



Planning Department
Perth and Kinross Council

By Email Only

14 March 2019

Supplementary Guidance - Placemaking

Dear Sir/Madam

Homes for Scotland welcomes the opportunity to respond to the above consultation. Broadly we consider that the tone and content of the document is useful focusing on the process of good placemaking.

Unfortunately, the document is undermined by the reliance on a further suite of technical notes. The current planning bill is sensibly seeking to remove supplementary guidance due to the complexity it adds to the system. The proposed inclusion of technical notes too would create a labyrinthine policy context. It would require those engaging with the planning system to not just understand the relationship between the three main tiers of the planning system (national, regional and local), but also to then, after having read policies in the local plan, locate the relevant supplementary guidance and then refer to the technical notes too. This is an unreasonable amount of complexity which will be particularly onerous for smaller developers to navigate through.

The Technical Notes should be deleted with relevant text included in the Supplementary Guidance, if it's considered necessary, and subjected to further consultation. However, we would suggest they could simply be deleted as the points they cover are largely covered in the Supplementary Guidance.

Whilst the Supplementary Guidance overall is broadly useful there are some instances where the requirements of the document are unduly prescriptive. These are considered below in the order they appear in the document.

The requirement on page 9 to *"Always provide evidence of how you feel the consultation went by sending your report to the Community Council prior to submitting it to the Council"* is unnecessary. The report will be provided as part of the application and as such subject to a statutory consultation period. The Community Council will therefore have the opportunity to comment on it and the other application documents at that stage. This requirement should be removed as it is clearly unnecessary.

On page 14 it is stated that *"Furthermore, buildings should have a southerly aspect for private spaces and living room, taking advantage of the maximum hours of daylight."* This is an unreasonable requirement. Particularly for a larger housing development where constraints must be dealt with as well as many competing design requirements it will be impossible to provide a layout where all homes face south, are one room deep with south facing gardens (if that is what's meant by 'private spaces'). It should be amended to instead state that *"subject to other design considerations properties should be positioned to ensure access to adequate levels of daylight and sunlight"*.

The requirement is also covered to some extent by the requirement for SAP calculations as part of the Building Standards process.

On Page 21 the statement that *“Where the buildings are listed, these will have to be preserved and enhanced through conversion and should be incorporated into the proposal”*, is not consistent with HES guidance which allows in certain circumstances for harm to the significance of listed buildings to be weighed against public benefits associated with the proposal. This wording should be amended so its consistent.

Homes for Scotland welcomes the opportunity to comment on the consultation. We consider that a few specific changes are made to the document to ensure it is consistent with other policies and does not set out insurmountable policy hurdles. More fundamentally we object to the use a suite of supporting technical documents. These add unnecessary complexity and should be deleted.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Joe Larner', written in a cursive style.

Joe Larner

Senior Planning Advisor