

T: 0131-244 8249
E: jane.tennant@gov.scot

Please email:

Our ref: A13693242

11 March 2016

Dear Development Plans Team

PERTH AND KINROSS LOCAL DEVELOPMENT PLAN MAIN ISSUES REPORT

Thank you for providing the Scottish Government with the opportunity to comment on the above Main Issues Report (MIR). We wish to make the following comments:

QUESTION 1

The Town Centre First Principle jointly developed by Scottish Government and COSLA encourages the public sector to continue to invest in town centres and help communities thrive. The principle is about adopting an approach to decisions that considers the vibrancy of town centres as a starting point. It asks that the health of town centres features in decision making processes. It would be helpful if Figure 2: Adopted Local Development Plan Key Objectives could be amended to include additional text to demonstrate upfront commitment to a town centres first approach – it may be most appropriate to include this within the 'Place' objective/section.

QUESTION 7

We agree that it would be useful for policy PM4 to be renamed 'Settlement Envelopes' and reworded to enable development on the edge of settlements in specific limited circumstances.

Scottish Planning Policy and the National Planning Framework 3 set out a vision for vibrant rural areas with growing sustainable communities supported by new opportunities for employment and education. It is logical for the plan to be clear on its aspirations for settlements in rural areas and to apply flexibility in certain circumstances to allow for development outwith settlement boundaries, particularly where these can be demonstrated to support fragile and remote communities. In taking forward this policy you should consider links with the SPP policy of presumption in favour of development that contributes to sustainable development which could also be applicable with developments adjacent to or outwith settlement boundaries.

QUESTION 8

We are supportive of the approach proposed. In identifying an adequate amount and range of employment land paragraph 96 of the SPP states that development plans should support opportunities for integrating efficient energy and waste innovations within business environments. This should be considered in taking proposals forward. We note and support the provision proposed in relation to Binn eco park but recommend that the integration of such infrastructure should be considered across the Tay Eco-Valley and throughout Perth

and Kinross as appropriate.

We note that paragraph 3.4.6 of the MIR states there is an adequate range and amount of employment land. In relation to paragraph 101 of the SPP it is important to confirm that employment land is serviced or serviceable within 5 years.

We support the key demonstrator highlighted in paragraph 3.4.5 of the MIR re a Low Carbon Transport Network (Perth City), providing multifuels distribution facility and promoting green transport. This accords with paragraph 275 of the SPP which states that development plans should support the provision of infrastructure necessary to support positive changes in transport technologies, such as charging points for electric vehicles. It is important however that provision for such infrastructure is considered across the development plan area and not just in the Tay Eco-Valley. The Council may also wish to consider its parking standards to include provision for low carbon options.

It is not clear from the plan whether any existing business sites are underused. Paragraph 103 of the SPP states that new sites should be identified where existing sites no longer meet current needs and market expectations. Where existing business sites are underused, for example where there has been an increase in vacancy rates, reallocation to enable a wider range of viable business or alternative uses should be considered, taking careful account of the potential impacts on existing businesses on the site. This should be reflected in the proposed plan, as appropriate.

In addition, paragraph 104 of the SPP states that local development plans should locate development which generates significant freight movements, such as manufacturing, processing, distribution and warehousing, on sites accessible to suitable railheads or harbours or the strategic road network. This should therefore be considered when taking forward the Proposed Plan as part of the Tay Eco-Valley proposals and wider proposals in the Perth and Kinross area.

QUESTION 9

We agree with the requirement for greenbelts to have robust boundaries. We acknowledge the approach being taken amending greenbelt boundaries to reflect components of the proposals for the major expansions of settlements as part of the planned broader spatial strategy defined by the SDP and LDP.

QUESTION 11

We are generally supportive of the preferred approach, but there was a lack of explanation within the MIR as to why a heat strategy cannot be accommodated within the LDP itself and why supplementary guidance is the appropriate means for such detail. SPP defines the parameters for district heating and how LDPs are expected to take this forward. The Council should therefore satisfy itself that it can comply with these requirements within Supplementary Guidance.

The Scottish Government has recently published online planning advice on planning and heat and the Council may want to refer to this in progressing a heat strategy and policy for the area. <http://www.gov.scot/Resource/0048/00487284.pdf>

Policy 7 within the proposed TAYplan SDP states:

“A. Local Development Plans should identify areas that are suitable for different forms of energy, waste and resource management infrastructure and policy to support this. This can include, where appropriate, locations of existing heat producers (e.g. waste management or

industrial processing), renewable sources of heat and electricity, and existing waste management facilities to ensure the co-location/proximity of surplus heat producers and heat users.”

The proposed SDP also contains a spatial framework at Map 7a which starts the process of defining opportunities for district heat networks and it is expected this would be further refined within the LDP and if required additional detail provided by Supplementary Guidance.

QUESTION 16

The approach to expanding Binn Eco Park to promote and showcase best practices in resource management, renewable energy systems and circular economy innovation, is in principle in keeping with SPP paragraph 180. The inclusion of the issue in the main issue report is supported and we would agree that a detailed master plan is required prior to application stage. The proposals accord with paragraph 96 of the SPP that development plans should support opportunities for integrating efficient energy and waste innovations within business environments.

On waste generally we note that the approach by the Council to pro-actively plan and identify new locations for new waste management infrastructure is supported by SPP paragraph 186.

We note from the Appendix 1– policy analysis that the Council intends to retain policy EP9 on waste management infrastructure with some minor changes to reflect Tayplan. We would support these updates, however we would also add that Paragraph 181 of SPP states that planning authorities should have regard to the annual update of required capacity for source segregated and unsorted waste. The Scottish Government waste guidance recommends that infrastructure capacity tables should be described in the MIR, so that stakeholders can participate effectively in the context of ZWP policies. This could be addressed in the proposed plan.

ADDITIONAL COMMENTS

Main Issue 1 - Housing:

We note the Housing Supply Targets (HST) and Housing Land Requirement (HLR) provided in the MIR reflects the Proposed TayPlan (SDP2) figures for housing in Perth and Kinross. In taking forward the Proposed Plan, you should refer to Table 3 of the recently published Draft Planning Delivery Advice: Housing and Infrastructure which provides guidance on how the key aspects of housing figures should be presented in Local Development Plans (within city regions). See: www.gov.scot/Topics/Built-Environment/planning/Roles/Scottish-Government/Guidance/Other-Publications/Housing-Infrastructure.

With regards to generosity, the MIR provides background to why this was not considered appropriate or included for Perth and Kinross at the SDP2 level. Given that SDP2 will be subject to examination in the future, we note that Table 3 provides an adjusted HLR with a 10% generosity allowance, if required by the Reporter.

You highlight that the affordable housing requirement is informed by the SDP2 approach to apply a 75:25 market to affordable split and that further consideration will be given to this matter in taking the plan forward.

The emphasis on delivery of housing is welcomed. We note the proposed inclusion of a specific policy (RD7) and supplementary guidance to support this.

We note the statement in paragraph 3.2.14 of MIR which highlights that LDP2 will need to identify additional sites in any HMA where there is a shortfall between the HLR and existing land supply. When updating your relevant housing policies you may wish to consider the Draft Planning Delivery Advice on Housing and Infrastructure which provides advice on this matter. In particular paragraph 26 states that “Planning authorities may wish to consider including a ‘flexibility policy’ in development plans to set out how individual proposals will be considered where a shortfall in the 5 year supply of effective housing land supply emerges – as evidenced by the Housing Land Audit. Such a policy can provide criteria for considering proposals for housing on land which is not allocated in the development plan. It may also include support for sites that are identified for the longer term but which could be delivered earlier and address infrastructure constraints”.

No consideration appears to have been given to the need for specialist housing provision and in particular the needs of Gypsy/Travellers and Travelling Showpeople. Need should have been considered through the SDP2 HNDA process and, where applicable, the LDP should set out clearly what need there is in the area if any and what action is being taken to address this need.

Town Centres First:

Appendix 1 Policy Analysis indicates that for Policy RC4 – Retail and Commercial Leisure Proposals, no Change is required. Currently, this is the policy that sets out a sequential town centre first approach, and is focussed on Retail and Commercial Leisure.

We would highlight that since LDP1 was adopted in Feb 2014, the town centre first approach has been broadened out in SPP (June 2014) to also apply to offices, community and cultural facilities and uses which attract significant numbers of people. One of SPP’s Policy Principles (paragraph 60) is that “the planning system should apply a town centre first policy when planning for uses which attract significant numbers of people, including retail and commercial leisure, offices, community and cultural facilities”.

The Council may therefore wish to amend RC4 and rename it as a Town Centre First Policy and broaden out its scope, to ensure it puts in place a policy framework that supports the town centres first approach for the full range of uses set out in SPP.

Town Centre Living:

The National Review of Town Centres External Advisory Group Report (the Town Centres Review) identified town centre living as one its themes. It highlights “Footfall is key to achieving thriving, successful town centres. The best footfall is the residential kind, for people who live in a town centre will not only use its shops and institutions but will care for its safety and security in the evenings and at night.” In its response the Scottish Government’s Town Centre Action Plan includes Town Centre Living as a key strand which states the Scottish Government endorses the idea of encouraging more people to live in town centres. As set out in the Town Centre Toolkit “More housing in town centres supports local businesses and makes town centres more vibrant.” The revised SPP sets out national policy direction that the planning system should consider opportunities for promoting residential use within town centres where this fits with local need and demand. And similarly through the Scottish Government’s Local Housing Strategy Guidance, we are seeking to encourage local authorities to fully consider the role that town centres can play as residential communities. We would therefore encourage the Council to consider how it can promote opportunities for town centre living within the proposed plan, both in terms of supportive text and policy, and in identifying opportunity sites.

Main Issue 5 - Perth City Plan:

We are supportive of the provision made for active travel. This is supported by paragraph 273 of the SPP which states spatial strategies set out in plans should support development in locations that allow walkable access to local amenities and are also accessible by cycling and public transport. Plans should identify active travel networks and promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars. The proposals for Perth reflect this hierarchy but it is important to ensure that the same approach is taken, as appropriate, throughout Perth and Kinross.

Appendix 1:

We note that developer contributions are not included as a main issue and that Appendix 1 Policy Analysis indicates that The Council are intending to retain policy PM3 on developer contributions unchanged in the forthcoming LDP2.

We support the Council's approach to securing cumulative contributions through contribution zones, however we note that these are currently contained within supplementary guidance. We would encourage the Council to consider including these contribution zones in the forthcoming LDP itself rather than in supplementary guidance. This is supported by Circular 6/2013 which states that items for which financial or other contributions will be sought and the Circumstances (locations, types of development) where they will be sought should not be in supplementary guidance but rather should be in the plan itself.

Green Infrastructure:

Appendix 1 Policy Analysis indicates that for Policy NE4 Green Infrastructure changes will be made to ensure it complies with SPP in terms of allotments and temporary greening, which is welcomed. We would also request that this revision also encourages opportunities for a range of community growing spaces, to which SPP refers.

Policy EP1 – Climate Change, Carbon Reduction and Sustainable Construction:

The policy will need to be revised to reflect that the 2012 timing set out in the current plan has been passed and that revised building standards are now in place. The policy should be updated to retain progress on Section 3F of the Town and Country Planning (Scotland) Act 1997.

Policy ER4 – Minerals and Other Extractive Activities:

ER4A: Extraction:

No information has been provided that demonstrates the landbank of reserves for construction aggregates (required by paragraph 238 of Scottish Planning Policy) has been provided for. The monitoring statement notes the national policy position on the provision of minerals but does not suggest policy changes beyond refinement to ensure consistency with the national policy position as of 2014. Scottish Planning Policy 238 is clear that the landbank of construction minerals should be maintained through the identification of areas of search, or alternatively by using a criteria based approach where sufficient landbank exists or substantial unconstrained deposits are available.

The TAYPlan Proposed Plan (2015) is clear that the focus for development is on principal settlements but that locations for minerals extraction will be identified through local development plans. It is clear that TAYPlan policy 7 is important in identifying the approach to minerals.

The P&K MIR promotes a criteria based approach to minerals but this is not supported by evidence about the scale of the landbank or unconstrained deposits.

The approach may comply with national policy but requires further evidence to support the

position taken.

There is currently no consideration of coal reserves so it is unclear if Scottish Planning Policy paragraph 239 on surface coal mining should be applied.

Other policy areas not covered by the MIR or adopted development plan:

It will be important to consider the following provisions of the SPP in taking the MIR forward:

Economic development:

Paragraph 95 of the SPP states that development plans should encourage opportunities for home-working, live-work units, micro-businesses and community hubs. We would look for this to be reflected in the proposed plan.

Paragraph 100 of the SPP states that development plans should be informed by the Tourism Development Framework for Scotland in order to maximise the sustainable growth of regional and local visitor economies. Strategic development plans should identify and safeguard any nationally or regionally important locations for tourism or recreation development within their areas. Paragraph 105 of the SPP is clear that planning authorities should consider the potential to promote opportunities for tourism and recreation facilities in their development plans. This may include new developments or the enhancement of existing facilities. We note adopted development plan policy ED5 and its recommended discontinuance. It is not clear however whether ED5 protects the types of locations referred to in the SPP and informed by the Tourism Development Framework. On this basis we wonder whether the policy could be reconsidered to ensure its compliance with SPP, in line with the Tourism Development Framework. There are clearly important areas for tourism development in Perth and Kinross that may benefit from identification and policy protection and promotion.

Transport:

Paragraph 277 of the SPP states that disused railway lines with a reasonable prospect of being reused as rail, tram, bus rapid transit or active travel routes should be safeguarded in development plans. This may be relevant in Perth and Kinross.

Paragraph 4.5.4 makes reference to the pilgrim way and we note the reference to that part of the way that falls within Perth and Kinross at paragraph 4.4.5 from Crook of Devon to Kinross. We support the intention of identify and safeguard the route. It is not clear, however, that the spatial strategy responds to the NPF3 National Development 8 'National Long Distance Cycling and Walking Network'. Even where the route has been developed the emerging network is identified in paragraph 4.28 of National Planning Framework 3 as an important tourism asset and will act to link up key outdoor tourism locations across the country. Furthermore paragraph 5.14 of National Planning Framework 3 is clear that the exemplar walking and cycling friendly settlements to be identified by each local authority will act as key nodes on the national cycling and walking network. In identifying and protecting the route greater compliance with national policy could be achieved by addressing the national development and its purpose more directly. It is not clear for example to what degree the route will or could link outdoor tourism locations or whether exemplar settlements have or could be identified in Perth and Kinross and the pilgrim way aligned to their location?

Flooding:

We note that there are proposals to update the Council's Supplementary Guidance on Flood Risk and Flood Risk Assessments to reflect the new River Basin Management Plans and updated SPP.

The Council should consider any land use implications falling out from the Strategic Flood Risk Management Strategy and any subsequent local flood strategies relevant to the area. <http://apps.sepa.org.uk/FRMStrategies/tay.html>

Additionally the Council should note that Para 254 in SPP outlines that Climate Change will increase the risk of flooding in some parts of the country. Given the potential risk of flooding it would be prudent for the council to explore any potential implications climate change could have on the city and other settlements and to factor in climate change mitigation to those areas at highest risk of flooding.

Para 264 of SPP states that it is not possible to plan for development solely according to the calculated probability of flooding. However in applying the risk framework the effects of climate change including an allowance for “freeboard” should also be taken into account. The SPP glossary defines freeboard as - a height added to the predicted level of a flood to take account of the height of waves or turbulence and uncertainty in estimating the probability of flooding.

Whilst SPP doesn't stipulate the 20% recommended by SEPA for Freeboard allowance, it does seem to indicate that provision for climate change would be additional to the 1 in 200 scenario. It will be for the council to consider what might be appropriate for the P&K area to address this.

Wind energy:

We are concerned that the spatial framework for wind (Renewable Energy Supplementary Guidance) has not been published from the previous adopted plan. We note that the original intention (LDP examination report) was to publish in 2013. There is currently no supplementary guidance in place and the main issues report for the proposed new plan does not identify wind energy as a main issue.

We would encourage the Council to include, at least, a spatial framework for onshore wind farms and a supporting policy within the LDP. We consider there is the opportunity to include a wind energy spatial framework in the LDP rather than in supplementary guidance. This would be consistent with SPP, the proposed TAYplan SDP 2015 or the Guidance set out by SNH on Spatial Planning for Onshore Wind – Natural Heritage Considerations.

Policy 7 within the proposed TAYplan SDP states:

“A. Local Development Plans should identify areas that are suitable for different forms of energy, waste and resource management infrastructure and policy to support this. This can include, where appropriate, locations of existing heat producers (e.g. waste management or industrial processing), renewable sources of heat and electricity, and existing waste management facilities to ensure the co-location/proximity of surplus heat producers and heat users.”

The proposed SDP also contains a spatial framework at Map 7b which starts the process of defining a spatial framework and it is expected this would be further refined within the LDP.

National Marine Plan:

It should be noted note that in March 2015 Scottish Ministers adopted and published a statutory National Marine Plan for Scotland. The Plan applies from Mean High Water Springs and covers both Scottish inshore waters (out to 12 nautical miles) and offshore waters (12 to 200 nautical miles).

The National Marine Plan has statutory effect for any public authority taking decisions which can affect the marine environment. The National Marine Plan may therefore be of relevance to some decision making and development planning by Perth and Kinross Council given the coastal area within its plan area. There would therefore be benefit in recognising the National Marine Plan, and any subsequent regional marine plans, within a the Proposed Plan. Giving consideration to marine planning policy at the early stages of development planning also has the benefit of promoting alignment between marine and terrestrial policy in coastal areas.

Planning circular 1/2015 provides additional information on marine planning, its relationship with land use planning and opportunity for alignment.
<http://www.gov.scot/Resource/0047/00479384.pdf>

National Marine Plan
<http://www.gov.scot/Publications/2015/03/6517>

Further detail.

Relevant marine legislation (Marine (Scotland) Act 2010 and UK Marine and Coastal Access Act 2009) requires that

- public authorities taking authorisation or enforcement decisions that affect or might affect the marine area must do so in accordance with the National Marine Plan and any subsequent regional marine plan once adopted, unless relevant considerations indicate otherwise. This includes decisions on terrestrial planning applications and enforcement action which affect the UK marine area.
- public authorities when making decisions which are capable of affecting the marine area which are not authorisation or enforcement decisions, must have regard to National and regional marine plans. This applies to the preparation and adoption of terrestrial development plans.

Cont...

TRANSPORT SCOTLAND

We welcome the information provided and the acknowledgement of the major potential impact on the trunk road network at this stage in the plan process and look forward to future opportunities to engage with PKC and other key stakeholders to identify appropriate transport interventions to support the land use strategy.

Chapter 3 – Delivery of Housing Sites

Transport Scotland attended the discussion on the potential introduction of delivery strategies for larger, strategic sites and were encouraged by the dialogue between the council and the developers on the day. Where development is likely to impact on the strategic transport network, early discussion with Transport Scotland and the council is recommended and this should be highlighted to developers.

Chapter 3 – Perth West

This section makes reference to the proposed new A9 access to serve the Perth West development and states “...due to Transport Scotland junction spacing requirements...”. As per our comments to the Perth West Masterplanning exercise we request that any future reference of this type should replace Transport Scotland with “trunk road” or “DMRB” as the design requirements for the trunk road network are set out in Design Manual for Roads and Bridges (DMRB), which are national standards, so not a Transport Scotland specific request.

Chapter 3 – Perth City Plan

Any future reference to “*Scottish Government’s Strategic Transport Projects*” should be changed to “*Transport Scotland’s Strategic Transport Projects Review*”.

Table 5 – Transport Scotland should be involved in discussions on any actions taken forward through the City Action Plan which have the potential to impact the strategic transport network. Actions 1, 2, 3 and 4 have obvious links to the strategic network but others relating to walking, cycling and public transport may also benefit from our input.

Chapter 4 – Infrastructure – Public Transport

Note the previous comment on STPR. We would suggest that any future reference to “*Improved journey times to Edinburgh...*” should specifically mention rail journeys to clarify that this specific issue relates to train travel not road or bus.

Chapter 4 – Infrastructure – Perth Transport Futures Project

We note the intended start date of 2020-21 for commencing construction of the CTRL. As the delivery of the CTRL directly limits development of residential areas around the Perth Housing Market area, it would be useful if the LDP set out levels or areas of development against phases to provide some clarity.

As per comment on Table 5 Actions, Transport Scotland should be involved in early discussions on schemes which may impact the strategic transport network, such as changes to approach roads and new park and ride site to the north of the city.

Chapter 4 – Infrastructure – Broxden and Inveralmond Roundabouts

The section states “*The Council are currently, in association with Transport Scotland, taking forward design options for improvements to both Broxden and Inveralmond junctions to facilitate the anticipated growth levels set out in TAYplan.*”

The LDP needs to clarify that short to medium term improvements are required to accommodate significant levels of proposed development traffic in the Perth area. Improvements to these junctions have always been assumed in the modelling for the Perth

Futures work and we have been involved in the council's work to move these potential modelled solutions to more detailed design and costing. As stated in previous correspondence and discussions, the longer term options highlighted in the STPR have no funding commitment and delivery will fall outwith the plan period.

It is essential that the emerging LDP, Action Programme and associated Supplementary Guidance set out a developer contribution protocol and mechanisms to ensure delivery of any required improvements at Broxden and Inveralmond. The LDP should also consider how the improvements are to be fully funded if developer contributions are not meeting all costs and if phased delivery is appropriate. Agreements also needs to be reached between Transport Scotland, PKC and the developers as to who will be responsible for the design and delivery of the improvements.

Chapter 4 – Housing (excluding Greater Dundee HMA)

This section refers to a pedestrian/cycleway connection across the A9 in the vicinity of the Newhouse Farm area. Transport Scotland must be consulted about the principle, location, design and construction of any such facility, given its proximity and potential impact on the trunk road.

Table 6 - Transport Scotland would recommend the Accessibility sub-section be extended to include an additional bullet that requires the Transport Assessment(s) to also consider the impact on and likely phased mitigation measures for Broxden and Inveralmond junctions. This will clarify developer requirements, to avoid doubt.

APPENDIX 1 POLICY ANALYSIS

Policy	Transport Scotland Comment
Policy PM2 Design Statements	<p>Transport Scotland supports the amendment to include reference to the requirement for Design Frameworks to be submitted for the Strategic Development Areas.</p> <p>Where there is likely to be a development impact on the strategic transport network, we request to be consulted on the relevant emerging Design Frameworks.</p>

APPENDIX 4 SUPPLEMENTARY GUIDANCE

Transport Scotland would make the following comments:-

Guidance	Transport Scotland Comment
Transport Standards Guide	Transport Scotland notes the National Roads Development guide is to provide non statutory guidance. This document applies to the local road network. Transport Scotland would highlight that for the trunk road network, the Design Manual for Roads and Bridges (DMRB) is applicable.
Development Briefs/ masterplans and Development Frameworks	Transport Scotland supports the principle of the preparation of these informative documents. Where proposed development impacts on the trunk road network, Transport Scotland requests it is included in the review process, to ensure any necessary and appropriate mitigation measures for the trunk road network are identified. The process shall also consider cumulative impact from a number of sites, where relevant.
Developer Contributions December 2011 incorporating Primary Education and A9 Junction guidance	Summary of analysis notes as the financial market changes there will be a need to revise the contributions required from developers which are set out in the Developer Contributions guidance. Transport Scotland notes the Developer Contributions document available to download on the Council website is dated August 2014, rather than December 2011. Transport Scotland would request that if there are changes to proposed developer contributions for the Auchterader A9 Junction Improvements project, it be advised of these, for information.
Developer Contributions and Transport Infrastructure	Summary of analysis notes as the financial market changes there will be a need revise the contributions required from developers which are set out in this guidance. An update to this guidance or links to additional guidance should be made to highlight that there is a need for improvements to both the Broxden and Inveralmond junctions. It is important that any required Broxden and Inveralmond junction improvements are highlighted with LDP2 and relevant supporting documentation in order to resolve this issue.

MONITORING STATEMENT

Perth Transport Futures Project

Text makes reference to the Perth Transport Futures Project stating "...ensure Perth's growth does not compromise the national trunk road network..."

The proposals within the Perth Transport Futures Project do not include improvements to the Broxden or Inveralmond Roundabout junctions. As these junctions are both directly impacted by LDP development, it is appropriate both junctions are highlighted and discussed within the PKC LDP2 documentation.

Transport and Accessibility

Text notes there is no need for further Supplementary Guidance.

The current PKC LDP and its supporting Supplementary Guidance do not make specific reference to required improvements to both Broxden and Inveralmond Roundabout junctions. Both of these junctions are directly affected by development and, therefore, developer contributions should be sought for their enhancement. Developers should be made aware of this requirement.

Supplementary Guidance – Policy Analysis Developer Contributions and Transport Infrastructure

The Issues column of the table states “As the financial market changes there will be a need to revise the contributions required from developers which are set out in this guidance.”

The opportunity should be taken to update this guidance to highlight that, as a result of LDP development, there is a need for improvements to both the Broxden and Inveralmond Roundabout junctions. Developments in the wider Perth Area that are required to contribute to the CTRL, Park & Ride and A9/A85 projects but should also contribute to the cumulative impact on the Broxden and Inveralmond junctions where appropriate.

Yours Sincereley

Jane Tennant
Graduate Planner