muir Homes. This planting, together with the developer requirement to extend the woodland belt to form a new natural settlement edge will reduce the developable area considerably allowing a modest housing development to be comfortably accommodated within the proposed site. A site plan accompanies this submission. Appendix E 'Site Assessments' conducted in response to comments provided at the Main Issues Report stage did not highlight any particular planning issues with allocating the site Addendum to Environmental Report Appendix E - Perth Area Site Assessments (Settlements H-Z) (CD075 p.2-13). Other alternative options at Longforgan are considered to be too large and not natural extensions to the village. Longforgan is also considered to be too close to the Strategic Development Area known as the Dundee Western Gateway and as such any development could prejudice the delivery of the Western Gateway. The site adjacent to Orchard Way therefore represents a logical extension to the village of Inchtute and is of a size that can accommodate the limited requirements of Tayplan, unlike other options either in Inchtute or Longforgan.

GC Taylor (Farms) Ltd (0628/01/001): Housing Site Reference H197 should be a housing allocation. The settlement boundary is also requested to be extended to include this site. They consider this site appropriate for the following reasons:

- Infrastructure: There are no known infrastructure constraints that would prevent this site being brought forward for residential development.
- Physical: The site is free from any physical constraints that would prevent it from being developed for residential use.
- Contamination: The site is agricultural land and free from any known contamination.
- Deficit funding: No public funding is required to deliver this site for housing.

- Marketability: The site is under option to Muir Homes. This would form an extension to their existing successful adjacent development. This demonstrates a commitment from a housebuilder to deliver the units in the short to medium term. The market demand for this location has been proven by the strong demand and takes up of the adjacent existing development.
- Land use: It is considered that residential use would be the most appropriate use for this site. The use would complement the existing surrounding land uses.
- Ownership: The site is in the ownership of G C Taylor (Farms) Ltd and they intend to release the site for residential development. The site is under option to Muir Homes.

Invergowrie

Settlement statement

TACTRAN (0057/01/023): Notes the potential relocation of Invergowrie Railway Station to Dundee West is included in the Regional Transport Strategy Delivery Plan as Project R5.4 and will be subject to further appraisal work involving partners from Tactran, Perth & Kinross Council, Dundee City Council, Network Rail, ScotRail and Transport Scotland.

Site E37

James Hutton Institute (0030/01/01): Supports the enlargement the E37 development zone as well as continuing to support their current operations. This allows them greater flexibility to deliver the International Barley Hub (IBH) and the Advanced Plant Growth Centre (APGC) projects both of which are currently included within the Tay Cities Deal bid and cannot be contained completely within the footprint of the current built estate. Enlargement will also allow them to continue their support for the Tayside food and drink and agri-tech sectors by attracting spin-in companies such as Intelligent Growth Solutions (IGS) who are currently developing Scotland's first vertical farm on the Invergowrie site.

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. It is recommended that Site Specific Developer Requirements should reflect the outcome of the Habitats Regulations Appraisal (Table 8.1, pages 160-161) (CD056, p.529-530).

SNH (0353/01/029): Considers the need to add the developer requirement: "Provide new native woodland landscape edge at the western boundary." They state that any development of this scale can generate adverse landscape impacts unless it is led by a masterplan that draws on the landscape context to make the most of this site's assets (e.g. vistas to the Tay). The scale and design of development should sensitively reflect the rural character of the adjacent open landscape. This will help to contain the urban expansion area towards the open fields at the western boundary and provide a transition from urban to rural.

Perth & Kinross Heritage Trust (0272/01/008) and HES (0580/01/005): Recommend that the Site Specific Developer Requirements are updated to reflect the likelihood of an archaeological investigation and/or protection of Scheduled Monuments being required.

RSPB (0546/01/021): Would like to see the following changes:

- Add 'including maintenance and enhancement of open ground for breeding and wintering waders' to the last listed developer requirement ('Enhancement of

biodiversity and protection of habitats'). The areas of open ground on site are likely to support some breeding and wintering waders (the latter will be linked to the Firth of Tay SPA assemblage). RSPB Scotland does not hold detailed information on bird use of the site, although curlew, redshank and oystercatcher have been recorded. But any planning application should be supported by an ornithological survey of the site to determine the key areas used by waders. It is important that the layout and design of the development allows these open habitats to be maintained and enhanced. Adding this requirement would help the council fulfil its statutory duty to further the conservation of biodiversity and contribute towards achieving the Plan's vision and objectives as set out in section 3.3 (A Natural, Resilient Place).

- Add a further developer requirement: "Ensure that measures are put in place to prevent increased pollution to the Tay Estuary and intertidal habitats". The second addition would help to ensure that the council does not permit development that would adversely affect the integrity of the Firth and Tay and Eden Estuary Special Area of Conservation and Special Protection Area, which would be contrary to the requirements of the Habitats Regulations.

Longforgan

A&J Stephen Limited (0622/01/009): Suggest site at Rosemundie Pilcher Drive, previous Proposed Plan site H25 as shown on attached extract, to be included within the LDP for 15 - 20 houses, including a proportionate level of affordable housing, within the first plan period, in line with the identified TAYplan 2017 strategic housing requirement for the Perth & Kinross part of the Greater Dundee Housing Market Area (GDHMA). This is for the following reasons:

- Longforgan lies within the Perth & Kinross part of the Greater Dundee Housing Market Area and the approved TAYplan 2017 now recognises that there has to be some context for settlement growth rather than a veto due to the Western Gateway.
- The Proposed LDP2 recognises the requirement to allocate sufficient land to accommodate the TAYplan requirement within these settlements although identifies only one allocation, H24 Moncur Road, Inchtute.
- Inchtute has been the subject of a very substantial level of house building in recent years, with 249 houses recently completed at Mains of Inchtute. The proposed LDP2, H24 Moncur Road allocation for a further 52 - 80 units, in preference to an allocation at Longforgan, does not therefore conform with SPP which requires that LDP's should allocate a range and choice of sites within a single market area.
- By allocating further housing land within Inchtute, in preference to Longforgan, the Proposed LDP does not therefore provide for the required range and choice. A current application for planning permission (17/02159/FLM) for site H24, seeks consent for 66 units.
- The location is consistent with previous Council decisions on appropriate housing sites and the scale is consistent with the anticipated need in the Greater Dundee Housing Market Area.
- As stated, the site was allocated within the previously Proposed Local Development Plan as H25 South Longforgan and, along with H26, both sites were considered capable of delivering 75 houses as the only housing allocations in the settlement (CD053). Through Examination, the Reporter considered that this level of development would prejudice the delivery of the Dundee Western Gateway and deleted the sites from the Plan. The Reporter however considered that H25, should it be required in the future, remained an appropriate site for development (CD015).

- It is material to note that after site bids and full consideration of the alternative options for development, the previous Plan's Main Issues Report was presented to Council on 18th November 2015 with key recommendations for inclusion of issues and recommended sites within the consultation version of the MIR (CD046).
- At Council, an amendment was however proposed by Councillor Roberts and Paver to delete the officer's preferred site at Rosamunde Pilcher Drive and replace it with land to the west of the village adjacent to Janet Forbes Avenue (RD022).
- It therefore seems perverse that now that there is an identified TAYplan housing requirement within the Perth & Kinross part of the GDMA, the consistently preferred and deliverable site which is akin to an infill site has not been included within the Proposed Plan as a housing allocation.
- The site at Rosamunde Pilcher Drive directly abuts the southern edge of Longforgan and the proposed use is compatible with neighbouring uses which wrap around the proposed site on three sides making it much more of an infill proposal than a settlement extension.
- As stated above, the existing character of the area is urban and the proposal will be akin to an infill development taking into account the local setting.
- Vehicular access will be facilitated from a point of entry off Rosamunde Pilcher Drive, i.e. a current residential street. The site is well contained visually by existing development and appropriate boundary treatment and linkages to the green network will be masterplanned through any allocation 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.
- There are no physical or technical constraints to development; the site is in a marketable location; the site is controlled by a single local developer with intent to progress subject to planning permission; and if allocated there will be no other competing housing allocations within Longforgan.
- It therefore makes good planning sense to allocate a site which relates to the settlement both in proximity and form, has a history of favourable consideration through the previous Proposed Plan, is at a scale appropriate to emerging TAYplan requirements and of course, is not constrained and is deliverable.

Modifications sought by those submitting representations:

Inchtire

Perth & Kinross Heritage Trust (0272/01/007): Site Specific Developer Requirements are updated to reflect the likelihood of an archaeological investigation and/or protection of Scheduled Monuments being required.

Muir Homes (0214/01/001): Remove housing site H24 from the Plan and allocate H197 as a housing site. Alternatively, reduce the density for housing site H24 back to 16 units.

IPL Limited (0437/01/001): Housing density for Housing Allocation H24 to be reduced back to 16 units.

Muir Homes (0214/02/002) and GC Taylor (Farms) Ltd (0628/01/001): Site Proposal Reference H197 at Inchtire for a housing allocation. The settlement boundary is also requested to be extended to include this site.

Invergowrie

SNH (0353/04/001): Due to the Site Specific Developer Requirements for E37 only seeking the generic 'Enhancement of biodiversity and protection of habitats' it is recommended that the following additional requirement is added to the list (page 212) to avoid adverse impacts on the Firth of Tay and Eden Estuary SAC:

- 'Development proposals should not result in adverse effects, either individually or in combination, on the integrity of a European designated site(s).'

SNH (0353/01/029): Add the developer requirement for E3: "Provide new native woodland landscape edge at the western boundary."

Perth & Kinross Heritage Trust (0272/01/008) and HES (0580/01/005) both recommend that the Site Specific Developer Requirements are updated to reflect the likelihood of an archaeological investigation and/or protection of Scheduled Monuments being required.

RSPB (0546/01/021) would like to see the following changes:

- Add 'including maintenance and enhancement of open ground for breeding and wintering waders' to the last listed developer requirement ('Enhancement of biodiversity and protection of habitats').
- Add a further developer requirement: "Ensure that measures are put in place to prevent increased pollution to the Tay Estuary and intertidal habitats".

Longforgan

A&J Stephen Limited (0622/01/009): Site (Reference H199) at Rosemunde Pilcher Drive, previous Proposed Plan site H25, to be included within the LDP for 15 - 20 houses.

Summary of responses (including reasons) by planning authority:

Inchtute

Housing Allocation Site H24

Perth & Kinross Heritage Trust (0272/01/007): It has been suggested that the Site Specific Developer Requirements for this site should be updated to reflect the likelihood of an archaeological investigation and/or protection of Scheduled Monuments being required. Although there is not a site specific requirement, every planning application is assessed against the policies in the Plan. Policy 26: Scheduled Monuments and Non-Designated Archaeology in the Proposed Plan would therefore be applied to this site as part of the planning application process. The Scheduled Monument is located in an area of open grassland on the opposite side of the road. The development of this site is unlikely to have any noticeable impact on the setting of the monument as there has already been a considerable amount of new housing that has already changed the character of this area. There is a site requirement to ensure that the stone wall along the road facing the monument will be retained or reused. This aims to ensure the visual impact will be minimised.

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. The Council would suggest the following requirement is added: "Evaluation of archaeological potential and mitigation on site will be required and protection of the setting of nearby Schedule Monument should be ensured."

Muir Homes (0214/01/001); IPL Ltd (0437/01/001): There are two objections to H24 in terms of the site capacity. H24 is currently allocated in the adopted LDP for 16 units. The site was originally proposed for the Perth Area Local Plan in 2005 (CD263, p.114-115). When this Plan was abandoned to begin a Local Development Plan for Perth & Kinross Council under the Planning etc. (Scotland) Act 2006 (CD036), a further proposal to include this site was submitted in June 2009 (CD264, Inchtute_02_385). This proposal suggested a density of 13 units on the site. The site was then allocated for 16 units in the LDP1: Proposed Plan (CD053, p.122-123). The site was assessed at Examination and the Reporter stated the following: "The additional traffic generated is not sufficient reason for its deletion from the Proposed Plan and the other concerns raised can be addressed by way of the site-specific developer requirements associated with its allocation. A development of this size can be accommodated and supported adequately within the settlement. However, an increase in the number of houses could not be accommodated without unacceptable loss of amenity." (CD015, pp. 530).

The LDP2: Proposed Plan now suggests an increase in density and has proposed a site capacity of 52-80 units. A reason for the change in density at H24 was partly due to a revision of all site capacities in LDP2. This was undertaken in response to the Housing Supply Targets identified for Perth & Kinross Council through TAYplan (2016-36) (CD022). Inchtute, Longforgan and Invergowrie are all located within the Greater Dundee Housing Market Area. The Greater Dundee Housing Market Area covers the whole of the Dundee City Council area plus small parts of Perth & Kinross, Angus and Fife Council areas. TAYplan (2012-32) did not identify a shortfall when the site was originally adopted (CD023). Furthermore, there was a presumption against development in the Carse area as it was considered to compete with Dundee's Western Gateway expansion and the regeneration of Core Areas. TAYplan (2016-36) now identifies a shortfall of 39 units in the Perth & Kinross section of the Greater Dundee HMA (CD022) – this includes the 16 units currently allocated to the site in the Adopted LDP. Whilst there is still a presumption against development in the Carse, this shortfall requires to be met and is small in scale, so it neither competes with the regeneration of Core Areas or the delivery of Strategic Development Areas. The Main Issues Report consulted on two options to address a shortfall arising in this area: an additional site in either Inchtute or Longforgan (CD046, p.50-52). As part of the review, the site capacity range methodology was applied to the site. A Housing Background Paper on this methodology provides further detail on this process (CD018). As the density pattern in Inchtute is generally medium to high, the capacity of this site was significantly raised.

A further reason for the change in density was triggered by pre-application discussions regarding the site with Hadden Group. The market has changed within the area and it is now recognised that smaller houses at a higher density would make the site considerably more viable. In addition this reflects current market trends towards smaller houses at the lower end of the marked serving the first time buyer and elderly downsizing demand, and this is welcomed by the Council. Through this discussion, it was acknowledged by the Council that a site of this size could therefore accommodate more than the 16 units originally allocated. A PAN was undertaken on the site (17/00003/PAN) to reflect the raise in density to that of a major planning application. Following this, two planning applications have been received. The first was validated in May 2017 (17/00943/FLM) for 74 units. This

was later withdrawn and a further application was made in December 2017 for 66 units (17/02159/FLM). However, on 15th March 2018, two weeks after the end of the Proposed Plan consultation, the planning application was refused, specifically on grounds raised by the Council's Environmental Health team in terms of noise attenuation from the adjacent agricultural processing plant (CD265, 17/02159/FLM Development Management Report). This is currently being appealed (Reference: PPA-340-2117) and the outcome of this appeal could further assist in determining the capacity of this site. As part of the preparation for the Appeal, a Noise Consultant has been employed by the Council to determine the extent of the developable area for this site. Following the advice given, it is acknowledged that the site capacity range may need to be reduced significantly due to these findings.

No modification is proposed to the Plan. However, if the Reporter is minded to accept the modification to reduce the site capacity due to the Appeal decision then it might trigger a shortfall in the Greater Dundee HMA. If there is a shortfall of housing land supply in the Greater Dundee HMA, then that shortfall is met by allocating the site H199 at Longforgan as a potential alternative (see further discussion regarding this in the Longforgan section).

Site proposal H197

Muir Homes (0214/02/002); GC Taylor (Farms) Ltd (0628/01/001): An alternative site is proposed at Inchtute referenced as H197. This site is located adjacent to the settlement boundary on low lying land typical of the area. It is a continuation of the recent Muir Homes development and extends out into flat agricultural land. This site was proposed during the Call for Sites stage of the Plan. A full site assessment was undertaken to identify any key constraints regarding the site (CD075). The Main Issues Report consulted on two options to address a shortfall arising in the Greater Dundee HMA: an additional site in either Inchtute or Longforgan (CD046, p. 50-52). In the MIR, the site, known as Mains of Inchtute, was far smaller than the one originally submitted or the site now proposed. The MIR stated that only the westernmost part of the site, immediately adjacent to the existing housing, could be considered as an alternative option to the site proposed at Longforgan. During the MIR consultation, there were a number of representations against this site with concerns about Inchtute. These included: the over development of Inchtute, concerns about school capacity, flooding, loss of biodiversity, increased traffic and landscape impact (CD141, MIR Responses, p.51-53). Furthermore, with a raised density on the allocated H24 site being identified through a review of site capacities (CD018, p.34) as well as a planning application for 66 units (17/02159/FLM), this option was not taken forward to the Proposed Plan stage.

It is notable that the site now proposed is a small section of a much larger field with very little containment. The strategic planting that the respondents refer to is limited and does not currently create an effective settlement edge. The site proposed does not lend itself to a new natural settlement boundary and would require considerable amounts of new planting to reduce the visual impact of housing. The site is also located within Prime Agricultural Land which is currently being farmed. By comparison, the H24 site is well enclosed by stone walls and mature trees and is located within the settlement boundary. Whilst it is acknowledged that the site assessment for H197 did not highlight any significant environmental issues to prevent development, it was identified that the site would require significant landscaping and tree planting to screen the development and minimise the visual impact from the south-eastern border. The respondents also state that the site could better accommodate a modest number of housing than H24. An argument in favour of H24, however, would be that the site can only accommodate a modest number

of houses as the site is far more contained than the alternative H197 site proposed. In terms of marketability, H24 already has had a planning application for 66 units.

Nonetheless, if the Appeal which is currently underway for the H24 site determines a reduced capacity, there may be a shortfall in the housing numbers in the Greater Dundee HMA. The Council, however, do not consider this site to be the solution to this housing numbers issue. Although this site has been through the consultation process of this LDP, the Council consider this site would not be appropriate for a small allocation as it is part of a much larger area and lacks containment. The small strip that was proposed in the MIR would not provide any other benefit than meeting the required housing numbers for this area. Furthermore, allocating this small area could potentially sterilise a far longer term strategy for Inchtute. In contrast, the potential site at Longforgan (which is discussed below) could bring potential gain to the community in terms of supporting a school expansion and a recreational area. Although the Longforgan site has not been consulted upon in this Plan period, the site is far more preferable in terms of its location within the village and its containment.

No modification is proposed to the Plan.

Invergowrie

Site E37

SNH (0353/04/001): With specific reference to the outcomes of the Habitats Regulations Appraisal, it is considered that amending the Site Specific Developer Requirements to incorporate mitigation measures as set out in Table 8.1 of the Appropriate Assessment (CD056) would ensure the Plan meets the requirements of the Habitats Directive in respect of future development at Site E37 and any likely significant effects on the integrity of the Firth of Tay and Eden Estuary SAC as a result.

If the Reporter is so minded, the suggested additional text by the respondent should be added to the Site Specific Developer Requirements:

- Development proposals should not result in adverse effects, either individually or in combination, on the integrity of a European designated site(s).

Perth & Kinross Heritage Trust (0272/01/008); SNH (0353/01/029); RSPB (0546/01/021); HES (0580/01/005): A number of other updates have been suggested to the Site Specific Developer Requirements for this site, covering native woodland, the River Tay catchment, biodiversity and archaeology. Although these issues are not specified in the requirements, every planning application is assessed against the policies in the Plan. In this case, Policies 38: Forestry, Woodland and Trees, Policy 39: Biodiversity, Policy 45: River Tay Catchment and Policy 26: Scheduled Monuments and Non-Designated Archaeology all provide protection and would be highlighted through the planning application process. The Council therefore does not consider it necessary to repeat all these requirements as they are already protected through the LDP policies.

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.

The Council would suggest the following Site Specific Developer Requirements are added:

- Provide new native woodland landscape edge at the western boundary.
- Evaluation of archaeological potential and mitigation on site will be required and protection of the setting of nearby Schedule Monument should be ensured.

Longforgran

A&J Stephen Limited (0622/01/009): A site has been proposed for inclusion at Longforgran as an alternative to H24 at Inchtute. This site was in the LDP1: Proposed Plan as H25 (identified as H199 for the purposes of this Plan) and was met with a number of objections through the consultation of the plan (CD015, p.564-567). At Examination, the Reporter recommended that H25 could not “form an essential component of the settlement strategy of this local development plan” as the site was located in a non-tiered settlement and could prejudice the successful delivery of the Dundee Western Gateway (CD015, p.571). The site was therefore deleted from the Plan.

The Housing Supply Targets for Perth & Kinross Council through TAYplan (2016-36) now identifies a shortfall of 39 units in the Perth & Kinross section of the Greater Dundee HMA (CD022). Inchtute, Longforgran and Invergowie are all located within the Greater Dundee Housing Market Area. The Greater Dundee Housing Market Area covers the whole of the Dundee City Council area plus small parts of Perth & Kinross, Angus and Fife Council areas. TAYplan (2012-32) did not identify a shortfall when the site was originally proposed (CD023). Furthermore, there was a presumption against development in the Carse area as it was considered to compete with Dundee’s Western Gateway expansion and the regeneration of Core Areas. Whilst there is still a presumption against development in the Carse in TAYplan (2016-36), this shortfall requires to be met and is small in scale, so it neither competes with the regeneration of Core Areas or the delivery of Strategic Development Areas.

The site is located very centrally within the village, adjacent to the primary school. The school may require expansion in the near future – this has not yet been determined but the logical area for expansion would be within the school grounds. As this site is adjacent to the primary school, it would be preferable to see any additional playground requirements to be located within the proposed site. If development were to prevent this extension from being undertaken, there may be a requirement to move the school to an entirely new site to ensure it meets with current educational requirements. As the school is in a central location within the village, the preferred approach would be to retain its position.

In terms of site proposals that have been received during this and the previous LDP process for Longforgran, H199 is the most preferential in terms of location. There were no significant issues identified through the site assessment process (CD075, p.43-53). It is well contained and a logical extension to the settlement boundary. It is prime agricultural land currently used as grazing ground, but it is adjacent to residential properties and the school. It is accessible from Rosamunde Pilcher Drive and is more closely related to an infill site than an expansion to the village. There is a lack of centrally located recreational space in Longforgran at present. This site could also provide an opportunity to meet this need whilst still allowing for small scale development.

The reasons this site was taken out of the previous Proposed Plan by the Reporter are no longer as pertinent. The site is much smaller than the original allocation in LDP1. There was no shortfall at that time in the Greater Dundee HMA. Furthermore, the site was not

taken out due to site specific objections, but rather because it was seen as competing with Dundee's Western Gateway. Nonetheless, it must be noted that this site was not identified at an earlier stage within this plan process and has not had the benefit of stakeholder engagement or public consultation.

No modification is proposed to the Plan. However, if, in the event of a shortfall in housing land supply in the area, the Reporter is minded to accept the modification to allocate the site at Longforgan (reference H199), the Council would be comfortable with making this change if the overall housing numbers for the Greater Dundee HMA were met.

Site Specific Developer Requirements should include:

- A community engagement exercise to establish the design of the site.
- Requirement for improvements to community, educational and play facilities within village.
- Ensure built form and layout respond appropriately to the Conservation Area and its landscape setting.
- A Transport Assessment.
- Improvements to core paths within the site and connections into the village centre and wider core path network.
- Enhancement to habitats for biodiversity.

Reporter's conclusions:

Reporter's recommendations: