REPORT TO:PLANNING AND TRANSPORTATION COMMITTEE - 28 OCTOBER 2002REPORT ON:THE FINALISED PERTH AND KINROSS STRUCTURE PLANREPORT BY:DIRECTOR OF PLANNING AND TRANSPORTATIONREPORT NO:714-2002

1 PURPOSE OF REPORT

1.1 To advise the Committee of the publication of the Finalised Perth and Kinross Structure Plan, and seek approval of the formal objections and comments submitted by the Director of Planning and Transportation on behalf of the City Council to Scottish Ministers.

2 **RECOMMENDATIONS**

- 2.1 It is recommended that the Committee:
 - i Notes that the Finalised Perth and Kinross Structure Plan was submitted to Scottish Ministers on 13 September 2002, and that formal objections were invited by 25 October 2002;
 - ii Notes that despite the substantial objections to the proposed new village at Errol submitted in response to the Draft Plan, and the lack of any housing demand justification for this development, the Proposal is still retained in the Finalised Structure Plan; and
 - iii Approves the formal objections made by the Director of Planning and Transportation in consultation with the Convenor of the Planning and Transportation Committee to Scottish Ministers, specifically in relation to the proposed new village at Errol and the comments submitted in respect of the possible development of Errol Airfield as a commercial airport.

3 FINANCIAL IMPLICATIONS

3.1 There are no financial implications as a result of this Report.

4 LOCAL AGENDA 21 IMPLICATIONS

- 4.1 The proposed new village at Errol has previously been put forward as an 'employment led' and 'sustainable' development. The Finalised Plan focuses on the major economic opportunities of this proposal. However, it is considered that rather than minimising travel movements by providing housing and employment in close proximity, the new village is likely to generate substantial commuter trips to other centres of employment. The planning merits of developing a new settlement alongside a commercial airport must also be questioned.
- 4.2 A new settlement at Errol cannot be justified in terms of housing demand. A new village of any significant scale within Errol is likely to detract from the Finalised Perth and Kinross Structure Plan's Development Strategy for the Perth Core and Lowland Areas, particularly in respect of housing and employment development. The Errol proposal is also inconsistent with the Finalised Dundee and Angus Structure Plan, and will undermine the strategy that seeks, inter alia, to establish a focus for additional land release for housing and employment development to the west of the City, to extend locational choice as part of an integrated approach to the further development of Dundee as a strong regional centre.

5 EQUAL OPPORTUNITIES IMPLICATIONS

5.1 The establishment of an up-to-date strategic framework for land use planning is a basic essential for ensuring the equitable provision of facilities and services for all sectors of the community.

6 BACKGROUND

- 6.1 Members of the Committee will recall that the Perth and Kinross Draft Structure Plan was published for comment on 10 August 2001.
- 6.2 Dundee City Council made representations (Report 471-2001) on the Draft Plan indicating its strong opposition to Sustainable Communities Proposal 1 in respect of the proposed new settlement at Errol, advising that a formal objection would be lodged if this proposal were incorporated in the Finalised Plan, along with representations to the Scottish Ministers.
- 6.3 The Finalised Structure Plan was approved by Perth and Kinross Council on 17 July 2002 and was submitted to Scottish Ministers on 13 September 2002. Objections were required to be submitted to Scottish Ministers by 25 October 2002. As this preceded the consideration of this matter by the Planning and Transportation Committee, the Director of Planning and Transportation on the basis of Report 471-2001 on the Draft Perth and Kinross Structure Plan, and in consultation with the Convenor of the Planning and Transportation Committee, submitted formal objections to the inclusion of the proposed new settlement at Errol. The terms of this objection are outlined below.

7 SUSTAINABLE COMMUNITIES PROPOSAL 1

- 7.1 Some 104 comments were received as part of the consultation exercise for the Draft Plan. Of those, 41 related to the proposed new village at Errol Airfield as contained in Sustainable Communities Proposal 1. Only 3 representations were in support, 2 of which were from developers with interests in the proposal.
- 7.2 In addition to Dundee City Council, those opposing the Errol village proposal include: Scottish Executive Roads Directorate; Joint Dundee/Angus Structure Plan Panel; Communities Scotland; Scottish Enterprise Tayside; Homes for Scotland; Association for the Protection of Rural Scotland; Railtrack; Royal Fine Art Commission for Scotland; individual house builders; and Community Councils.
- 7.3 Notably, Perth and Kinross Council's Director of Housing and Property Services did not consider Errol as a suitable location for affordable housing. The Director of Roads, Transport and Architectural Services agreed with the Scottish Executive Roads Directorate that this is not a "sustainable" location.
- 7.4 The main issues raised by objectors were as follows:
 - Lack of demand for housing;
 - Unsustainable location in terms of traffic generation and accessibility;
 - Impact on Dundee Housing Market Area;
 - Better choices available edge of Perth or Dundee; and
 - No evidence of ability to deliver the academic/business components.
- 7.5 Despite the heavy body of objection the Finalised Plan incorporates a slightly modified Sustainable Communities Proposal 1 as follows:

"The Council will support the establishment of a new village at Errol Airfield on the basis that it offers either an airport and/or a unique economic development opportunity for high technology

and IT-based business development, and that consent be linked to evidence that substantial economic development benefits to Perth and Kinross be delivered."

7.6 Perth and Kinross Council's response to Dundee City Council and other objectors to Sustainable Communities Proposal 1, published in the Publicity and Consultation Statement was as follows:

"It is not accepted that the proposal should be deleted as it provides an economic development opportunity and housing choice."

- 7.7 It is considered that this statement insufficiently justifies Perth and Kinross Council's decision to set aside the nature of objections from the Scottish Executive and other notable consultees and support this significant development proposal.
- 7.8 Sustainable Communities Proposal 1 raises issues of fundamental concern to the Development Strategy of the Finalised Dundee and Angus Structure Plan. In particular, the integrated strategy to improve the attractiveness of Dundee as a place to live, work and visit and therefore tackle the causes of population out migration will be undermined by the possible development of a significant new settlement at Errol.
- 7.9 In addition to not complementing the development strategy of the Finalised Dundee and Angus Structure Plan, it would also appear that the development of a new settlement at Errol may sit uncomfortably with the development strategy of the Finalised Perth and Kinross Structure Plan.
- 7.10 In this regard it is not clear from the Finalised Plan whether Errol forms part of Perth Core or Perth Lowland planning area. The Draft Plan appeared to indicate Errol's inclusion within Perth Core, based on a 20 minute drive time catchment. The spatial strategy map of the Finalised Plan shows Errol as being within the Lowland Area. This coincides with the Publicity and Consultation Statement which confirms that Errol now falls outwith the Core as a result of a redefined 25 minute local bus travel time catchment. However, the Written Statement incorporates the new village proposal under a Perth Core Area heading. In either case, Sustainable Communities Proposal 1 sits uncomfortably with the housing and economic development objectives of both the Perth Core and the Lowland Area Strategies.
- 7.11 In particular, the Perth Core Area Strategy seeks to accommodate growth by meeting housing demands generated in the Core Area, whereas a new village at Errol on any significant scale is likely to draw demand away from the Core Area. The Lowland Area Strategy seeks to allocate further prime business and industrial land in the former Burghs and in other areas of deficiency. There does not appear to be any such deficiency in Errol and this brings into the question the relevancy of the economic component of the proposal. The housing component also appears to go beyond the scale of housing opportunities normally associated with smaller villages.
- 7.12 Ultimately, the inclusion of Sustainable Communities Proposal 1 in the Finalised Perth and Kinross Structure Plan raises substantial conflicts between the Development Strategy of this Plan and the Finalised Dundee and Angus Structure Plan which will clearly require resolution by Scottish Ministers.
- 7.13 It is also surprising that provision for a new village at Errol does not feature within Housing Schedule 1 of the Finalised Perth and Kinross Structure Plan. The modest scale allocations in both the Perth Core and Perth Lowland areas are sufficient to meet the projected demands in the Perth Planning Area. Indeed, Perth and Kinross Council's decision to revise the population growth assumption to only 3% over the Plan period as opposed to 6.4% in the Draft Plan serves to reinforce the point that an additional new village at Errol cannot be justified in terms of housing demand.

- 7.14 Following on from this, it is unclear what Perth and Kinross means by a unique economic development opportunity for high technology and information technology based business development that provides a basis for support of a new village.
- 7.15 If Errol Airfield were to be developed as a commercial airport, this would reduce the capacity for brownfield housing development on the site, placing much greater emphasis on greenfield allocations. This undermines the brownfield advantages previously put forward in support of the new village.
- 7.16 Experience demonstrates the problems encountered when airports are developed in close proximity to houses. Residential settlements and airports are incompatible land uses. Airport developments tend to destroy residential amenity and damage the areas in which they are set. The planning merits of simultaneously promoting a major new settlement and a commercial airport are therefore questioned.
- 7.17 Furthermore, Sustainable Communities Proposal 1 does not specify a requirement for the housing and high technology development or commercial airport components to be brought forward concurrently. In light of the above, there would appear to be potential for the housing component to be developed in advance of any such economic component. However, without an employment led justification the proposal is largely similar to one which was rejected at the 1999 Public Inquiry in the Perth Area Local Plan Alteration.

8 SUSTAINABLE ECONOMY PROPOSAL 3

8.1 Sustainable Economy Proposal 3 has been added in respect of establishing a commercial airport at Errol airfield and states:

"The Council will, with a range of bodies, investigate the potential for the development of Errol Airfield as a commercial airport."

8.2 Whilst Dundee City Council does not object to this investigation, in light of the potential environmental and transport impact of such a proposal on Dundee, together with the commercial impact on Dundee Airport, it is important that the Council is a key partner in any future discussions about such a development.

9 CONCLUSIONS

- 9.1 Dundee City Council objects to the inclusion of Sustainable Communities Proposal 1 in the Perth and Kinross Finalised Structure Plan on the grounds that:
 - i The proposal will not complement the development strategy of the Finalised Dundee and Angus Structure Plan, which seeks to address population decline from Dundee;
 - ii The proposal is inconsistent with the development strategy of the Finalised Perth and Kinross Structure Plan; and
 - iii There is insufficient justification for such a major proposal in housing demand terms.
- 9.2 Finally, Dundee City Council has expressed a desire to be involved in any further investigations regarding Sustainable Economy Proposal 3.

10 CONSULTATIONS

10.1 The Chief Executive, Director of Finance, Director of Support Services, Director of Corporate Planning, Director of Education, Director of Housing, Director of Economic Development and the Legal Manager have been consulted and are in agreement with the contents of this report.

11 BACKGROUND PAPERS

- 11.1 Towards a Sustainable Future, Perth and Kinross Structure Plan, Finalised Written Statement, July 2002.
- 11.2 Report to Perth and Kinross Council 17 July 2002, Finalised Perth and Kinross Structure Plan
- 11.3 Report 471-2001 to Dundee City Council Planning and Transportation Committee 27 August 2001

Mike Galloway Director of Planning and Transportation

Iain Jack Acting Policy and Regeneration Manager

27 September 2002

IJ/SJ/EB SP15

Dundee City Council Tayside House Dundee